

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On August 26, 2011 Vantage Mobility International decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: August 31, 2011.

Furnish the manufacturer's identification code for this recall (if applicable): _____

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Vantage Mobility International, LLC, an Arizona limited liability company

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

David Eaton – VP Technical Services

Telephone Number: 602-304-3265 **Fax No.:** 602-304-3290

Name and Title of Person who prepared this report. David Eaton

Signed:



¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Jennifer Timian at (202) 366-0209, by FAX at (202) 366-7882, or by E-Mail to RMD.ODI@dot.gov.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): VMI Odyssey **Model Years Involved:** 2011 **Model(s):** Northstar and Summit

Production Dates: Beginning: June 26, 2011 **Ending:** August 22, 2011

VIN Range: Beginning: BB010723 **Ending:** BB507619

Vehicle Type: Light **Bodystyle:** Minivan with wheelchair accessible conversion

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

The subject vehicles contains 2 fuel lines with non-conductive connectors

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles manufactured during that time period.

371 total vehicles produced 6/27/2011 to 8/22/2011
80 recall vehicles
22%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
VMI Odyssey Northstar	2011	64
VMI Odyssey Summit	2011	16
Total Number Potentially Affected by the Recall:		80

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 90%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

On or about August 24, 2011 VMI was informed by an outside supplier of fuel line assemblies that the connector fittings on a batch of the fuel lines supplied to VMI were made with resin that is “non-conductive”. The supplier informed VMI that the lines with non-conductive fittings should be pulled from the shelves and not used. VMI quarantined the defective supply that had not been installed and returned them to the supplier. All parts supplied from 6/27/2011 to 8/24/2011 were potentially non-conforming to conductive material standards. VMI determined that it was possible that the lines used in production from as early as 6/27/2011 to 8/24/2011 could have contained defective fittings. All 2011 VMI Odyssey vehicles produced and not shipped during that time have been retrofitted by VMI at the VMI factory. All 2011 VMI Odyssey vehicles produced and shipped during that time are subject to the recall.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

There are two lines in each vehicle that have the potential to be faulty. The first line runs from the engine compartment to the underside of the vehicle where it connects to an aluminum line running fore and aft under the vehicle. The second runs from the sending unit on top of the fuel tank to the other end of the same aluminum fuel line running fore and aft under the vehicle. Note: VMI relocates the OEM fuel tank to the rear of the vehicle.

Describe the cause(s) of the defect or noncompliance condition.

VMI supplier used a non-conductive resin in the manufacture of the fuel line fittings and the connector resin is supposed to be “conductive”.

Describe the consequence(s) of the defect or noncompliance condition.

VMI believes the purpose of the conductive connector resin is to dissipate static electricity that naturally builds up from the flow of fuel. Conversely, non-conductive lines may not dissipate the static electricity which conceivably could create a spark.

Identify any warning which can (a) precede or (b) occur.

None that VMI is aware of.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Form Fab
3072 Research Drive
Rochester Hills, MI 48309

Form Fab assembles our fuel line assemblies and purchases the connectors from another supplier. The actual manufacturer of the connectors is Rayconnect.

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:
VMI's contact at Form Fab is Alan Gilroy

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

- Informed by Form Fab of the non-conforming parts 8/24/2011
- Halt installation of non-conforming parts 8/24/2011
- Quarantine non-conforming parts and ship back to supplier 8/25/2011
- Receive supply of conforming parts 8/25/2011
- Resume production with conforming parts 8/25/2011
- Notify NHTSA 8/30/2011
- Initiate Recall 8/31/2011

There have been zero reports, accidents, injuries, fatalities and warranty claims.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

1. VMI will notify purchasing dealer of the recall instructing how to proceed with retrofitting their inventory and sold units. Draft dealer letter will be submitted to NHTSA for review week of 9/9/2011.
2. VMI will notify end-user customers of the recall instructing them how to set up an appointment with their VMI dealer. Draft end user letter will be submitted to NHTSA for review week of 9/9/2011. Note, of the 80 subject vehicles, VMI currently only has end user data on 16 units. This is because the remaining units are either still in dealer's inventory or they have been sold and we do not yet have the end user information.
3. VMI will ship new fuel lines and retrofit instructions to each selling VMI dealer (see attached retrofit instructions - OP-W-107).
4. Dealers will submit warranty claims for each retrofit completed and VMI will reimburse the dealers for their labor.
5. VMI will monitor the status of each recall until all units have been successfully retrofitted.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

See field retrofit document OP-W-107.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

See field retrofit document OP-W-107. Fuel lines of all 80 vehicles will be replaced without inspecting.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

VMI internal retrofit process is the same as the field retrofit process.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

- VMI will submit drafts of the dealer letter, end user letter and envelopes to NHTSA for approval the week of September 9.
- VMI anticipates mailing dealer letters and retrofit kits to dealer the week of September 16.
- VMI anticipates mailing end user letters the week of September 23.

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.