



January 19, 2011

Mr. Claude Harris, Acting Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington, D.C. 20590

SENT VIA: U.S. Mail (Certified) and E-Mail to RMD.ODI@dot.gov

Subject: Vehicle Defect Information Report Pursuant to 49 CFR Part 573

Dear Mr. Harris:

On January 18, 2011, THINK North America, Inc. ("THINK") determined that a defect relating to motor vehicle safety exists in the motor vehicles listed herein, and is furnishing notification to the National Highway Traffic Safety Administration pursuant to 49 CFR Part 573.

Summary:

- Type and Number of Vehicles Involved – 2011 THINK City model vehicles; there are sixteen (16) vehicles in the field, all of which are in the United States.
- Action – THINK is conducting a safety recall involving certain 2011 THINK City model vehicles. This recall action will involve the inspection, reinstallation or, if necessary, replacement of the vehicles' seat belts (this vehicle model has no rear seat).
- Description of Defect – THINK has recently begun production of the 2011 THINK City model vehicles; final assembly was performed at THINK's Elkhart, IN facility. THINK's vehicle assembly operations may have inadvertently installed the driver-side seat belt subassemblies into the passenger-side seating positions (and vice versa) during the vehicles' final assembly processing. The passenger-side seat belt subassembly includes a special tensioner for use with child restraint systems; this special tensioner is not included in the driver-side seat belt subassembly. Installation of the driver-side seat belt subassembly in the vehicle's passenger-side seating position will not provide the intended retention or positioning of a child restraint system.
- Notification and Recall Program – THINK will send notification letters to the vehicle owners and to the vehicle dealer (see exhibits below) pursuant to 49 CFR Part 577. To the extent possible, THINK will also work with the dealer to make telephone contact with vehicle owners. In addition to instructing owners to take the vehicles to the dealer for

Letter to Mr. Claude Harris
January 18, 2011
Page 2

service, owners will also be cautioned to refrain from using child restraint systems in the vehicle until the service is completed.

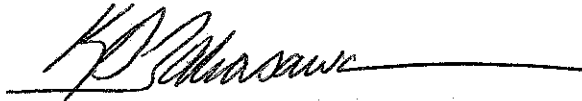
The following exhibits are attached to this letter for review:

<u>Exhibit A</u>	Vehicle Defect Information Report
<u>Exhibit B</u>	Proposed Owner Notification Letter (with envelope)
<u>Exhibit C</u>	Proposed Dealer Notification and Service Bulletin

Thank you for your kind attention to this matter.

Respectfully,

THINK North America, Inc.



Keith Takasawa
Director, Product Development
THINK North America, Inc.

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49 CFR Part 573 – VEHICLE DEFECT INFORMATION REPORT

573.6(c)(1) – MANUFACTURER:

THINK North America, Inc.
22226 Garrison Street
Dearborn, MI 48124
Attention: Mr. Keith Takasawa, Director, Product Development

573.6(c)(2) – POTENTIALLY AFFECTED VEHICLES

Vehicle Model: “THINK City” / Vehicle Model Year: 2011
The affected vehicles were shipped from THINK’s Elkhart, IN final assembly facility prior to December 23, 2010. All vehicles shipped prior to this date may have improperly installed seat belt subassemblies.

573.6(c)(3) – ESTIMATED POPULATION OF VEHICLES POTENTIALLY AFFECTED

Sixteen (16) vehicles:

53TBH2MC0BE900045	53TBH2MC6BE900034
53TBH2MC1BE900054	53TBH2MC6BE900048
53TBH2MC2BE900046	53TBH2MC6BE900051
53TBH2MC2BE900063	53TBH2MC8BE900035
53TBH2MC2BE900077	53TBH2MC8BE900052
53TBH2MC4BE900047	53TBH2MC9BE900044
53TBH2MC4BE900064	53TBH2MC9BE900075
53TBH2MC5BE900039	53TBH2MCXBE900053

(note: vehicles are not built or shipped in VIN order)

573.6(c)(4) – ESTIMATED PERCENTAGE OF VEHICLES WITH DEFECT

Unknown at this time.

573.6(c)(5) – DESCRIPTION OF THE DEFECT

Installation of seat belt subassemblies into incorrect vehicle seating positions. Specifically, the driver-side seat belt subassemblies may have been installed into the passenger-side seating positions (and vice versa) during the final assembly processing of the vehicles. The passenger-side seat belt subassembly includes a tensioner required for proper retention of a child restraint system in the vehicle’s passenger-side seating position. The driver-side seat belt assembly does not have this feature and may have been improperly installed in the vehicle’s passenger-side seating position. As a result of this possible reversed installation, a child restraint system used in the passenger-side seating position may not be positioned or retained in the intended manner.

573.6(c)(6) – CHRONOLOGY OF EVENTS FOR DETERMINING THE SAFETY DEFECT

In connection with its evaluation of new production build quality, THINK discovered incorrect installation of seat belt subassemblies during the week of December 20, 2010. THINK then confirmed that the root cause was the production operator’s error.

THINK instituted an inspection prior to any further shipment of vehicles on approximately December 23, 2010 (the “clean-point”). THINK repaired any incorrectly built unshipped vehicles; as such, vehicles built or shipped after

EXHIBIT A – Vehicle Defect Information Report

the clean-point are not required to be inspected and repaired.

Seventeen vehicles were shipped before the clean-point. In early January 2011, THINK was able to locate one of these vehicles in the field and confirmed that the seat belt subassemblies were incorrectly installed (THINK corrected this particular vehicle at the time of this inspection).

THINK conducted an engineering analysis to assess the possible ramifications of the incorrectly installed seat belt subassemblies on the remaining sixteen pre-clean-point vehicles. On January 14, 2011, a preliminary engineering report was developed and reviewed. Based on its review of the final version of this report, THINK's Product Safety Committee met on January 18, 2011, and determined that a safety related defect existed in the sixteen pre-clean-point vehicles and decided to conduct a safety recall for the vehicles.

573.6(c)(7) – *Not Applicable*

573.6(c)(8) – MANUFACTURER'S PROGRAM TO REMEDY DEFECT IN RECALLED VEHICLES

The dealer will inspect the installation of the seat belt subassemblies in both the passenger and the driver seating positions; they will confirm whether or not the seat belt subassemblies are installed in the correct position. If the inspection reveals installation in the incorrect position, the dealer will remove and reinstall the seat belt subassemblies, placing them in their correct positions. In some cases, if needed, the dealer may also replace any such parts with new seat belt subassemblies.

THINK anticipates sending the dealer notification and service bulletin on approximately January 24, 2011, and mailing the owner notification letters on January 24, 2011.

Because all involved vehicles are covered under the new vehicle warranty, and pursuant to 49 CFR §577.11(e), THINK does not plan to provide notice about reimbursement for pre-notification repairs.

573.6(c)(9) – *Not Applicable*

573.6(c)(10) – PROPOSED FORM OF NOTIFICATION LETTER AND BULLETIN

THINK has submitted proposed forms of the owner notification letter and the dealer notification and service bulletin as additional exhibits along with this report.

573.6(c)(11) – MANUFACTURER'S CAMPAIGN NUMBER

THINK anticipates using "Field Action No.: 11-101" for this purpose.