

PART 573 Defect and Noncompliance Report
(Equipment)

On or about February 15, 2013 Quadratec, Inc. and its supplier (identified below) determined that a defect which relates to motor vehicle safety exists in an unknown number of items of replacement vehicle equipment listed below. Quadratec, Inc. hereby furnishes notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: February 22, 2013

Manufacturer's identification code for this recall (if applicable): 13-01

1 (a.). Full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. Quadratec, Inc. 1028 Saunders Lane, West Chester, Pa 19380 is the owner of the Quadratec® trademark and Ultimate Floor Liner brand used with the equipment to be recalled. The fabricating manufacturer of this Floor Liner is ***Jacobson Plastics Inc. 1401 Freeman Avenue, Long Beach, California 90804-2499***

1(b.) Identify the corporate official, by name and title, whom the agency should contact with respect to this recall. John Stewart, President Quadratec, Inc., c/o Robert R. Gillanders Atty., Colvos Law, PLLC

Telephone Number: 800/745-5337 (Ext. 312) (Quadratec direct dial), 253/229-0708 (Colvos Law, direct dial), E-mail: Rgillanders@Colvos-Law.com

Name and Title of Person who prepared this report.

Robert R. Gillanders
Principal
Colvos Law, PLLC
Attorney, Quadratec, Inc.

Signed: */S/ Robert R. Gillanders*
Robert R. Gillanders

I. Identify the Recalled Items of Equipment

Generic name of the item: Ultimate Floor Liner by Quadratec® (hereafter the “Floor Liners”)

Make, Model & Part Numbers: Ultimate Floor Liner by Quadratec® Front, drivers side for: 2007-2013 Jeep® Wrangler®, part #s, 14254.0301 07, 14254.0301 08, 14254.0301Q, 14254.0302 07, 14254.0302 08, 14254.0302Q, 14254.0303 07, 14254.0303 08, 14254.0303Q, 14254.0309 07, 14254.0309 08, 14254.0309Q); **Function:** deep-molded replacement floor liner intended to separate and contain dirt, water and debris from vehicle interior.

Other information which characterizes/distinguishes the items of equipment to be recalled: The Ultimate Floor Liner is black flexible plastic material with distinctive tread design and Quadratec® trademark.

Quadratec® is voluntarily recalling all Ultimate Floor Liner by Quadratec® Front, drivers side floor liners of the above model and part numbers sold between approximately May 1, 2012 and February 14, 2013.

II. Identifying the Recall Population

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

Approximate Number of Items: 15,836

Model Year Potentially Involved

Total Number Potentially Affected by the Recall: Approximately 15,836 individual front, drivers’ side Ultimate Floor Liners by Quadratec® used as replacement equipment in an approximately equal number of 1997-2013 Jeep® Wranglers.

Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance: Unknown but thought to be less than 100% based on nature of defect and suspected contributing causes of Floor Liner tearing in anchor area (see description below). High summer temperatures in unvented vehicles is suspected to weaken liner material in area of anchor which may then tear under heavy loads.

The recall population was selected based upon the similarity of the anchor point design and the manufacturers' use of identical materials for all floor liners sold during May 1, 2012 to February 14, 2013.

III. Description of Defect

The defect is the plastic material around the Floor Liner anchor point may tear during use, or high loading, particularly when exposed to elevated summer temperatures in unvented vehicles. Tearing around the anchor point may allow the Floor Liner to shift forward, creating a risk of contacting or impeding operation of vehicle's accelerator which may create a risk of unintended acceleration and accident. Warning of the defect and consequences are provided by visible tearing at the anchor point and movement of the Floor Liner greater than when originally installed.

The manufacturer/supplier of this item of replacement equipment is: Jacobson Plastics Inc., 1401 Freeman Avenue, Long Beach, California 90804-2499.

Name and title of the chief executive officer or knowledgeable representative of the supplier: Jeff Jacobson.

IV. Chronology in Determining the Defect/Noncompliance

These Floor Liners were first sold by Quadratec® on or about May 1, 2012. The Ultimate® Floor Liner replacement for these Jeep® vehicles has been well received by customers with warranty returns for all reasons relatively small. During August of 2012, however, Quadratec® customer service and product quality staff noticed some returned Floor Liners having small tears in the area of the anchor point. Ongoing review of available returned Floor Liners indicated approximately 14 front Floor Liners suggested similar tearing. Quadratec® observed tearing appeared to decrease during cooler weather and further analysis of previous returns generally supported the belief tearing around the Floor Liners anchor point was more common in areas known for high summer temperatures. In connection with its investigation, Quadratec® staff have been working with the manufacturer to develop a means of reinforcing the anchor point. Quadratec® is aware of no injuries or highway accidents thought to be related to this defect. Quadratec® has received at least one customer complaint regarding Floor Liner tearing and expressing concerns regarding Floor Liner movement.

V. The Proposed Remedy

Quadratec® is proposing an inspection and repair/upgrade campaign for this replacement equipment furnishing all customers of the identified Floor Liners with a simple Hook Guard kit reinforcing the Floor Liner around the anchor point.



Any Floor Liner that upon inspection is torn will be replaced with a new Floor Liner including the reinforcing Hook Guard without charge. Quadratec®'s customer base is largely Jeep® enthusiasts with good mechanical skills, suggesting most customers will easily install the Hook Guard kit themselves. Customers who are unable or unwilling to install the Hook Guard kit may elect to return their Floor Liner to Quadratec® for a no-cost exchange Floor Liner with Hook Guard kit installed. Given the nature of the problem (tearing), Quadratec® believes it is unlikely customers would attempt to repair rather than return Floor Liners. Nonetheless, Quadratec® will comply with part 577.11 through a reimbursement plan providing customers who establish they paid to repair their Floor Liner prior to receipt of the recall notice an exchange without cost of their repaired Liner for a new liner with reinforcement Hook Guard installed.

Remedied Floor Liners are readily distinguishable from the recalled part by the visible reinforcement ring in the anchor area.

Ultimate Floor Liners by Quadratec® produced after February 14, 2013 will include a reinforcing Hook Guard in the anchor area. The reinforced Floor Liners are the same as the remedied liners. Additionally, Quadratec® is exploring base material alterations with the supplier.

VI. Proposed Recall Schedule

In cooperation with its supplier, Quadratec® is receiving sufficient Hook Guard kits to meet expected customer demand. Quadratec® is the exclusive distributor of the Ultimate Floor Liners and has computerized records of customers. It is anticipated customer recall notifications can begin to be mailed within 10 days of NHTSA's approval or on or about March 1, 2013. Quadratec® does not anticipate any problems in accomplishing this schedule or the recall remedy.

VII. Recall Communications

Quadratec® is aware of no prior written communications regarding this defect or recall campaign sent to more than one customer. A copy of the proposed customer notification under part 577 is attached.