

Safety Defect and Noncompliance Report Guide for Equipment  
**PART 573 Defect and Noncompliance Report**<sup>1</sup>

**On , 6 September 2012, Yakima Products, Inc. decided that a defect which relates to motor vehicle safety exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.**

**Date this report was prepared:** 2 October 2012

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

- 1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.**

Yakima Products, Inc.  
15025 SW Koll Parkway  
Beaverton, OR. 97006

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

Kevin Wendland  
Sr. Director of Quality Assurance

Yakima Products  
15025 SW Koll Parkway  
Beaverton, OR 97006

**Telephone Number:** 971-249-7554

**Fax No.:** 971-249-7751

**Name and Title of Person who prepared this report.**

Kevin Wendland  
Sr. Director of Quality Assurance

**Signed:**

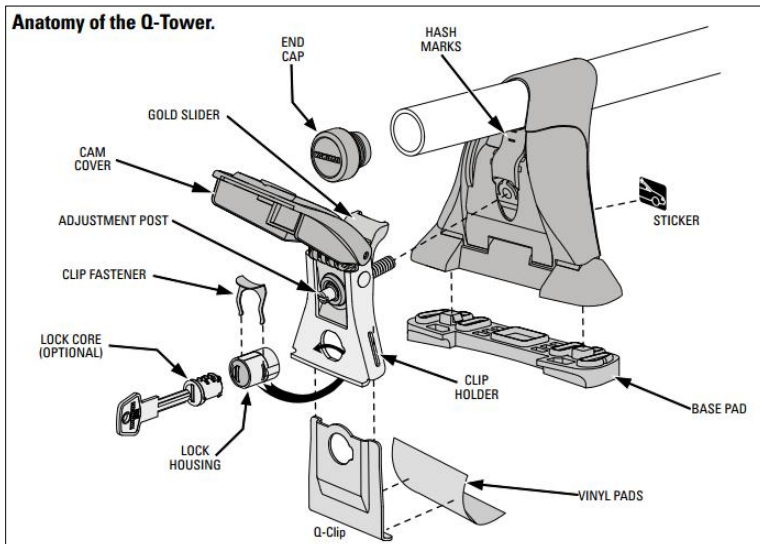
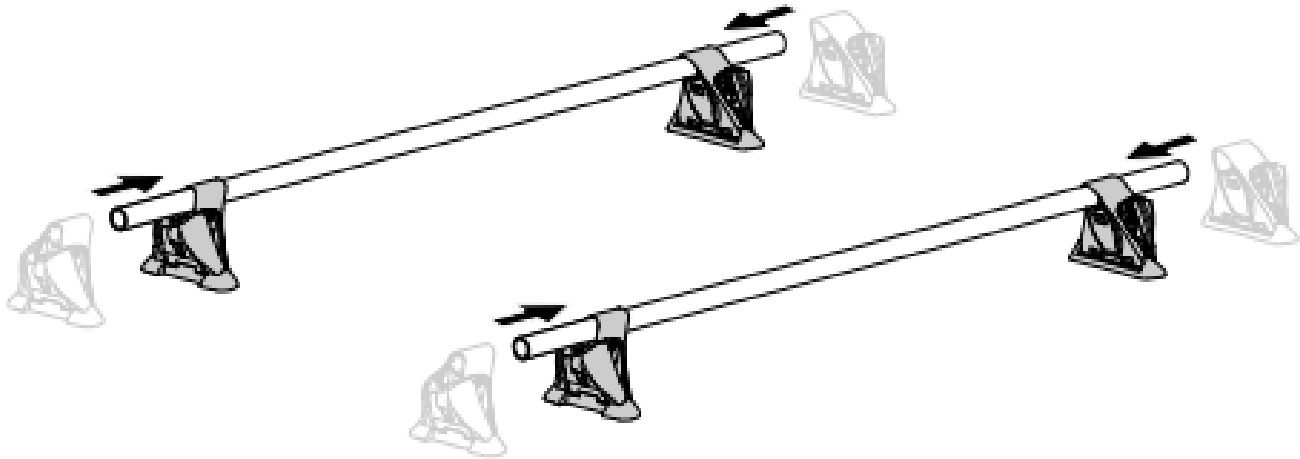


<sup>1</sup> Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or E-Mail to RMD.ODI@dot.gov.

## I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:



**Generic name of the item:** Vehicle Rooftop Rack System

**Make:** Yakima

**Model:** 2012-2013 Focus vehicles using Q-Tower and Q128 Clip

**Part Number:** 8000124 AND 8000728      **Size:** Rated for maximum 100 pound loads

**Function:** Provides cargo carrying capability on the top of a motor vehicle using various accessories

### **Other information which characterizes/distinguishes the items of equipment to be recalled:**

The Q-Tower and related Q128 Clip used in conjunction with the Ford Focus (2012-2013 4dr and 5dr models) has exhibited instability when heavily loaded and exposed to high wind forces. This combination of products was released in the Yakima on-line fit system in September of 2011 and published in the 2012 Yakima Fitting List. Since then, approximately 2100 of the Q128 kits have been sold. It takes two Q128 kits to fit out a Ford Focus on the front and back rack system.

**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 Equipment equipped with certain items of equipment from January 1, 1996, through April 1, 1997, then what was the percentage of the recalled Equipment of all Equipment manufactured during that time period.**

## **II. Identifying the Recall Population**

### **3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.**

Approximately 2100 Q128 kits have been sold since the system fit for the Ford Focus was released. It takes two Q128 kits to fit out a Ford Focus (one kit for the forward bar system and one kit for the rear bar system). Of the 2100 fit kits sold, an estimated 440 (220 vehicles) may have been fitted to the 2012-2013 Ford Focus. The remaining fit kits would have been sold for use on 18 other vehicle models that do not have an issue.

**4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance:** Yakima is assuming that 100% of 2012-2013 Ford Focus vehicles that have the Q-Tower and Q128 clip kit combination installed to be suspect. Yakima also believes that something changed in the Ford Focus (2012-2013 Model) after the fit system was created. Therefore, the population of Ford Focus cars with the Yakima system installed that have the recall condition is probably less than 100%. However, without firm knowledge when (or if) the Ford Focus changed, it is impossible to be sure what the actual percentage is so we are assuming the worst case scenario of 100%.

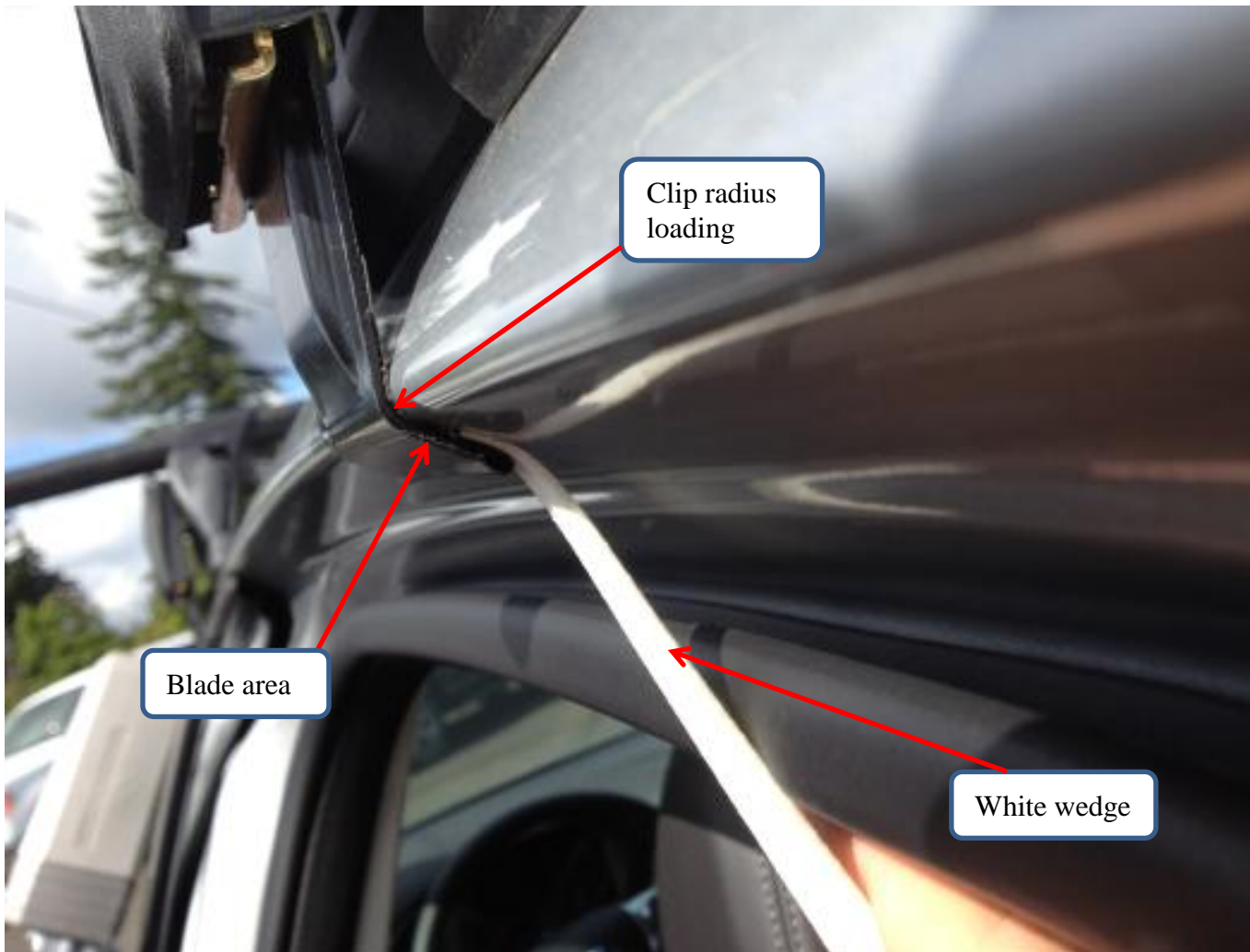
### **Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:**

The recall population is any Ford Focus (2012-2013 model year) with a Q-Tower and Q-Clip equipment combination attached to it. The suspect equipment combination was released in Yakima's on-line system in September of 2011 and subsequently published in hard copies of the 2012 Yakima Fitting List document used at retailers to facilitate Customer selection of Yakima cargo management gear. The quantity of vehicles affected was calculated by allocating sales over the 19 different vehicles that Yakima has specified to use the same Q-Tower and Q128 clip combination. A straight forward allocation predicts that 110 (2100 divided by 19) kits assemblies would have been sold for use on the Ford Focus (2012-2013 model year) vehicle. This would equate to 55 (two kits per system) Ford Focus vehicles having the suspect fit. This assumes an equal dispersion of kits over the 19 vehicles. However, to be conservative, Yakima quadrupled this value to get to a vehicle installation exposure total of 220 since historically newer vehicles tend to have higher installation rates than older vehicle models. Many of the 18 other models that require the Q-Tower/Q128 fit combination include older model years. Therefore the rate of fits would be lower than for a new model car such as the Ford Focus (2012-2013 model year).

### 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.

The noncompliance occurs where the Q-Clip system interfaces inside the door frame area just below the roofline of the vehicle. When a Q-Tower and Q-Clip combination of products is attached to a recently manufactured 2012-2013 model year Ford Focus (See below picture), the way in which the clip matches the door frame contour does not allow for full contact. The white wedge in the below picture highlights a gap between the door frame surface and clip blade surface. To be considered a good fit, such a gap should not exist. Without complete contact of the clip blade to the vehicle door frame surface, the potential for slipping of the rack system exists. In this case, the clip ends up loading on the radius of the clip which allows for insufficient clamping pressure of the system.



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

When the 2012-2013 model year Ford Focus fit was originally established (September 2011), the below pictures depict the way in which the clip matched up to the roofline attachment area. During the original fitting exercise, the clip closely matched the door frame profile which provided for optimal clamping pressure and performance of the system. As a result of this fit exercise, Yakima technical documentation and configurators (paper and web based) were released to specify the Q-Tower and Q128 clip combination for this vehicle.



**Original fit. Note: Good blade to vehicle contact**



Note: Subsequent to the release, Yakima suspects that a modification to the Ford Focus (2012-2013 model year) door frame profile. This is supported by the pictures of the original fit versus the pictures of the fit on later production vehicles. This change causes the Yakima specified fit combination for this vehicle to be non-viable.

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

In the absence of good clip blade to vehicle surface contact, the clamping pressure and related friction is insufficient. It can allow for the system to slide when loaded with accessory equipment (e.g., kayak carrier, bike carrier, cargo box, etc.) and related loads (e.g., kayaks, bikes, skis, camping equipment, etc). This situation is further exacerbated at high speeds of travel or in high wind conditions. Under worst case situations, the system can slide off the car.

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

- (a) While at rest, the system may slide when one braces themselves against the vehicle and pulls the tower.
- (b) After driving with the system installed, movement of the system may be evident particularly after
- (c) When in motion, the occupants of the vehicle may hear shifting or sliding noises

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

This situation is not the result of defective components or assemblies. It is a system application issue where all the individual pieces (Q-Tower, Q-Clip and vehicle) are not defective. However, when brought together as a system they do not function as needed. Therefore, no identification of individual supplier information is considered necessary.

**Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:**  
Not considered necessary as explained above.



## **V. 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.**

Not considered a defect in product or materials (go to 7 below).

**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.**

Between the 13<sup>th</sup> of April 2012 and 13<sup>th</sup> of September 2012, seven Customer complaints related to 2012-2013 Ford Focus vehicle owners who had installed the Q-Tower an Q-128 clip system were received and settled. Three of the claims were due to damage caused to vehicles and four were due to equipment being ejected from the vehicle. Given the relatively low volume of vehicles estimated to have the noted system, this level of complaints was considered to be abnormally high and triggered the investigation to determine cause which validated there was in fact an issue as described previously herein.

## **V. Identify the Remedy**

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

Remedy: The product can be returned to the manufacturer (Yakima Products) or the retailer for refund. No replacement equipment is available at this time.

Recall Condition: Any owner of a 2012-2013 model year Ford Focus that purchased a Yakima vehicle rack system consisting of a Q-Tower (P/N 8000124) and two Q-Clip (P/N 8000728) finished goods.

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

The only remedy for this situation is for the consumer to contact Yakima directly as specified in the Consumer Letter. The intent is to provide the consumer a refund equal to the purchase price paid for the rack system. There is no replacement system available for the 2012-2013 model year Ford Focus at this time. One may be available at a later date, but the current plan is to not support this model vehicle as it will require hardware development effort to create a system that is compatible.

**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.**

The vehicle rack system (combination of Q-Tower and Q-128 clips) for the 2012-2013 model year Ford Focus has been discontinued (removed from fit configurators).

## **VI. Identify the Recall Schedule**

**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.**

### **1 October 2012**

- Submit NHTSA notification

### **3 October 2012**

- Submit consumer notification letter to NHTSA for review and approval
- Submit dealer notification letter NHTSA for review and approval

### **8 October 2012**

- Independent Sales Rep Notification
- Distribute dealer and consumer letters
- Collect consumer sell-through and contact information
- Publish web page on yakima.com and our dealer website to inform consumers and dealers of the issue

## **VII. Furnish Recall Communications**

**9. 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 (RMD.ODI@dot.gov) for review prior to mailing.**

**Note: These documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.**