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Fastec Industrial Corp, a division of WESCO Distribution, Inc.
225 West Station Square Drive, Suite 700
Pittsburgh, PA 15219-1122

Part 573 Report

Date: July 11, 2013

This report serves as notification by Fastec Industrial Corp. ("Fastec"), a division of WESCO Distribution, Inc. ("WESCO"), to the National Highway Traffic Safety Administration ("NHTSA") that a motor vehicle safety-related issue exists in certain travel trailer locks sold by Fastec for installation in the doors of Recreational Vehicles ("RVs").

I. Manufacturer, Designated Agent, and Other Chain of Distribution Information

Filing Firm Name (private labeler and distributor): Fastec Industrial Corp., a division of WESCO Distribution, Inc.

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Filing Firm is:

WESCO is located in Pittsburgh, PA, and its Fastec division is located in Elkhart, IN. Fastec designed, imported and distributed the potentially affected locks under its Fastec Industrial brand name using the "FIC" trademark. Fastec overwhelmingly sold the potentially

affected locks to OEM RV door manufacturers and RV manufacturers for incorporation into RVs.

Manufacturer: Zhongshan Huafeng Locks Co., Ltd. ("Huafeng")
South of Yongning Industrial Avenue
Xiaolan Town, Zhongshan, Guangdong
People's Republic of China

Fastec invited Huafeng, the sole manufacturer of the potentially affected locks, to join the recall process, but Huafeng declined. The manufacturing plant is located in Guangdong, China.

Vehicle and component part manufacturers that purchased the equipment: See Exhibit 3

II. Identification of the Recall Population and Its Size

Type of equipment:

The product consists of certain travel trailer locks with a keyed paddle handle and deadbolt (the "locks") installed in the doors of Recreational Vehicles ("RVs"). Zhongshan Huafeng Locks Co., Ltd. ("Huafeng") manufactures the locks, including the key cylinders used to operate the locks. Fastec designed, imports and distributes the locks as a private labeler using its FIC trademark. The locks are sold primarily to OEM RV door manufacturers and, in turn, as part of the RV door, to RV manufacturers. Fastec also sells directly to OEM RV manufacturers and sells a limited volume of replacement RV door locks as a "do it yourself" product directly to consumers via the Fastec Industrial website and the company's toll free number: (800) 837-2505.

Brand:	Fastec Industrial ("FIC")
Model Nos:	43610-00 (Chrome), 43610-06 (Black), 43610-09 (White), 40610-00 (Chrome), 40610-06 (Black), 40610-09 (White), 44610-03 (Chrome), 44610-06 (Black), 44610-09 (White)
Key Codes:	HF-304, HF-307, HF-308, HF-309, HF-311, HF-313, HF-315, HF-316, HF-320, HF-322, HF-323, HF-328, HF-331, HF-335, HF-336, HF-339, HF-342, HF-343, HF-347, and HF-349
Serial Nos:	N/A
Date Codes:	January 2006 – April 2013.
UPC:	N/A
Retail Price:	N/A

Total Product Sold:

Fastec's records indicate that a total of approximately 2,864,670 deadbolt RV door locks with one of the 9 model numbers were sold between January 1, 2006 and April 25, 2013 (the "Recall Period"). This total includes locks with any key code, not just the 20 key codes that subsequent testing suggests may be affected.

Exclusive of cash sales, Fastec believes that, during the Recall Period, it sold travel trailer locks to the OEM RV industry customers (*e.g.*, RV door makers, RV manufacturers, etc.) set forth in Exhibit 3 who are still in business today.

Current Inventory Estimates:

All of the potentially affected deadbolt RV door locks were manufactured by Huafeng from January 2006 through April 2013. Huafeng sold a total of approximately 2,864,670 deadbolt RV door locks with one of the 9 model numbers to Fastec during the Recall Period. This total includes locks with any key code, not just the 20 key codes that subsequent testing suggests may be affected. Huafeng advised Fastec that Huafeng has ceased production of any potentially affected locks and has pulled all such potentially affected locks from its inventory.

Fastec has reviewed its current inventory of locks and has removed all potentially affected locks from its inventory. Additionally, Fastec is manually testing every lock in its current inventory prior to shipment to its customers to ensure that the lock performs in accordance with the design specifications.

Fastec sold an unknown number of potentially affected locks directly to consumers during the Recall Period. As noted, Fastec primarily sold the locks to OEM RV door manufacturers and RV manufacturers. Fastec does not know how many potentially affected locks have been incorporated in RVs owned by consumers, but it believes that most of the potentially affected locks are in the hands of consumers.

Percentage of Recall Population Estimated to be Affected:

Fastec believes that some unknown subset of the deadbolt locks sold between January 2006 and April 2013 with one of the 9 model numbers shown above may potentially be

affected.[1] Among deadbolt locks with these 9 model numbers, the potentially affected deadbolt locks fall into two subsets.

First, based on recently-completed product testing, Fastec believes that every deadbolt lock among the 9 model numbers that has one of the 20 specific product key codes listed above is potentially affected.[2]

Second, although no failures were detected in product testing of any of these same model number deadbolt locks having other key codes, Fastec urges consumers having any deadbolt Fastec lock on their RV to check to ensure that their lock is unaffected. A consumer can determine whether his or her lock is actually affected in two simple steps. First, lock the deadbolt from the outside with the key, which entails turning the key to the left (counterclockwise) one-quarter turn to the 9 o'clock, horizontal position. Second, with the key in the horizontal, 9 o'clock position, attempt to remove the key from the lock. A consumer's lock is unaffected if the key cannot be removed when the key is in the horizontal, 9 o'clock position. A consumer's lock is affected if the key can be removed when the key is in the horizontal, 9 o'clock position.

III. Description of the Issue and Chronology of Events

Fastec does not believe that the locks that are the subject of this Report have a defect that poses a substantial risk of injury to the public. It nonetheless has decided to conduct a recall to address a performance issue that could, under extremely unusual circumstances, potentially pose a safety risk.

Specifically, some of the cylinders in some of the potentially affected locks identified above may not conform to the design specifications. As designed, keys cannot be removed from the deadbolt cylinder (the bottom cylinder) in the locked door when the key is in the horizontal, 9 o'clock position. Instead, the lock is designed so that a key can be removed from the deadbolt

[1] These 9 model numbers (three models in three colors each) are the only deadbolt RV door locks that Fastec sold. Fastec sold other RV door locks that did not have a deadbolt. The locks without a deadbolt are unaffected.

[2] Fastec sold the potentially affected model numbers of deadbolt locks with 51 different key codes. In product testing, samples of 20 key codes experienced an issue with removal of the key in the 9 o'clock position; samples of the remaining 31 key codes did not. Nevertheless, consumers with *any* Fastec deadbolt RV door lock should test their lock to determine whether it is affected.

cylinder only when the key is in the vertical 12 o'clock position or in the horizontal 3 o'clock position. In those positions, removal of the key from the lock permits the door to be opened from inside the RV without a key by operating the red lever on the interior side of the lock to unlock the door. If a lock is affected, however, a key may be removed from the locked door when the key in the deadbolt cylinder is in the horizontal 9 o'clock position, potentially jamming the deadbolt and potentially causing the red lever on the interior side of the lock to become inoperable.

Thus, in the event that: (1) a lock is affected; (2) the deadbolt in the door is locked from the outside with the key; (3) the key is removed from the deadbolt lock cylinder only when the key is in the 9 o'clock position;[3] (4) a person is inside the RV; and (5) nobody outside the RV is available to unlock the deadbolt in the door with a key, a person inside the RV may not be able to unlock and open the main RV door, but he or she could still exit the RV from the emergency exit.

How and When Discovered:

In December 2012, WESCO, Fastec, a RV door manufacturer (Phillips Products), and a RV manufacturer (Forest River, Inc.) settled a lawsuit that was brought by a consumer who alleged that she was injured when she exited her RV travel trailer from the emergency exit. The consumer alleged that she could not open the main RV door that had been locked by her husband with his key from outside the RV. (*Kelley v. Fastec Industrial Corp., et al.*, Case No. 6:11-cv-06256-TC (D. Or.)).

In the course of defending the lawsuit, the lock on the consumer's RV door was examined. It was manufactured in 2006. During 2006, some concern was expressed about the possibility that some locks manufactured by Huafeng might not conform to the design specifications, but Fastec believed those concerns had been fully addressed and finally resolved by Huafeng. It ultimately was discovered, however, that the lock in the *Kelly* lawsuit was affected as described above with the key being able to be removed from the deadbolt cylinder in the 9 o'clock position and the red lever on the interior side of the lock becoming inoperable under those conditions.

[3] If the consumer removes the key from the deadbolt lock cylinder while the key is in the vertical 12 o'clock position or in the horizontal 3 o'clock position, the deadbolt door lock functions properly as designed.

Huafeng and Fastec both investigated the issue further to determine whether any other deadbolt locks – regardless of the date of manufacture, the model number, or the key code – could have been similarly affected.

Specifically, on or about April 20, 2013, Huafeng reported to Fastec that Huafeng believed that some unknown subset of locks bearing eight separate key codes could potentially be affected. Huafeng subsequently reported on June 28, 2013 that further testing of the locksets indicated the possibility of removing the key in the 9 o'clock position in locks with 15 different key codes. Fastec also independently arranged to have an independent laboratory test samples of all the key codes used in all models of deadbolt RV locks in its inventory. It determined that locks with 15 different key codes (most of which were the same as those determined by Huafeng) could potentially be affected. In all, 20 separate key codes as identified above were determined to potentially be affected.

Fastec has no legal department of its own, but sought assistance from the WESCO legal department in connection with this matter. WESCO is primarily in the business of selling wholesale electrical and industrial parts, not consumer products. Accordingly, outside counsel was retained to assess whether Fastec had any reporting obligations under the consumer product safety laws.

Outside counsel advised that Huafeng and WESCO both may have an obligation to report the issue. The same day that WESCO's General Counsel received this advice, a decision was made to submit a report, to conduct a recall, and to invite Huafeng to participate in the recall process. Huafeng declined to participate.

WESCO first filed an initial report with the Consumer Product Safety Commission ("CPSC") on June 12, 2013. The CPSC advised WESCO that the CPSC Office of General Counsel determined that the product falls under the jurisdiction of NHTSA, rather than CPSC.

Type of Hazard:

If a lock is affected, the key may be removed from the deadbolt cylinder (the bottom cylinder) in the locked door when the key is in the horizontal 9 o'clock position, potentially jamming the deadbolt and potentially causing the red lever on the interior side of the lock to become inoperable.

In the event that: (1) a lock is affected; (2) the deadbolt in the door is locked from the outside with the key; (3) the key is removed from the deadbolt lock cylinder only when the key is

in the 9 o'clock position;[4] (4) a person is inside the RV; and (5) nobody outside the RV is available to unlock the deadbolt in the door with a key, a person inside the RV may not be able to unlock and open the main RV door, but he or she could still exit the RV from the emergency exit.

Discussion of Known Injuries:

Fastec has received only one report of a consumer injury. The plaintiff in *Kelley* allegedly fell when she could not exit the RV from the main door and, instead, used the RV's emergency exit. She sustained a herniated cervical disc and a fractured vertebra allegedly as a result of that fall.

There are no other lawsuits, and no other reports of injury of which Fastec is aware.

IV. The Remedy Program and Its Schedule

Fastec and WESCO have or will unilaterally and voluntarily take the following steps:

Huafeng and Fastec identified the failure of some lock key codes to conform to design specifications, and Huafeng advised Fastec that Huafeng has removed non-conforming key codes from its inventory. Additionally, Huafeng has ceased production of cylinders with non-conforming key codes and indicated that the lock cylinders are being modified to improve the cylinder performance and prevent key removal in the 9 o'clock position. All future production for Fastec will be limited to conforming key codes and reworked cylinders that will meet the design specifications.

Fastec additionally tested an initial lock from each of the unaffected 31 key code cylinders and then tested an additional six samples from each of six unaffected key codes. All samples passed this testing with no keys being able to be removed in the 9 o'clock position. To test the samples, the deadbolt was locked by turning the key to the horizontal 9 o'clock position, and, with the key in that position, a minimum of 50 pounds of force was applied in an effort to remove the key from the cylinder. Additionally, as of April 25, 2013, every deadbolt lock that Fastec ships to any customer from its current inventory has been being manually tested by

[4] If the consumer removes the key from the deadbolt lock cylinder while the key is in the vertical 12 o'clock position or the horizontal 3 o'clock position, the deadbolt door lock functions properly as designed.

employees to ensure that the key cannot be removed when the deadbolt is engaged and the key is in the horizontal, 9 o'clock position.

In June 2013, Fastec began advising all of its OEM business customers in the RV industry that locks may be potentially affected and told the customers to return any actually affected lock cylinders to Fastec for replacement cylinders. A representative sample of the notification letter to OEM RV customers is attached as Exhibit 4. Fastec also encouraged its OEM RV industry customers to advise their own business customers of the issue and the need to replace any cylinders that are actually affected.

Upon approval of the proposed recall and the recall announcement, Fastec proposes to notify consumers of the recall. Fastec estimates that it will issue consumer notifications by September 10, 2013. As part of the recall, Fastec further proposes to:

(1) Give consumers instructions on how to identify whether they have a Fastec deadbolt RV door lock with one of the 20 potentially affected key codes, which appear on the keys. Consumers with one of those 20 key codes should immediately participate in the recall.

(2) Give consumers who have any Fastec deadbolt RV door lock with one of the 31 other key codes instructions on how to determine whether they have a lock that is actually affected – can you remove the key from the deadbolt cylinder (the bottom cylinder) of the locked door when the key is in the horizontal 9 o'clock position? Consumers with an affected lock with any key code should immediately participate in the recall.

(3) Pending replacement of the lock cylinder, advise consumers who own a deadbolt RV door lock that is subject to the recall to cease using the key to lock the door with the deadbolt from the outside, or, if they must do so, ensure that the key is removed from the deadbolt cylinder in the locked door only when the key is in the vertical 12 o'clock position, in which case the deadbolt lock functions as designed.

(4) Advise consumers who opt to participate in the recall that Fastec will arrange, with no charge to consumers, to send replacement cylinders to the consumer, along with simple and clear instructions by which the consumer can remove the affected cylinders and insert the replacement cylinders in their place. It literally takes only a couple of minutes to complete this replacement. A replacement cylinder kit, including instructions and new cylinders for both the paddle handle and deadbolt, will be provided free of charge.[5]

[5] Replacing the paddle handle cylinder is not necessary to ensure consumer safety. But, replacing it is necessary if consumers want to have one key that operates both the deadbolt and paddle handle locks.

(5) Advise consumers to send the affected cylinders back to Fastec, at no cost to the consumer.

Fastec will work with the NHTSA to issue press releases; retail posters; a 1-800 number; notices on the Fastec and WESCO websites; direct mailings to those consumers that purchased replacement cylinders from the Fastec website for whom the company has their contact information; and, possibly, notices posted on internet forums directed to and used by RV owners.

EXHIBIT 1 – Sample Pictures of Potentially Affected Lock and Key (with Key Code)







EXHIBIT 2 – The replacement cylinder kit for one of the potentially affected locks that Fastec sells directly to consumers, complete with instructions.

Fastec will provide an exemplar of the replacement cylinder kit and instructions under separate cover.

EXHIBIT 4 – Fastec notification Letter to RV manufacturers that purchased the equipment

Letter begins on subsequent page:

WESCO®
Fastec Industrial
A Division of WESCO Distribution, Inc.

SAFETY RECALL NOTICE

Fastec Industrial Corp., a division of WESCO Distribution, Inc., will announce, under the auspices of the National Highway Traffic Safety Administration ("NHTSA"), a voluntary recall and replacement program for certain Travel Trailer Lock Deadbolt Cylinders manufactured by Zhongshan Huafeng Lock Product Co., Ltd. and sold under the FIC brand name between January 1, 2006 and April 25, 2013 (the "Recall Period").

Our records indicate that Fastec sold potentially affected locks to you during the Recall Period.

I. Deadbolt Cylinders Subject to Recall

The potentially affected locks are all deadbolt locks that were sold during the Recall Period with one of the following WESCO part numbers: 43610-00 (Chrome), 43610-06 (Black), 43610-09 (White), 40610-00 (Chrome), 40610-06 (Black), 40610-09 (White), 44610-03 (Chrome), 44610-06 (Black), 44610-09 (White).

The deadbolt cylinders subject to recall fall into two categories.

First, a deadbolt lock with one of the WESCO part numbers sold during the Recall Period is subject to recall if it has one of the following 20 cylinder key codes: HF-304, HF-307, HF-308,HF-309, HF-311, HF-313, HF-315, HF-316, HF-320, HF-322, HF-323, HF-328, HF-331, HF-335, HF-336, HF-339, HF-342, HF-343, HF-347, and HF-349.

The cylinder key code of the lock is stamped on the metal shaft of the Black Headed FIC user key. (Example HF-347, image 1).

Image 1



The cylinder key code additionally may be found on a white label that is attached to the main body of the lock. (Example: Ref: Code HF-311, image 2). In the case of a mounted lock, remove the four interior mounting screws and remove the interior paddle handle and plate assembly to view the label.

Image 2



Second, the recall includes *any* deadbolt lock with one of the WESCO part numbers, *regardless* of the key code, where the key can be removed from the deadbolt cylinder when the key is in the 9 o'clock position and the deadbolt is engaged. Under normal use and operation, the keys to the lock should only be able to be removed in the 12 o'clock (neutral) and 3 o'clock (unlocked) positions.

II. Free Replacement Cylinders for Recalled Locks in Your Possession

If you have in your possession a FIC deadbolt lock with one of the WESCO part numbers that is subject to recall – either because it has one of the 20 key codes or because the key can be removed from the deadbolt cylinder when the key is in the 9 o'clock position and the deadbolt is engaged – do not sell it. Instead, please contact FIC by calling (800) 837-2505.

You will receive a new set of Lock Cylinders for both the exterior paddle handle as well as the deadbolt. Since the deadbolt cylinder and the paddle handle cylinders are keyed the same, both the paddle and deadbolt replacement cylinders will be provided free of charge.

When you receive the replacement cylinders you will also receive information as to how to remove and replace the cylinders and a prepaid return shipping package so that affected cylinders and keys can be returned to Fastec.

III. Recalled Locks No Longer in Your Possession

If you sold recalled deadbolt locks to other businesses, please provide them with a copy of this letter so that they do not sell them to others without contacting FIC and receiving free replacement cylinders.

If you would prefer, please provide us, instead, with a mailing list of your business customers to whom you sold recalled locks, and we would be happy to contact them ourselves. We would use the mailing list for no other purpose.

IV. Consumers

Please note that we are not yet contacting individual consumers. And, we ask that you not do so at this time. Please note that Fastec will provide appropriate instructions to consumers to enable them to replace the lock cylinders on their own without the involvement of a dealer or the RV manufacturer. Please do not have any dealers undertake any corrective actions or perform any replacement work on any locks in the possession of consumers at this time.

If you have a mailing list of end-consumers that have a potentially affected lock in their possession, please let us know. With your permission, we would be happy to notify end consumers that you can identify by direct mail once the recall is announced with the NHTSA.

Fastec expects to notify consumers about the recall by September 6, 2013, pending approval by the NHTSA.

V. Reason for the Recall

Under normal use and operation, the keys to the lock should only be able to be removed from the cylinder in the 12 o'clock (neutral) and 3 o'clock (unlocked) positions.

If, contrary to the locks' design, the key can be and is removed from the lock when it is in the 9 o'clock position and the deadbolt is engaged, then the deadbolt may jam and prevent occupants inside the travel trailer from being able to operate the red deadbolt lever to unlock the door from the inside and exit the trailer through that door.

Fastec encourages you to contact us to obtain replacement cylinders for recalled locks immediately. Pending replacement of any locks that already are installed, do not lock the deadbolt using the key from the outside. Or, if you do so, ensure that the key is returned to the 12 o'clock (neutral) position after engaging the deadbolt, in which case the lock should operate properly.

Please be reminded that it is a violation of Federal law for you to sell the deadbolt locks covered by this notification until you receive the replacement cylinders.

Please contact Fastec if you have any questions or to obtain replacement cylinders for recalled deadbolt locks in your possession. We appreciate your cooperation and understanding.

Sincerely,

Fastec Industrial Corp.