

Safety Defect and Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Report

On January 4, 2013 The Braun Corporation decided that a defect which relates to motor vehicle safety exists in the 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: **January 9, 2013**

Furnish the manufacturer's identification code for this recall: **N/A**

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164:

The Braun Corporation

Identify the corporate official, by name and title, who the agency should contact with respect to this recall:

Rick Nelson
Director of Product Support

Telephone Number: **1-800-946-7513 Extension 3272**
Fax Number: **574-946-3143**

Name and Title of Person who prepared this report:

Barry Wolff
Director of Risk Management

Signed:

Barry E. Wolff

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: **Toe pan panel**

Dates of manufacture: **May 8, 2012 to January 3, 2013**

Make: **Braun** Model: **Rampvan**

Part Number(s): **E91158 & EC90170** Size: **N/A**

Function: **Cosmetic covering of the steel toe pan adjacent to the accelerator pedal.**

Other information which characterizes/distinguishes the items of equipment to be recalled: **N/A.**

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: **100 percent.**

II. Identify the Recall Population

3. Furnish the total number vehicles recalled potentially containing the defect or noncompliance.

<u>Model</u>	<u>Year</u>	<u>Number of Items Potentially Involved</u>
Braun Rampvan	2011-2013	732 vehicles

Total Number Potentially Affected by the Recall: **732 vehicles**

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: **<1%**

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:

On January 3, 2013 Braun was notified of an in-field instance of a toe pan panel that was interfering with the operation of the OEM accelerator pedal. Braun immediately halted Rampvan shipments and initiated an in-house investigation. Braun was unable to find a similar instance of interference on any of the vehicles it had on its premises. Nonetheless, Braun decided that a potential defect may exist in its Rampvan conversions produced since May 8, 2012. The recall population was determined as those vehicles fitted with a new toe pan panel design that was introduced in production on May 8, 2012. Braun remedied its inventory of vehicles on January 4th and 7th, and implemented a modified toe pan panel in production on January 4, 2013.

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 defect occurs when the toe pan panel comes in close proximity to the rear surface of the accelerator pedal lever. There is an OEM protrusion on this surface that may contact/engage the toe pan panel.

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

Vehicle manufacturing tolerances may combine to produce the interference with the toe pan panel and the rear of the accelerator pedal lever.

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

If the accelerator pedal engages with the toe pan panel, the pedal may not return to its zero throttle position and thereby produce unintended acceleration.

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

None

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

N/A

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

N/A

IV. 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.

On January 3, 2013 Braun was notified of an in-field instance of a toe pan panel that was interfering with the operation of the OEM accelerator pedal. Braun immediately halted Rampvan shipments and initiated an in-house investigation. Braun was unable to find a similar instance of interference on any of the vehicles it had on its premises. Nonetheless, Braun decided that a potential defect may exist in its Rampvan conversions produced since May 8, 2012. There has been only a single report of possible defect. This was covered by warranty. There have been no accidents, injuries, or fatalities.

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.

N/A

V. Identify the Remedy

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

See attached Safety Recall Notice Service Bulletin 38129.

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

See attached Safety Recall Notice Service Bulletin 38129

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 recall condition was corrected in production on January 3, 2013. This took the form of trimming the toe pan panel as shown in Service Bulletin 38129. The production remedy is identical to the recall remedy.

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.

The Braun Corporation anticipates the recall campaign will begin on January 10, 2013 with notice to Braun's mobility dealer network of the potential defect, affected VIN's and forthcoming remedy. During the week of January 14th selling dealers will be notified of their responsibilities in coordinating the campaign. Also, end users will begin to be notified regarding the recall. We do not anticipate any problems implementing the recall.

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) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

See the attached proposed recall communications.