

August 16, 2011

Recall Management Division
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC 20590

ATTN: Kelly Schuler, Safety Defect Analyst

RE: Safety Defect and Noncompliance Report for Vehicles, IAW 49 CFR Part 573

On June 28th, 2011 Columbia ParCar Corp. notified the NHTSA that a potential safety defect which relates to motor vehicles governed under authority of NHTSA may exist in the motor vehicles listed in the attached report. Columbia ParCar Corp has identified this recall as SR11-001A.

The analysis process has been completed and a remedy developed to correct the defect in the field.

The attached report is an update from the preliminary report previously filed. Further updates will be provided as may become necessary.

Sincerely,

Mr. John W. Martens
Technical Support Manager
Columbia ParCar Corporation

Encl:

- (1) Updated Report
- (2) Appendix A Inspection Flowchart
- (3) Appendix B Inspection/Repair Process
- (4) Appendix C Inspection/Repair Completion Checklist
- (5) Proposed Dealer Notification Letter
- (6) Proposed Customer Notification Letter

SAFETY DEFECT AND NONCOMPLIANCE REPORT

I. VEHICLE MODELS INVOLVED IN RECALL:

- S1. Make: Columbia Model Year: 2009 Model: Summit (SMT2, SMT4, SUV)
Vehicle Type: 48 Volt Electric Body Style: Passenger/Utility
Production Dates: Beginning: 7/1/2008 Ending: 6/30/2009
VIN Range: Beginning: 5FCLS****81000423 Ending: 5FCLS****81000423
- S2. Make: Columbia Model Year: 2010 Model: Summit (SMT2, SMT4, SUV)
Vehicle Type: 48 Volt Electric Body Style: Passenger/Utility
Production Dates: Beginning: 7/1/2009 Ending: 6/30/2010
VIN Range: Beginning: 5FCLS****A1000186 Ending: 5FCLS****A1001950
- S3. Make: Columbia Model Year: 2011 Model: Summit (SMT2, SMT4, SUV)
Vehicle Type: 48 Volt Electric Body Style: Passenger/Utility
Production Dates: Beginning: 7/1/2010 Ending: 6/30/2011
VIN Range: Beginning: 5FCLS****B1000101 Ending: 5FCLS****B1001962
- E1. Make: Columbia Model Year: 2009 Model: Eagle (P4E)
Vehicle Type: 48 Volt Electric Body Style: Passenger
Production Dates: Beginning: 7/1/2008 Ending: 6/30/2009
VIN Range: Beginning: 5FCLE****91000102 Ending: 5FCLE****91000506
- E2. Make: Columbia Model Year: 2010 Model: Eagle (P4E)
Vehicle Type: 48 Volt Electric Body Style: Passenger
Production Dates: Beginning: 7/1/2009 Ending: 6/30/2010
VIN Range: Beginning: 5FCLE****A1000101 Ending: 5FCLE****A1001893
- E3. Make: Columbia Model Year: 2011 Model: Eagle (P4E)
Vehicle Type: 48 Volt Electric Body Style: Passenger
Production Dates: Beginning: 7/1/2010 Ending: 6/30/2011
VIN Range: Beginning: 5FCLE****B1000141 Ending: 5FCLE****B1000416

(**** Indicates various non-sorted characters)

II. ESTIMATED RECALL POPULATION BY MODEL YEAR:

1.	Summit:	2009:	<u>0001</u>	2010:	0480	2011:	0204	Total Model:	<u>0685</u>
2.	Eagle:	2009:	<u>0124</u>	2010:	<u>0491</u>	2011:	<u>0058</u>	Total Model:	<u>0673</u>
Potentially Affected:		2009:	<u>0125</u>	2010:	0971	2011:	0262	Total All:	<u>1358</u>
Estimated Defect:		2009:	<u>TBD</u>	2010:	<u>TBD</u>	2011:	<u>TBD</u>	Total All:	<u>TBD</u>

Quantification of models determined using the following filtering method:

- All vehicles manufactured which included the "type" component.
- Only vehicles manufactured which may have included the specific component and process.
- Only vehicles manufactured after the phase in date of the specific component and process.
- Only vehicles manufactured prior to the process correction for installation of the specific component.

III. NATURE OF DEFECT

- A) Possible loosening of lower steering yoke, at point of attachment to steering rack pinion, causing spine teeth to strip, which results in slippage of yoke at pinion gear.
- B) Determined cause of defect: Yoke positioning and retaining bolt tightening processes may not have been consistently followed during production, leading to potential inadequate spline coverage and tension at lower steering yoke.

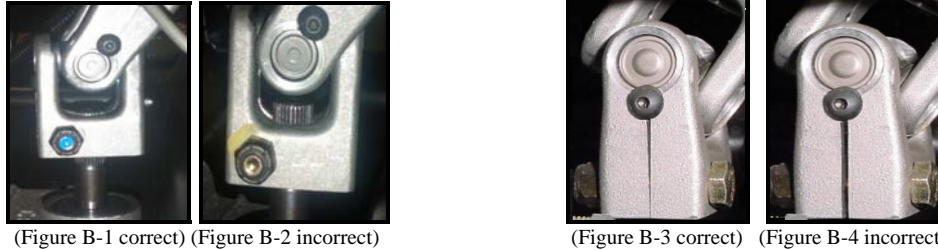


Figure B-1 indicates correct position between steering yoke bottom and steering rack.

Figure B-2 indicates steering yoke mounted too low on steering rack pinion shaft.

Figure B-3 indicates steering yoke bolt properly torqued and compressed.

Figure B-4 indicates steering yoke bolt is not properly torqued or compressed.

C) Potential consequence of defect: Loose steering or loss of steering. This is most likely to occur with vehicle in the stopped or slow moving condition.

D) Possible advanced warning: Steering may feel loose, or exhibit excessive play prior to full loss of steering ability.

IV. CHRONOLOGY OF EVENTS IN DETERMINING PRESENCE OF POSSIBLE DEFECT

20110606: Received fax from dealer with email from GSA customer indicating concern for steering safety.

20110608: Received email with copies of QDR's from GSA customer indicating limited amount of steering failures.

20110616: Confirmed supplier component designed as specified.

20110616: Scheduled customer visit to two separate locations to investigate claims.

20110620: On site inspection at GSA customer location.

20110621: Investigated possible causes for steering failure. Still investigating potential process inconsistencies which may be involved in installation of component.

20110624: Collected data reports from VIN entry system. Identified the following incidents:

Reported Fatalities: 0

Reported Injuries: 0

Reported Accidents: 0

Reported Warranties: 35 (Updated from 29 on 8/1/2011)

20110627: Determined possible defect may exist to warrant recall inspection/repair and notification to NHTSA.

20110701: Correction to production installation and adjustment procedures implemented.

20110725: Following engineering research and investigation, determined final remedy process to complete all required inspection and repairs.

20110725: Upon determination of final remedy process, upgraded date coverage of vehicles to include 1 JUL 08 through 30 JUN 11.

V: PROPOSED REMEDY (Also see attached flowchart/instructions/checklist (App's A/B/C))

1. Inspection of position where steering yoke is fastened to steering rack pinion gear. Clearance between lowest portion of yoke and top of steering rack must be between 15/16" and 1-1/16" inch. If not, lower yoke must be replaced.
2. Measurement of torque on lower steering yoke retaining bolt. This bolt must be a verified grade 8 bolt and properly torqued to 25 ft lbs. If not, lower yoke must be replaced.
3. If position of lower yoke is correct as shown in item 1, and the bolt is properly torqued to 25 ft lbs, no further action is required.

VI: PROPOSED RECALL SCHEDULE

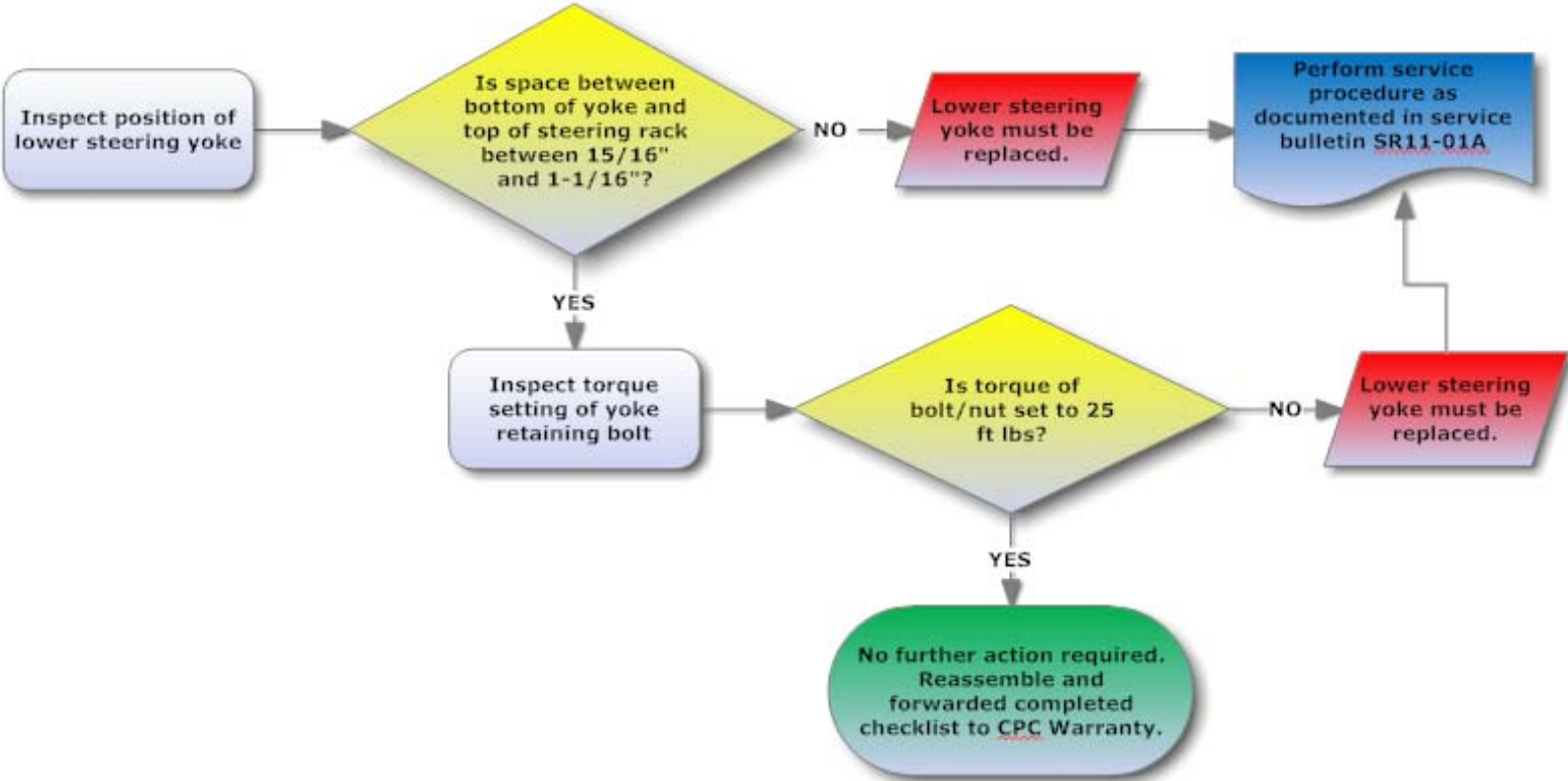
This item is yet to be finalized, pending approval or remedy by NHTSA.

Notification to NHTSA	Completed	20110627
Determination of root cause	Completed	20110725
Documentation of remedy	Completed	20110725
Develop implementation plan	Completed	20110811
Pending approval from NHTSA		TBD
Notification to dealer network		TBD
Notification to registered owner		TBD

VII: COMMUNICATIONS

NHTSA Notification Provided
Proposed Dealer Notification Provided
Proposed Customer Notification Provided

**Columbia ParCar Corp.
Safety Recall SR 11-01A
Decision Flowchart
(Appendix A)**



Date: 8/___/2011

SAFETY RECALL SR 11-001A

Steering Shaft Splined Yoke Inspection and Replacement

This Bulletin is Rated:

<input checked="" type="radio"/>	MANDATORY (Action Required)	<input type="radio"/>	ALERT (Potential Problem)
<input type="radio"/>	PRODUCT IMPROVEMENT	<input type="radio"/>	INFORMATIONAL

Vehicles may have experienced a loosening of the lower splined yoke, at the point of attachment to the steering rack pinion, causing spine teeth to strip. This results in slippage of the yoke at the pinion gear which could affect steering.

This bulletin describes the method for inspection to determine if replacement is required and, if needed, the procedure for replacement. To order a replacement lower yoke Kit, contact CPC Parts Department and order Kit 56950-10.

Affected Models:

Summit (SMT2, SMT4, SUV)
Eagle (P4E)

Parts:

ITEM	CPC P/N	DESCRIPTION	QTY
1	57109-08	Yoke Assembly	1
2	57111-11	Bolt, 5/16-18x1 1/2, HHCS G8 YWZC	1
3	57112-11	Nut, 5/16-18 Nylock G8 YWZC	1
4	760010	Roll Pin 1/4x1 3/4	2
5	6702-B	Washer, 5/16	2

Tools needed:

1/4" Straight Punch Socket/ Wrench Set Hammer Ruler Torque Wrench (Capable of 25 ft lbs)
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Legend:

Danger indicates a hazardous situation which, if not avoided, will result in death or serious injury.

Warning indicates a hazardous situation which, if not avoided, could result in death or serious injury.

Caution indicates a hazardous situation which, if not avoided, could result in minor or moderate injury.

NOTICE: Please read the following instructions carefully and completely before beginning. It is important to have an understanding of the overall instructions as each step is completed.

Date: 8/___/2011

SAFETY RECALL SR 11-001A Steering Shaft Splined Yoke Inspection and Replacement

HOOD/BUMPER REMOVAL

1. If equipped, remove the front bumper. It is held in place with two side 5/16" bolts/nuts (Figure 1 Arrow) and two front 5/16" bolts/nuts (Figure 2A).
2. Detach the lower bumper cover by removing the 5/16" bolts/nuts located at the bottom. (Figure 2B).
2. See Figure 3. Remove the two upper 3/4" nuts located on each side at the top of the lower bumper cover.

Disconnect headlights if they are mounted in the hood section.

Remove the hood and lower bumper cover assembly as one piece. The top section of this assembly is a "press fit" into the body. Pull on the edges to remove.



Figure 1



Figure 2 (A,B)



Figure 3 – Side View

Date: 8/___/2011

SAFETY RECALL SR 11-001A
Steering Shaft Splined Yoke Inspection and Replacement

INSPECTION

1. See Figure 4. Measure the distance between the bottom of the lower splined yoke (Figure 4A) and the top of the steering rack (Figure 4C). This measurement is to be between 15/16" and 1-1/16".

If this space is between 15/16" and 1-1/16" inspect the torque of the yoke retaining bolt (Figure 4B).

If the torque has been set to 25 ft lbs no further action is required. Reassemble the vehicle and forward a completed Checklist (Appendix C) to CPC Warranty.

2. If the distance between the bottom of the lower splined yoke and the top of the steering rack is not between 15/16" and 1-1/16" or if the yoke retaining bolt (Figure 4B) torque was found below 25 ft lbs the lower steering yoke must be replaced.

REPLACEMENT

1. Replacement of the lower splined yoke will require removal of the lower section of the steering shaft assembly. Begin by removing the roll pin from the center yoke using a 1/4" straight punch. See Arrow, Figure 5. Discard this roll pin.
2. Next remove and discard the 5/16" nut (Figure 4B) and bolt which attaches the lower splined yoke to the steering rack.

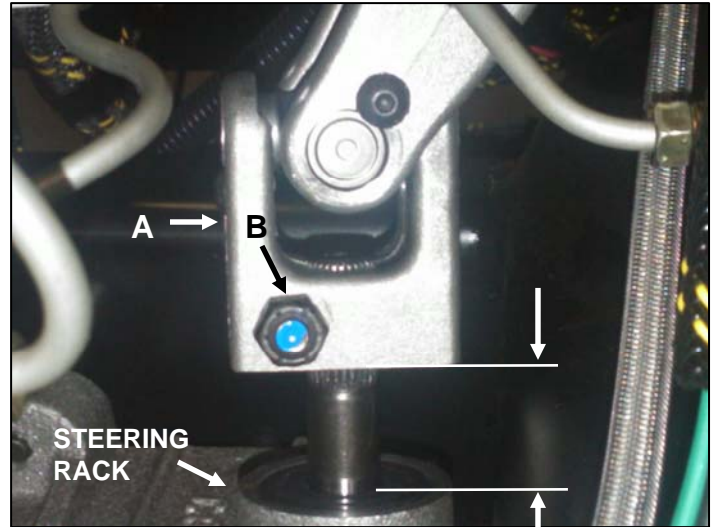


Figure 4 (A,B,C)



Figure 5

Date: 8/___/2011

SAFETY RECALL SR 11-001A
Steering Shaft Splined Yoke Inspection and Replacement

3. To remove the lower section separate the middle yoke from the upper steering shaft and rotate it outward as shown in Figure 6. This will now facilitate removal of the lower section of the steering shaft.
3. From the removed lower section, using a 1/4" straight punch remove the lower splined yoke roll pin and discard the yoke and pin.
4. Replace with a new splined yoke (Item # 1) and new roll pin (Item # 4). and loosely mount this section to the steering rack pinion.
5. Place the middle yoke on the steering tube and secure with a new roll pin (Item # 4).
6. Secure the lower splined yoke to the steering rack using a new bolt (Item # 2) and nut (Item # 3).
7. Make sure the space between the bottom of the splined yoke and the top of the steering rack is between 15/16" and 1-1/16". *NOTE:* If the 15/16" measurement can not be reached, washers (Item # 5) need to be placed under the steering column bracket at the front two positions. See Figure 7.
8. With the lower splined yoke properly placed, torque the yoke retaining bolt (Figure 4B) to 25 ft lbs.

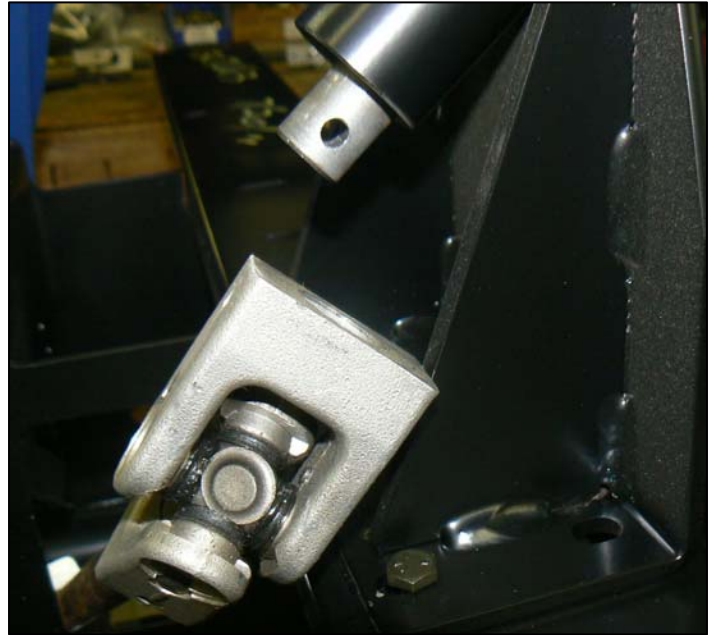


Figure 6

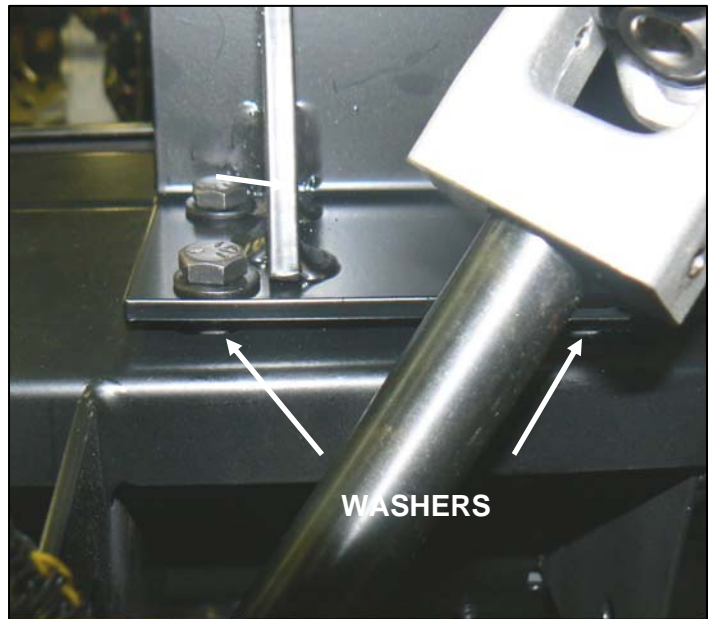


Figure 7

WARRANTY INFORMATION

Forward a completed Checklist to CPC Warranty.

If you have any questions or experience problems with this correction, please contact the Technical Service Department at Columbia ParCar Corp.

SAFETY RECALL SR 11-001A
Inspection and Remediation Verification

All areas must be filled in clearly and completely.

Customer: _____ Model: _____ VIN: _____

Date of Work: _____ Performed by: _____

1. Inspection of position:

Is lower steering yoke position between 15/16" and 1-1/16" from steering rack?

Yes, measurement is _____. If no, replace lower yoke ass'y.

2. Inspection of torque:

Is lower steering yoke retaining bolt torque at least 25 ft lbs?

Yes, torque is _____ ft lbs. If no, replace lower yoke ass'y.

3. If replacement was not required, skip this item. If replacement was required, document following conditions by initials on each line:

_____ Lower steering yoke is now positioned between 15/16" and 1-1/16" from steering rack

_____ Retaining bolt is now set to a torque of 25 ft lbs.

_____ New hardware (yoke, bolt, nut and roll pins) have been utilized.

I certify by my signature that the service required as documented in Columbia ParCar Corp Service Recall Bulletin SR 11-001A has been performed correctly.

Printed Name

Signature

Business Name

Date

Address

City, State, Zip

Date Received by Columbia ParCar Corp (office use)

URGENT SAFETY RECALL Dealer Notification

August ____, 2011

LSV/NEV Dealer
Any Address
Any City, State ZIP

RE: Columbia Electric Vehicle (LSV/NEV)

Defect Involved

Columbia ParCar Corp has decided that a defect which relates to motor vehicle safety may exist in certain 2008-2011 Electric Vehicles. These vehicles may have possible loosening of the lower steering yoke, at point of attachment to steering rack pinion, causing spine teeth to strip, which results in slippage of yoke at pinion gear. The potential consequence of this possible defect if left un-serviced may be loose steering, or loss of steering. This is most likely to occur when the vehicle is in the stopped or slow moving condition, when forces are highest on the steering system.

Vehicles Involved

Involved are certain SMT, SUV, and P4E vehicles built between 7/1/2008 and 6/30/2011.

Vehicles involved have been identified by Vehicle Identification Number computer listings, which contain the complete VIN, owner name and address data, and are furnished to each dealer to enable the dealer to follow up with owners involved in this campaign.

The attached listings reflect the data in Columbia ParCar Corp's computer registration data system, which was input at the time of the vehicle sale from your dealership to the owner. Any VIN's which do not indicate a registered owner, are either still in dealer inventory, or have not been registered. If the units have been sold and unregistered, you must review your sales records, contact those owners and register the vehicles with the correct information via Columbia's online vehicle registration system. If the vehicles are still in your inventory, federal law requires you to complete the recall service on these vehicles before retail delivery.

What should you do?

Columbia ParCar Corp needs your assistance to complete this safety recall as quickly and thoroughly as possible. The vehicle owner is responsible for contacting you and making arrangements to have the work completed. Your responsibility is to ensure that you maintain an adequate supply of Steering Yoke Kits (CPC # 53950-10) and have time allotted to perform the necessary service.

What should you do? (Continued)

The National Traffic and Motor Vehicle Safety Act provides that each vehicle which is subject to a recall campaign of this type must be adequately repaired within a reasonable time after the owner has tendered it for repair. Failure to repair within sixty (60) days after tender of a vehicle is prima facie evidence of failure to repair within a reasonable time.

If this condition is not adequately repaired within a reasonable time, the owner may be entitled to an identical or reasonable equivalent vehicle at no charge, or to a refund of the purchase price less a reasonable allowance for depreciation.

To avoid having to provide these burdensome solutions, every effort must be made to promptly schedule an appointment with each owner and to repair their vehicle as soon as possible. As you will see in reading the attached copy of the letter which is being sent to owners, the owners are being instructed to contact the Columbia ParCar customer service if their dealer does not remedy the condition within three (3) days of the mutually agreed upon date. If the condition is not remedied within a reasonable time, they are instructed on how to contact the National Highway Traffic Safety Administration.

At the time of scheduling the appointment with the owner, briefly describe to the customer the remedial work which will be done to the vehicle. Advise the owner that the service will be performed without charge.

How is the repair completed?

Attached to this letter is the complete Service Recall Bulletin (SR-11-001A) with detailed instructions and photos outlining the full inspection and the replacement process. If you have any questions relating to the repair procedure, please contact Columbia Technical Support at techsupport@parcars.com or call (800) 222-4653.

Once service is completed, the attached checklist **must** be completed and submitted to Columbia for each vehicle serviced before any invoice can be credited.

What about parts?

Parts will be shipped to each dealer, based on the estimated number of parts which will need to be replaced, as a percentage of the vehicle population sold to or through your dealership. If additional part kits are required, order such kits in accordance with standard procedures. All parts will be shipped at standard billing, but at extended payment terms to allow for the service completion and submission of documents. Any unused kits may be returned to Columbia for full credit to your account.

Should you have any questions, please contact us immediately. Thank you for your attention to this important safety matter.

Columbia ParCar Corp.

Attachments:

- (1) App. A/B/C
- (2) Applicable VIN List

URGENT SAFETY RECALL NOTICE

August ____, 2011

Mr. John Doe
Any Address
Any City, State ZIP

Columbia Electric Vehicle (LSV/NEV)
Vehicle Identification Number (VIN):

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Columbia ParCar Corp has decided that a defect which relates to motor vehicle safety may exist in your vehicle, with the VIN shown above.

We apologize for this situation, and want to assure you that, with your assistance, we will, at no charge to you, correct this possible condition should an inspection of the affected parts determine that your particular vehicle has this defect. Our commitment to your safety, together with your dealer, is to provide you with the highest level of service and support.

What is the issue?

Possible loosening of lower steering yoke, at point of attachment to steering rack pinion, causing spine teeth to strip, which results in slippage of yoke at pinion gear. Yoke positioning and retaining bolt tightening processes may not have been properly followed during production, leading to potential inadequate spline coverage and tension at lower steering yoke. The potential consequence of this possible defect if left un-serviced may be loose steering or loss of steering. This is most likely to occur when the vehicle is in the stopped or slow moving condition, when forces are highest on the steering system components.

What will Columbia and your dealer do?

Columbia ParCar Corp has authorized your dealer to inspect the position and torque on the lower steering shaft yoke of your vehicle, and replace if either is not according to specifications. This work will be performed free of charge for parts and labor.

How long will this take?

The time required to complete the service is less than two hours. However, due to service scheduling requirements, your dealer may need advance notice to schedule an appointment for you.

What should you do?

Please call your dealer without delay and request a service appointment for Columbia Safety Recall SR11-001A. Provide the dealer with the VIN of your vehicle. The VIN is printed at the top of this letter. If you do not have a servicing dealer, you can contact Columbia ParCar at (800) 222-4653 for dealer addresses nearest you.

What should you do? (Continued)

Columbia ParCar Corp wants you to have this safety recall completed on your vehicle. The vehicle owner is responsible for making arrangements to have the work completed. Columbia ParCar Corp can deny coverage for any vehicle damage that may result from failure to have this recall performed on a timely basis. Therefore, please have this recall performed as soon as possible.

Please note: Federal law requires that any vehicle lessor receiving this recall notice must forward a copy of this notice to the lessee within ten days.

Have you previously paid for this repair?

If you have previously paid for a repair that addresses this issue specifically as described in this letter, you still need to have this recall performed to ensure the correct procedures were used.

You may be eligible for a refund of previously paid repairs. Refunds will only be provided for service related to the replacement of the lower yoke assembly. To verify eligibility and expedite reimbursement, give your paid original receipt to your dealer.

Refund requests may also be sent directly to Columbia ParCar Corp. To request your refund, send the refund request with all required documentation, including your original repair receipt (no photo copies), to Columbia ParCar Corp., Safety Recall SR11-001, 1115 Commercial Avenue, Reedsburg, WI 53959. Refund requests mailed to this address may take up to 60 days to process. Your original receipt will be returned to you.

What if you no longer own the vehicle?

If you no longer own this vehicle, and have an address for the current owner, please forward this letter to the new owner.

You received this notice because government regulations require that notification be sent to the last known owner of record. Our records are based on the vehicle registrations entered by the dealer at the time of sale, which indicate that you are the current owner.

Can we assist you further?

If you need assistance locating a dealer, or experience an excessive service delay, please contact Columbia ParCar Corp at (800) 222-4653. If you wish to contact us through email, our address is info@parcar.com.

If you are still having difficulty getting your vehicle repaired in a reasonable time or without charge, you may write the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Ave. S.E., Washington, D.C. 20590 or call the toll free Vehicle Safety Hotline at (888) 327-4236 (TTY: 800-424-9153) or go to www.safercar.gov.

Thank you for your attention to this important safety matter.

Columbia ParCar Corp.