



January 21, 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 21, 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 – THINK is conducting a safety recall involving certain 2011 THINK City model vehicles; the recall involves twenty three (23) vehicles in the field, all of which are in the United States.
- Description of Defect – This recall action pertains to the vehicles' fluid heater assemblies and its performance as part of the vehicles' defroster/defogger system. Poor performance in the vehicles' fluid heater assemblies could cause the heater-defroster system of the vehicle to fail to perform properly resulting in loss of its ability to clear the windshield in cold or humid conditions. This could impair the driver's ability to view the road ahead, potentially increasing the risk of a vehicle crash.
- Action – The vehicles' fluid heater assemblies will be inspected and evaluated by the dealer using an enhanced performance testing procedure. If this evaluation indicates a potential performance problem with the vehicle's fluid heater assembly, the dealer will remove that fluid heater assembly, install a replacement fluid heater assembly and retest.
- 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 the

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recall, owners will be advised to be alert for indications that their vehicles might possibly be exhibiting reduced defroster or heater performance.

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 potentially affected vehicles were shipped from THINK’s Elkhart, IN final assembly facility prior to December 22, 2010.

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

Twenty three (23) vehicles:

53TBH2MC6BE900034	53TBH2MC7BE900009
53TBH2MC8BE900035	53TBH2MC9BE900013
53TBH2MC5BE900039	53TBH2MC9BE900015
53TBH2MC6BE900048	53TBH2MC8BE900018
53TBH2MC6BE900051	53TBH2MCXBE900019
53TBH2MC8BE900052	53TBH2MC6BE900020
53TBH2MC4BE900064	53TBH2MC8BE900021
53TBH2MC9BE900075	53TBH2MC1BE900023
53TBH2MC0BE900076	53TBH2MC5BE900025
53TBH2MC2BE900077	53TBH2MC9BE900027
53TBH2MCXBE900005	53TBH2MC0BE900076
53TBH2MC5BE900008	

(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

The fluid heater assemblies in the vehicles perform as part of the vehicles’ defroster/defogger systems. Some of the vehicles’ fluid heater assemblies may exhibit performance variation or other problems resulting in inadequate and/or unstable heat output. This varying or inadequate performance in the fluid heaters could cause poor performance of the vehicles’ defroster systems. The resulting loss of the ability to clear the windshield, even though the onset is gradual and discernable by the driver, could potentially increase the risk of a vehicle crash.

The poor heating performance of the fluid heater assemblies during usage in the field is due to variations in the assemblies’ build and processing at the supplier’s facility, which is under investigation. Until the build and process variations can be eliminated, the defect is being addressed via more extensive bench testing at the supplier and enhanced performance testing at the assembly plant and, if necessary, replacement.

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

In September 2010, THINK established its production operations with HVAC system inspection points that assessed the basic functionality of the fluid heater assemblies prior to vehicle shipment.

EXHIBIT A – Vehicle Defect Information Report

In December 2010, THINK was informed of a field vehicle exhibiting poor fluid heater performance; THINK evaluated the vehicle and eliminated other root-causes from prior fluid heater concerns. THINK also received unconfirmed anecdotal reports that two other field vehicles may have also exhibited similar concerns. In response, THINK implemented in-depth test procedures at two points on the production-line (“enhanced performance tests”) beginning on December 22, 2010 (the “clean-point”). All unshipped vehicles were inspected using the enhanced performance test. The results of the enhanced performance testing, reported during the week of January 17, 2011, reflected performance problems in approximately 9% of the fluid heater assemblies.

THINK reviewed production records to identify the vehicles that had been shipped prior to the clean-point. THINK conducted an engineering analysis to assess the possible safety ramifications of the potential performance problems in fluid heater assemblies on these pre-clean-point vehicles. On January 13, 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 21, 2011, and determined that owners of vehicles shipped prior to the clean-point should be notified of the condition as a safety-related defect and requested to have the vehicles inspected by the dealer.

573.6(c)(7) – *Not Applicable*

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

The dealer will evaluate the performance of the recalled vehicles’ fluid heater assemblies using the enhanced performance tests which will detect inadequate or varying heat output as well as rule out other possible causes for these performance problems. If this evaluation indicates a performance problem, the dealer will remove that fluid heater assembly and install a replacement fluid heater assembly that has gone through more extensive bench testing at the supplier. The replacement fluid heater assemblies will be re-tested, confirming the unit’s passing performance in terms of adequacy and stability of heat output.

THINK anticipates sending the dealer notification and service bulletin on approximately January 28, 2011, and mailing the owner notification letters on January 28, 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.: 11-102” for this purpose.