



June 29, 2012

Jennifer Timian
Chief, Recall Management Division
National Highway Traffic Safety Administration
NVS-215, Room W46-421
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Ms. Timian,

The following information is submitted in accordance with National Highway Traffic Safety Administration's reporting regulations, 49CFR Part 573.6.

Zero Motorcycles Inc. has decided that a defect which relates to motor vehicle safety exists on certain model year 2011 and 2012 Zero Motorcycles motorcycles.

IDENTIFICATION OF EQUIPMENT POTENTIALLY CONTAINING THE DEFECT:

The recall population of 450 motorcycles includes 2011 model year Zero S motorcycles built March 07, 2011 through November 04, 2011; 2011 model year Zero DS motorcycles built March 07, 2011 through November 04, 2011; 2011 model year Zero XD motorcycles built March 14, 2011 through June 27, 2011; 2011 model year Zero MXD motorcycles built March 06 2011 through July 21, 2011; 2011 model year Zero XU motorcycles built March 09, 2011 through September 26, 2011; 2012 model year Zero S motorcycles built December 27, 2011 through March 14, 2012; 2012 model year Zero DS motorcycles built December 22, 2011 through March 19, 2012; 2012 model year Zero X motorcycles built December 19, 2012 through March 19, 2012; and 2012 model year Zero XU motorcycles built February 13, 2012. This covers the entire range of motorcycles potentially containing the subject defect.

DESCRIPTION OF DEFECT:

The subject motorcycles have a front brake system brake-light switch that actuates at a brake lever travel point within a specified range. This brake lever travel range specification has been deemed too broad relative to ensuring that, on every motorcycle within the subject population, the switch actuation point and corresponding brake-light activation occur prior to moderate front brake application. This condition, if present on a motorcycle within this population, could lead to the brake-light not activating when moderate front braking is applied. Failure of the brake-light to activate when slowing down the motorcycle using moderate front braking may cause a diminished alert to drivers behind the motorcycle, which could lead to a possible crash and potential injury or death of the rider.

CHRONOLOGY OF EVENTS:

On 03/14/2012, Zero Motorcycles' Customer Service department was performing an internal Quality Control audit that highlighted a longer than expected brake lever travel prior to brake-light switch actuation. This was reported to Zero Motorcycles' Engineering Department, which conducted a few tests on its Engineering fleet of motorcycles that corroborated this concern.

On 03/15/2012, Zero Motorcycles contacted its brake system supplier, Hayes Brakes, alerting them of this concern. Over the next several weeks, Zero Motorcycles and Hayes Brakes collaborated in conducting multiple laboratory tests and analyses in order to best understand the nature and effect of this concern.

On 03/19/2012, Zero Motorcycles implemented a screening procedure at the end of its assembly line to ensure no vehicles would be shipped with this concern.

On 05/07/2012, Zero Motorcycles shipped a motorcycle to Hayes Brakes in order to conduct on-road testing as part of the continuing investigation into this concern.

On 05/30/2012, Zero Motorcycles received the on-road test report from Hayes Brakes. Over the next few days, Zero Motorcycles and Hayes-Brakes collaborated on the joint analysis of this and every other test report and analysis.

On 06/07/2012, this concern was brought to the attention of Zero Motorcycles' Product Integrity Team. This group spent the next two weeks analyzing all of the data and consulting with Hayes Brakes to ensure a good understanding of the concern and its possible effects.

On 06/22/2012, Zero Motorcycles completed its internal investigation of this concern and concluded that the front brake system brake-light switch used on 2011 and 2012 model year S, DS, XD, MXD, X and XU motorcycles built on or prior to March 19, 2012 could have a brake lever switch actuation point that may allow moderate front braking without brake-light activation, which could lead to a diminished alert to drivers behind the motorcycle. Zero Motorcycles executive management considered this information and determined that a defect related to motor vehicle safety existed.

Zero Motorcycles has not received of any customer or dealer complaint or report, via Warranty or otherwise, of this concern in the field. Zero Motorcycles is not aware of any accidents or injuries caused by this condition.

DESCRIPTION OF THE PROGRAM TO REMEDY THE DEFECT:

The remedy of this defect is for authorized Zero Motorcycles dealers to inspect and, if determined necessary per this program's Service Bulletin instructions, replace the front brake system brake-light switch with a switch manufactured to a revised actuation range that ensures brake-light activation prior to moderate front braking action.

SUPPLIER INFORMATION:

HAYES BRAKES

5800 W. Donges Bay Rd., Mequon, Wisconsin 53092 USA

Tel: (262) 242-4300

Fax: (262) 242-0524

President: Rand McNally

Contact Person: NOAH TREIBER

DEALER AND OWNER NOTIFICATION:

Zero Motorcycles expects to notify its dealer network no later than the week of July 02, 2012 and the motorcycle owners no later than the week of July 16, 2012.

Part 577 NOTICE LETTER:

A draft of the owner notification letter is attached.

Please advise the undersigned of the campaign assigned by ODI to this recall.

Sincerely,



Richard Kenton
Director of Customer Service
Zero Motorcycles, Inc.