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VIA EMAIL AND FEDERAL EXPRESS

Ms. Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigations
NHTSA
1200 New Jersey Avenue, SE
Washington, DC 20590
Email: rmd.odi@dot.gov

Re: Notification of Potential Safety Defect

Dear Ms. Timian:

We hereby submit the following information in accordance with 49 C.F.R. § 573.6:

(1) The manufacturer's name: Gates Winhere Automotive Pump Products (Yantai) Co., Ltd. (“Gates Winhere”).

(2) Identification of equipment potentially containing the defect or noncompliance: The equipment at issue is an aftermarket Tru-Flow Water Pump, part number TFW 41127 with only fifty (50) affected units sold to NAPA Auto Parts Distribution (“NAPA”). Gates Winhere identified quality issues with sprockets used in TFW 41127. NAPA was notified but none of the fifty (50) units have been returned yet. The defect only involves those water pumps that either have a silver colored pulley/sprocket or do not have “US9377” stamped on the water pump housing.

(3) Description of component part: The units were manufactured from August 2013 to October 2013 and sold under the brand name “Tru-Flow” using part number TFW 41127.

(4) Different manufacturer (from reporting manufacturer) of component that contains the defect or noncompliance: The component was made by Shanxi NBTM Huasheng Powder Metallurgy Co., Ltd. in China at the following address: No. 168 Huajin Road, Linyi County, Shanxi Province, China.

(5) Identification of business receiving the defective or noncomplying component: The sprockets at issue were manufactured and included only in the parts sold to NAPA and identified in item 2, above.

(6) The total number of vehicles or items of equipment potentially containing the defect or noncompliance, and where available the number of vehicles or items of equipment in each group: The total number of units that have not been recovered is fifty (50). It is not currently known how many, if any of these, have been installed on vehicles.

(7) The percentage of vehicles or items of equipment estimated to actually contain the defect or noncompliance: The company believes that all of the units identified in item 2 contain the defect.

(8) Description of the defect or noncompliance and the risk to motor vehicle safety reasonably related to the defect or noncompliance: Due to nonconforming metal quality, the pulley or sprocket which turns the timing belt may develop microfractures which may lead to failure of the timing belt and abrupt engine cessation. The attached illustration shows the location of the sprocket within the unit. Abrupt engine cessation could cause a safety risk depending upon the conditions of vehicle operation at the moment of engine cessation.

(9) In the case of a defect, a chronology of all principal events that were the basis for the determination that the defect related to motor vehicle safety, including a summary of all warranty claims, field or service reports, and other information, with their dates of receipt: There have been no customer complaints, field or service reports associated with this defect. In November 2013, an operator at the Gates Winhere facility found a quality issue with the sprockets used to build the water pump. That quality issue was reported to the Technical Product Specialist; Quality Engineer, Water Pump Division; Technical Director, Water Pumps; and Product Manager. An analysis of the details regarding the defect in relation to the intended use of the water pumps confirmed the quality issue. At that time, Gates believed that the affected parts remained in Gates' inventory and had not been shipped to any external party. By late November, Gates determined that fifty (50) affected units had just been shipped to NAPA. NAPA was quickly alerted and asked to return all inventory of the part, which they had just received. At the time, Gates believed that the affected units would be collected from NAPA without any being sold to ultimate consumers. Gates has now determined that NAPA is not able to easily locate the fifty (50) affected units, and Gates is now concerned that some of those units may have been sold to jobbers or consumers. Once Gates learned that the affected units had not been captured from NAPA inventory, Gates' product and quality engineering teams made a determination that an abrupt cessation of the engine caused by a timing belt failure could cause a safety issue depending on the nature of vehicle operation at the moment of the timing belt failure.

(10) Test results and other information that the manufacturer considered in determining the existence of the noncompliance: Gates recently learned that all of the affected units were not captured from NAPA inventory. Once Gates realized that affected units were not captured from NAPA's inventory, Gates' product and quality engineers made an engineering judgment that the defect at issue could be safety-related and that NHTSA should be alerted. There are no written documents reflecting this engineering determination.

(11) A description of the manufacturer's program for remedying the defect or noncompliance: Gates plans to obtain customer addresses from NAPA, to the greatest extent

possible, and to then contact those customers via owner notification letters that vehicles can be brought to specified dealers for replacement of the water pump at no charge to the owner. Gates is currently gathering the information and specifics necessary to propose a more specific recall program to NHTSA, and Gates will supplement this information within the 60-day period provided by NHTSA rules.

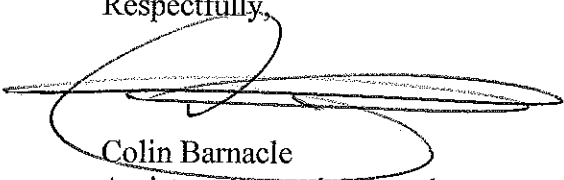
(12) Estimated date(s) of notifications: Gates plans to begin notification on or before May 5, 2014.

(13) A representative copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance: The attached notice was prepared by Gates' Technical Product Specialist and Product Manager to ease review of Gates' inventory to identify defective units. This document was then shared with NAPA to allow NAPA employees to identify and collect affected units in NAPA's inventory.

(14) The manufacturer's campaign number, if not identical to the identification number assigned by NHTSA: Gates awaits assignment of a campaign number by NHTSA.

Please contact the undersigned with any questions about this notification.

Respectfully,



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Attachment