



POWERING PROGRESS™

April 14, 2014

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: NHTSA Campaign Number 14E-007

Dear Ms. Timian:

I am writing to follow up on my letter of March 6, 2014, and your confirmation letter of April 2, 2014. Since the company submitted its March 6 letter, pertinent information from that letter was entered into the safercar.gov database. Since that time, we have become aware that two minor corrections to the information we submitted, and that is now reflected in the safercar.gov database, should be made in order to better assist us in locating vehicle owners who may be affected by this recall, which we now think affects only 48 units, most of which are likely still in retail inventory.

First, in paragraph (2) of our March 6, 2014, letter, we erroneously stated that the pulley/sprocket on the affected water pumps would be silver in color. In fact, the affected parts have a pulley/sprocket that is black. Second, while we did indicate, in paragraph (3), the manufacture date of the parts, we did not state when and where the parts were available for sale. The affected parts were only sold at NAPA Auto Parts stores and in stock at NAPA not earlier than November 1, 2013. Given that, we think it would be helpful for the safercar.gov database to indicate that installation of the affected parts would have to have occurred after November 1, 2013.

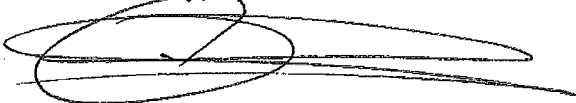
With these specific corrections in mind, we recommend revision of the "Problem Description" paragraph in your April 2, 2014 letter, and in the safercar.gov database as follows:

The Gates Corporation (Gates) is recalling certain aftermarket Tru-Flow Water Pumps, part number TFW 41127, sold at certain NAPA Auto Parts stores and/or installed by automotive service technicians after November 1, 2013 (and manufactured August 2013 through October 2013) that have a black-colored pulley/sprocket or do not have 'US9377' stamped on the water pump housing. These service replacement parts were sold for use in model year 1999-2005 Audi A4, 2000-2006 Audi TT, 1998-2005 Volkswagen Beetle, 1999-2006 Golf, 1999-2008 and 2011-2013 Volkswagen Jetta, and 2000-2005 Volkswagen Passat. In the affected water pumps, the pulley or sprocket that turns the timing belt may develop microfractures causing the timing belt to fail.

We are also concerned about NHTSA's statement, under "Consequence", that "A failure of the timing belt may cause the engine to shut down increasing the risk of a vehicle crash." The statement seems to overstate the possible risk. Our March 6 letter had stated that, if microfractures develop in the timing belt, "Abrupt engine cessation could cause a safety risk depending upon the conditions of vehicle operation at the moment of engine cessation." In fact, Gates does not know of a single timing belt that has actually failed, though our concerns about nonconforming metal specifications and the high quality the public generally expects from Gates products caused us to initiate this voluntary recall. Mindful of the requirements of 49 CFR 577.5(f), we nonetheless think "Consequence" could instead state: "A failure of the timing belt may cause the engine to shut down, potentially increasing the risk of a vehicle crash."

We would appreciate your attention to these requested clarifications of the description of this recall in the safercar.gov database description. We look forward to your reply to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Colin Barnacle", with a large, loopy flourish extending to the right.

Colin Barnacle

Cc: Ms. Kelly Schuler