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July 12, 2012

Via Fed-Ex Next Day Service & Electronic Mail

U.S. Department of Transportation
Attn: O. Kevin Vincent
1200 New Jersey Avenue, S.E.
West Building, W41-326
Washington, D.C. 20590

In re:)
)
Wildfire MY2009 WF650-C Motorcycles)
NHTSA Recall No. 12V-031)
)

**ANSWERS AND RESPONSES TO NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION'S SPECIAL ORDER INCLUDING
REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW COMES Snyder Computer Systems, Inc., d.b.a. Wildfire Motors and hereby responds to the Special Order Interrogatories and Request for Production of Documents propounded by the National Highway Traffic Safety Administration as follows:

Interrogatories:

1. a. Identify in detail each and every part that is to be installed on MY2009 WF650-C motorcycles as part of the remedy under the recall number designated by NHTSA as

12V-031 (hereinafter recall number 12V-031).

Answer:

- **Dual brake fluid reservoirs each with its own labeled filler cap.**
- **Red brake failure indicator lamp.**
- **Hydraulic failure switch.**
- **Front & rear high friction brake shoes.**

By: Don Snyder
As of: July 11, 2012

b. On May 2, 2012, Stuart Seigel, an employee with NHTSA's Office of Vehicle Safety Compliance (OVSC), sent an email to Mr. Alan Tipton, an employee of Wildfire, requesting certain information. Mr. Tipton responded on May 10, 2012 (hereinafter "May 10, 2012 response"). The May 10, 2012 response indicated that Wildfire was including the installation of power brakes as part of the remedy for MY2009 WF650-Cs. Please carefully describe these power brakes, including the manufacturer and model number of the power brake booster, whether the booster is powered by electric or vacuum, how the booster operates and where and how the booster will be installed as part of the remedy.

Answer:

Power brakes will not be installed. The stopping distance is the same.

By: Don Snyder
As of: July 11, 2012

- c. The May 10, 2012 response also indicated that Wildfire will (1) replace the non-conforming brake fluid reservoir with conforming brake reservoirs, (2) add the required reservoir labeling, (3) install a warning lamp indicating brake failure, and (4) replace the front and rear brake shoes. For each of the items 1-4 above, provide answers to the following:
- i. Fully describe the parts, including the manufacturer and part number;

Answer:

The parts, as fully described in the Answer to Interrogatory No. 1(a) above, are manufactured by Taixing Sandi Motorcycle Co., Ltd. and no part numbers are used.

By: Don Snyder
As of: July 11, 2012

- ii. State how the part will be installed as part of the remedy.

Answer:

- **Dual brake fluid reservoirs with separate labeled filler caps will replace the existing reservoir and cap.**
- **A hydraulic failure switch will be installed on the master cylinder.**
- **A red warning lamp indicating brake failure will be installed in the dash.**
- **High friction front and rear brake shoes will replace the existing front and rear brake shoes.**

By: Don Snyder
As of: July 11, 2012

d. State in detail how each of the parts identified in your response to Interrogatory No. 1(a) will be installed on a MY2009 WF650-C. You do not need to repeat information provided in your response to Interrogatory No. 1(b) and Interrogatory No. 1(c).

Answer:
See Answers to Interrogatory Nos. 1(b) & (c).

By: Don Snyder
As of: July 11, 2012

2. a. Describe in detail any adjustments Wildfire will make to any MY2009 WF650-Cs, before, during, or after the parts identified in your response to Interrogatory No. 1 above are installed as part of the remedy in recall number 12V-031.

Answer:
The brakes will be bled and adjusted.

By: Don Snyder
As of: July 11, 2012

- b. To the extent these adjustments will vary between MY2009 WF650-Cs, state what other adjustments Wildfire will make on other MY2009 WF650-Cs.

Answer:
None.

By: Don Snyder
As of: July 11, 2012

3. Wildfire's owner letter notification letter submitted to NHTSA for safety recall number 12V-031 indicated that labor time for the replacement and installation of the replacement parts in recall number 12V-031 is approximately 2 hours. Wildfire also indicated in its May 10, 2012 response to NHTSA that approximately 2 hours is required for the repair. State in detail the basis for this estimate of approximately 2 hours. Is this estimate still accurate? If not, what is the expected labor time?

Answer:

Wildfire performed it to see how long it would take.

By: Don Snyder

As of: July 11, 2012

4. a. Will Wildfire's remedy(ies) in recall number 12V-031, based on the parts identified in your response to Interrogatory No. 1(a) and the adjustments identified in your response to Interrogatory No. 2, make the repaired MY2009 WF650-Cs comply with all applicable requirements of FMVSS No. 122?

Answer:

According to Taixing Sandi Motorcycle Co., Ltd., yes.

By: Don Snyder

As of: July 11, 2012

- b. If your answer to Interrogatory No. 4(a) is yes, state each and every basis, including but not limited to describing in detail each and every test and analysis, and all other relevant materials that Wildfire considered or relied upon in determining that the remedy(ies) for MY2009 WF650-C vehicles will make the vehicles comply with all requirements of FMVSS No. 122. Also state in detail the method by which the MY2009 WF650-C motorcycles' compliance to all the requirements of FMVSS No. 122 was determined.

Answer:

Taixing Sandi Motorcycle Co., Ltd. told us they did and they certified them.

By: Don Snyder

As of: July 11, 2012

- c. If your answer to Interrogatory No. 4(a) is no, state whether Wildfire will now elect the remedy of repurchasing the MY2009 WF650-Cs.

Answer:

See Answer to Interrogatory No. 4(a).

By: Don Snyder

As of: July 11, 2012

5. If your answer to Interrogatory No. 4(a) is no, and Wildfire is not electing to repurchase the vehicles, state in detail: (i) what Wildfire will do to develop and implement a repair of MY2009 WF650-Cs that will make the vehicles comply with all the requirements of FMVSS No. 122 and (ii) the date by which all those items in your response to (i) will be completed.

Answer:

See Answer to Interrogatory No. 4(a). Wildfire hopes to have all of the vehicles repaired by September 5, 2012.

By: Don Snyder
As of: July 11, 2012

6. In your March 23, 2012 response to a March 14, 2012 letter from Jennifer Timian of the Recall Management Division (RMD) of NHTSA, you stated that the compliance with FMVSS No. 122 is being tested at a third party test facility.

a. Identify the facility, including name, address, telephone number and contact person there.

Answer:

We have asked Taixing Sandi Motorcycle Co., Ltd. for that information and do not have it yet.

By: Don Snyder
As of: July 11, 2012

b. Describe in detail the testing that has been done or that will be done.

Answer:

See Answer to Interrogatory No. 6(a).

By: Don Snyder
As of: July 11, 2012

c. Has this testing been started? If so, when?

Answer:

We are not sure. The manufacturer said it was.

By: Don Snyder
As of: July 11, 2012

d. If the testing has not been started, when will it start?

Answer:

See Answer to Interrogatory No. 6(c).

By: Don Snyder
As of: July 11, 2012

e. Has this testing been concluded? If so, when?

Answer:

N/A

By: Don Snyder
As of: July 11, 2012

f. If this testing has not been concluded, when do you expect it to be concluded?

Answer:

N/A

By: Don Snyder
As of: July 11, 2012

7. For each test related to the compliance of MY2009 WF650-C motorcycles with FMVSS No. 122, regardless of whether performed in-house by Wildfire or performed by an outside entity, describe in detail each such test, including the date of the test, the name of Wildfire's test personnel or the name and address of the testing facility, a detailed description of the test, and a complete summary of the test results.

Answer:

See Answers to Interrogatory Nos. 6(a) through (f) as well as the information contained on the test reports/results produced in response to Request for Production of Documents No. 7(a).

By: Don Snyder
As of: July 11, 2012

8. As you are aware, NHTSA is planning on testing the NHTSA-owned MY2009 WF650-C after the remedy has been implemented on it. State all additional modifications or adjustments that Wildfire believes must be made to NHTSA's MY2009 WF650-C prior to the testing, after all parts identified in response to Interrogatory No. 1 are installed as part of the remedy in recall number 12V-031 and all adjustments identified in response to Interrogatory No. 2 are made.

Answer:

None.

By: Don Snyder
As of: July 11, 2012

9. State whether Wildfire plans to do anything else to NHTSA's MY2009 WF650-C after the vehicle has been repaired with the parts identified in your response to Interrogatory No. 1 and/or adjusted as described in your response to Interrogatory No.

2. If so, describe with specificity exactly what Wildfire will do to the vehicle.

Answer:

None.

By: Don Snyder

As of: July 11, 2012

10. State whether the remedy to be installed on NHTSA's MY2009 WF650-C vehicle is the same remedy to be installed as the remedy on all other MY2009 WF650-Cs.

Answer:

Yes.

By: Don Snyder

As of: July 11, 2012

11. Wildfire's May 10, 2012 response indicated that if NHTSA's MY 2009 WF650-C vehicle is picked up from TRC, the vehicle can be expected to be back to TRC in 5 business days. What is the anticipated transport time from TRC to Wildfire? How long will it take Wildfire to repair NHTSA's MY2009 WF650-C? Beyond the repair under recall number 12V-031, what else does Wildfire plan to do on or with NHTSA's MY2009 WF650-C?

Answer:

The anticipated transport time from TRC to Wildfire is approximately 4 hours and 16 minutes. It will take Wildfire approximately 2 hours to repair as stated in the recall number 12V-031. Wildfire plans to test the vehicle braking before and after the repairs are made.

By: Don Snyder

As of: July 11, 2012

12. a. Has Wildfire prepared instructions for its dealers for the repair of the MY2009 WF650-C under recall number 12V-031?

Answer:

We are still working on it.

By: Don Snyder

As of: July 11, 2012

b. If the answer to Interrogatory No. 12(a) is yes, when were the instructions prepared?

Answer:

See Answer to Interrogatory 12(a).

By: Don Snyder
As of: July 11, 2012

c. If the answer to Interrogatory No. 12(a) is no, when does Wildfire plan to prepare these instructions?

Answer:
See Answer to Interrogatory No. 12(a).

By: Don Snyder
As of: July 11, 2012

13. a. Has Wildfire sent instructions to its dealers for the repair of the MY2009 WF650 -C under recall number 12V-031?

Answer:
No.

By: Don Snyder
As of: July 11, 2012

b. If the answer to Interrogatory No. 13(a) is yes, when were the instructions sent to dealers?

Answer:
See Answer to Interrogatory No. 13(a).

By: Don Snyder
As of: July 11, 2012

c. If the answer to Interrogatory No. 13(a) is no, when does Wildfire plan to send the instructions to its dealers?

Answer:
July 20, 2012

By: Don Snyder
As of: July 11, 2012

14. Identify each owner of a MY2009 Wildfire WF650-C to whom Wildfire has sent an owner notification letter of recall number 12V-031 (*see* 49 USC 30118©, 49 USC 30119, and 49 CFR 577.5) and for each, state his/her or its address and the date the letter was sent.

Answer:
See attached list.

By: Don Snyder
As of: July 11, 2012

15. Your owner letter submitted to NHTSA (available at <http://www.odi.nhtsa.dot.gov/acms/cs/jaxrs/download/doc/UCM419717/RCONL-12V031-0124.pdf>) indicated that replacement parts should be available after May 14, 2012. Are all the parts required for the repair identified in Interrogatory No. 1(a) above available for immediate installation? If not, why not, and when are the parts expected to be available?

Answer:
No. The manufacturer still has the required parts on backorder and they are expected to be available by July 20, 2012.

By: Don Snyder
As of: July 11, 2012

16. a. Has Wildfire, itself or through its dealers, begun repairing MY2009 WF650-Cs under recall number 12V-031?

Answer:
Yes.

By: Don Snyder
As of: July 11, 2012

b. If the answer to Interrogatory No. 16(a) is yes, for each MY2009 WF650-C that has been repaired, state the VIN of the vehicle repaired and the name, address and telephone number of the owner or other contact.

Answer:
None. MY2009 WF650-C vehicles with VINs LTDKDVZ129TWF0112 and LTDKDVZ149TWF0127 are in our possession and have been worked on. The owner of both vehicles is Trader Bill Wildfire Motors, 3110 Ogden Hwy., Adrian, MI 49221.

By: Don Snyder
As of: July 11, 2012

c. If the answer to Interrogatory No. 16(a) is yes, is the repair for these vehicles identical to that for NHTSA's MY2009 WF650-C?

Answer:

N/A

By: Don Snyder
As of: July 11, 2012

d. If the answer to Interrogatory No. 16(a) is no, state when Wildfire, itself or through its dealers, plans to begin repairing MY2009 WF650-Cs under recall number 12V-031.

Answer:
See Answer to Interrogatory No. 16(a).

By: Don Snyder
As of: July 11, 2012

Request for Production of Documents:

1. Provide a parts list for recall number 12V-031. Your parts list must include the quantity of each part required, part number of each part, and a description of each part.

Answer:
See Answers to Interrogatory Nos. 1(a) & (c).

By: Don Snyder
As of: July 11, 2012

2. Provide all documents describing or depicting each part to be installed on MY2009 WF650-C as part of the remedy for recall number 12V-031.

Answer:
See sample Owner Notification Letter and sample Dealer Notice previously provided to NHTSA on April 23, 2012 attached.

By: Don Snyder
As of: July 11, 2012

3. In Interrogatory No. 1 you were asked to provide information regarding power brakes. Provide documents relating to the specifications, performance, installation, and operation of these power brakes.

Answer:
See Answer to Interrogatory No. 1(b).

By: Don Snyder
As of: July 11, 2012

4. In Interrogatory No. 1 you were asked to provide information regarding brake fluid reservoir, reservoir labeling, warning lamp, and front and rear brake shoes. Provide documents relating to the specifications, performance, installation, and operation of these items.

Answer:

None in Wildfire's possession.

By: Don Snyder

As of: July 11, 2012

5. Provide documents relating to the length of time to repair/remedy the MY2009 WF650-C or part thereof. Provide all documents underlying or supporting Wildfire's estimate that the repair will take 2 hours.

Answer:

None exist.

By: Don Snyder

As of: July 11, 2012

6. Provide copies of all testing and compliance information related to Wildfire's remedy for the MY2009 WF650-C's non-compliance with FMVSS No. 122. Include those results where Wildfire determined that the repaired MY2009 WF650-C vehicle did not comply with FMVSS No. 122.

Answer:

Wildfire has not determined that the repaired MY2009 WF650-C did not comply with FMVSS No. 122, therefore, no such documents exist.

By: Don Snyder

As of: July 11, 2012

7. For each test of MY2009 WF650-C related to FMVSS No. 122, regardless of whether performed in-house by Wildfire or performed by an outside entity:
 - a. Produce a copy of each such result of a test, and related test report. Produce copies of all documents and other information relating to each such test. For each test, provide any relevant electronic data with a description of the format used for the data. For each test film or video produced, specify the film/video speed and explain any timing or dimensional reference marks on the film/video.

Answer:

See answers to Interrogatory Nos. 6(a) through (f) and the attached test reports/results.

By: Don Snyder
As of: July 11, 2012

b. Produce a copy of all test procedures used, a complete list of the instrumentation used and all relevant calibration information (dates of calibration and documentation of traceability to the national standards).

Answer:

See answers to Interrogatory Nos. 6(a) through (f) as well as the answer to Interrogatory Nos. 4(a) & (b).

By: Don Snyder
As of: July 11, 2012

8. Apart from test results identified in your response above, produce a copy of each and every analysis and all other relevant materials that Wildfire considered or relied upon in determining that the remedies currently identified will make the repaired MY2009 WF650-Cs comply with all applicable requirements of FMVSS No. 122.

Answer:

See answers to Interrogatory Nos. 4(a) & (b).

By: Don Snyder
As of: July 11, 2012

9. Provide a copy of all instructions or other documents that have been sent to Wildfire's dealers referring or relating to the MY2009 WF650-C or the repair thereof, including all technical instructions.

Answer:

See Answers to Interrogatory Nos. 12(a) through (c), 13(a) through (c) and see sample Dealer Notice previously provided to NHTSA on April 23, 2012 and produced in Request for Production of Documents No. 2.

By: Don Snyder
As of: July 11, 2012

10. Provide all documents prepared for dealers describing the repair of the MY2009 WF650-C or referring or relating to recall number 12V-031. Include all documents, whether draft or final.

Answer:

See Answers to Interrogatory Nos. 12(a) through (c), 13(a) through (c) and see sample Dealer Notice previously provided to NHTSA on April 23, 2012 and produced in Request for Production of Documents No. 2.

By: Don Snyder
As of: July 11, 2012

11. Provide all documentation of any repairs to MY2009 WF650-C motorcycles as part of the remedy for recall number 12V-031 done to date.

Answer:
None exist.

By: Don Snyder
As of: July 11, 2012

Respectfully Submitted,

SNYDER COMPUTER SYSTEMS, INC.,
d.b.a. Wildfire Motors,

BY:



DON SNYDER
President

VERIFICATION

County of Jefferson,
State of Ohio, SS:

The undersigned hereby certifies that the answers provided above are true and accurate to the best of affiant's knowledge.

Snyder Computer Systems, Inc.,
dba Wildfire Motors

BY:

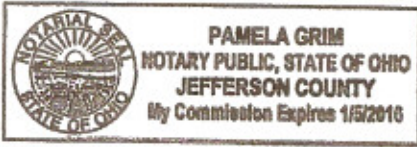


Signature

Don Snyder

Print Name

Sworn to and subscribed in my presence this 12th day of July, 2012.





NOTARY PUBLIC