

# UCI-FRAM Group

April 30, 2014

**Via Email:** [RMD.ODI@dot.gov](mailto:RMD.ODI@dot.gov)

Ms. Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

The following information is submitted in accordance with the National Highway Traffic Safety Administration's defect reporting regulations set forth in 49 C.F.R part 573.6.

This report relates to approximately 14,529 replacement ignition switches for certain General Motors LLC ("GM") vehicles that were marketed and sold by Wells Manufacturing, LP (the "Company") as replacement products from 2005 to April, 2014. The Company has received no reports that any of these products failed in a manner that would impact motor vehicle safety. As explained below, however, out of an abundance of caution the Company is notifying NHTSA of a potential defect that may exist in these products.

## 1. Identification of the Equipment and Manufacturer, §§ 573.6(c)(1), (c)(2)

The Company sold the ignition switches under the Wells, Duralast, Carquest and Airtex brands. The switches were designated as model numbers LS1328<sup>1</sup> and LS1497<sup>2</sup> (collectively, "the products"). The Company sold the products as replacement parts for various GM vehicles sold in the United States and Canada as set forth in the following two tables.

Make	Model	Model Year(s)
Chevrolet	Cobalt	2005-2007
Chevrolet	HHR	2006-2007
Pontiac	G5	2007-2008
Pontiac	Pursuit	2005-2006
Pontiac	Solstice	2006-2008

<sup>1</sup> LS1328 Family Ignition Switches are sold as WELLS LS1328, DURALAST LS1328, AIRTEX 1S6097 and CARQUEST 53-27479. The LS1328 Family Ignition Switches are hereinafter collectively referred to as model LS1328.

<sup>2</sup> LS1497 Family Ignition Switches are sold as WELLS LS1497, DURALAST LS1497, AIRTEX 1S10961 and CARQUEST 53-27967. The LS1497 Family Ignition Switches are hereinafter collectively referred to as model LS1497.

Saturn	ION	2003-2007
Saturn	Sky	2007

<b>Table 2: Applications for Part No. LS1497 Family Ignition Switches</b>		
<b>Make</b>	<b>Model</b>	<b>Model Year(s)</b>
Chevrolet	Cobalt	2008-2010
Chevrolet	HHR	2008-2011
Pontiac	G5	2009-2010
Pontiac	Solstice	2009
Saturn	Sky	2008-2010

The make, model and model years for the products are identical to the make, model and model years of vehicles now being recalled by GM because of a potential defect in the ignition switch. The products were not sold as replacements for, and to the Company's knowledge, not installed in vehicles other than those identified in Tables 1 and 2.

**2. Number of Items of Equipment Containing the Defect, § 573.6(c)(3)**

The Company purchased the products from six different suppliers. The Company repackaged the products and sold them under the above brand names and designated model numbers to its customers, which include large chain store automotive parts retailers and distributors that, in turn, resell to local retailers, mechanics (i.e., installers) and consumers.

A review of historical records and retained product samples shows that five of the Company's suppliers sold an ignition switch manufactured by Delphi Packard Electrical ("Delphi"). In late 2011, the Company began purchasing the product from CUB Electparts, Inc. ("CUB"). This product was designed and manufactured by CUB and sold to the Company and other parts suppliers.

The names and locations of each of the Company's suppliers, estimated numbers of products purchased from each supplier, and the approximate dates of those purchases is summarized in the following table:

<b>Table 3: Supplier Information</b>			
<b>Supplier / location</b>	<b>Manufacturer</b>	<b>No. Purchased</b>	<b>Dates Purchased</b>
Saturn of Fond du Lac  (no longer in business)	Delphi	24	2005 to 2007
Cofinch Trading Co. Inc. 161 Woodbine Street, No. 2 Bergenfield, NJ 07621.	Delphi	2,065	2008 to 2010
Pro Unique Industrial, Inc. 17-8, 37th Road Taichung Industrial Park Taichung, 40768 Taiwan	Delphi	2,068	2011 to Present
Precision Service & Parts Inc. 3655 N. 126 <sup>th</sup> St. Unit A DR Brookfield, WI 53005	Delphi	180	2010 to Present
CUB Electparts, Inc. No. 6, Lane 546, Sec. 6 Changlu Road Fushin Township Changhua County 50648, Taiwan (R.O.C.)	CUB	10,192	2011 to Present
<b>TOTAL</b>		14,529	

As depicted in Table 3, between 2005 through April, 2014, the Company has purchased and sold approximately 4,337 of the Delphi manufactured products, and approximately 10,192 of the CUB manufactured products. The Company has stopped the purchase and shipments of these products, notified its customers to quarantine any products that they might have in inventory, and requested customers to return the products to the Company. Based on the Company's current understanding of its customer's inventory levels, the Company estimates that of the total 14,529 models LS1328 and LS1497 ignition switches that it has sold, approximately 13,029 are in the field and installed in vehicles.

### **3. Description of the Defect and Affected Population, §§ 573.6(c)(4), (5)**

The Company's understanding of the potential defect in the product is based upon its review of the GM notifications, documents and disclosures in connection with

its recall, as well as the documents publicly disclosed in connection with the Congressional investigation of GM. In addition, the Company has performed a preliminary engineering investigation of the Delphi and CUB products.

Based on this information, the Company understands that GM has identified a defect in the ignition switch that was manufactured by Delphi, and that GM is recalling approximately 2.6 million motor vehicles that may be equipped with this switch as original equipment or may have had the Delphi switch installed as a replacement part. The Company understands that the Delphi switch has been determined to be defective because it may not meet GM's torque specification.

The Company understands that the applicable torque specification requires a force of 20 newton/cm (plus or minus 5 newton/cm) to move from the "run" position to "accessory".<sup>3</sup> According to GM, a switch that does not meet this specification may, under the circumstances disclosed by GM in its notifications to NHTSA, unintentionally move from the run position to accessory while the vehicle is underway<sup>4</sup>. In the accessory position, GM states that the vehicle's airbags may fail to deploy in a crash.

The Company believes that it has purchased and resold the same Delphi switches that are the subject of GM's recall. Based on its review of documents made available following GM's recall, the Company understands that Delphi made a design change in 2006 and there are two generations of Delphi switches. The switches that the Company purchased from CUB beginning in late 2011 until April 2014 were designed by CUB to match the performance of Delphi's second generation ignition switch that was sold after 2006.

The Company's own preliminary engineering investigation and testing shows that the CUB product contains a more robust detent plunger than the first generation Delphi product. Its preliminary testing indicates that the CUB product requires 60% more torque to operate than the first generation Delphi product.

In April 2014, the Company's outside consultant tested the CUB product against the specific GM torque specification. The results from a test of twenty CUB products showed that nine did not meet the GM torque specification for peak torque when switched from run to accessory.

The Company has never received a claim or notice that any Delphi or CUB-product was involved in any events where the switch has inadvertently moved from the run to the accessory or off positions. The Company has searched its claims data, including call center reports, and identified only one warranty claim from November 2012 involving a Delphi version of the model LS1328 product. The owner claimed that the product failed to switch the vehicle on immediately following installation. To the

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<sup>3</sup> The Company became aware of this GM torque specification upon reviewing the public documents disclosed by NHTSA and Congressional Subcommittee.

<sup>4</sup> GM states that the defect may occur if the key ring is carrying excessive weight or if the vehicle goes off the road or experiences some other jarring event.

Company's knowledge, the product that was the subject of this warranty claim was never used in operation. The Company tested the returned product giving rise to the warranty claim and found no electrical defects.

Although the Company has not been able to independently determine, based on its claims experience, investigation or testing, that its products present any safety risk, out of an abundance of caution, the Company is submitting this notification to NHTSA.

**4. Chronology of Events, § 573.6(c)(6)**

<b>Table 4: History of the products and events leading to this notification.</b>	
<b>2005 to November 2011:</b>	<ul style="list-style-type: none"><li>• The Company begins sales of its model LS1328. In 2010, it begins sales of its model LS1497 products. These products are initially manufactured by Delphi and purchased from various distributors.</li><li>• The Company does not receive any report of a failure of the product, or any claim or report where the ignition switch inadvertently moved from the run to off or accessory position in this time-period.</li></ul>
<b>November 2011 to January 2014</b>	<ul style="list-style-type: none"><li>• The Company also begins to purchase its LS1328 product from CUB. The company continues to purchase the LS1497 from Delphi distributors.</li><li>• The Company receives one warranty claim (of a no-start condition) relating to a Delphi manufactured product. That product is tested and no electrical defects were found.</li><li>• The Company does not receive any reports that the Delphi or CUB-supplied products inadvertently moved from the run to off or accessory position.</li></ul>
<b>February 2014 to March 2014</b>	<ul style="list-style-type: none"><li>• The Company learns that GM is recalling various vehicles equipped with the Delphi-product and begins an investigation.</li><li>• The Company gathers information about the scope of the GM recall and the specifications of</li></ul>

	<p>the Delphi product.</p> <ul style="list-style-type: none"><li>• The Company performs and completes preliminary comparative testing between the Cub-supplied product and the Delphi product and concludes that the Cub-supplied product's torque performance is 60% greater than the first generation Delphi switch. No second generation Delphi switches were available for testing.</li></ul>
<b>April 2014</b>	<ul style="list-style-type: none"><li>• The Company confirms that there are no failures involving inadvertent switching from run to accessory or run to off of any of the products sold by the Company.</li><li>• The Company retains an outside engineering firm to assist in its ongoing investigation.</li><li>• The Company notifies its customers to quarantine and return the products.</li><li>• The Company confirms the GM torque specification from the Congressional record and the publicly disclosed documents by GM and determines that the CUB products may not meet the GM torque specification.</li></ul>

##### **5. Remedy Program, § 573.6(c)(8)**

The Company has reviewed the publicly available documents relating to the GM recall. Based on that review, the GM recall covers all of the makes, models, and model years for which the Company's Model LS1328 and LS1497 ignition switches were specified and sold. There are no known applications for the products other than the application set forth in Tables 1 and 2. Thus, the Company understands that the GM recall applies to all the products that were sold by the Company.

GM's recall program requires GM to replace the switches in all affected vehicles, regardless whether the owner may have previously replaced the ignition switch. Because the Company understands that owners of any vehicles that may be equipped with a Model LS1328 or LS1497 switch will receive notification from GM, and will be advised to have all original equipment and replacement ignition switches replaced, the Company believes that the ongoing GM Recall program will effectively recall from the installed base the Company's Model LS1328 or LS1497 ignition switches.

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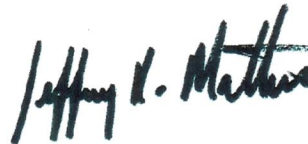
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Although the Company will make such notifications as NHTSA might recommend, there are practical limitations on the Company's ability to conduct a recall campaign. The Company does not have records identifying the vehicle owners whose vehicles have been repaired with one of the products, so a general public notice would be required. Moreover, even if a general public notice were attempted, the Company does not have an alternative source of replacement switches to provide a safe and effective remedy, if such a remedy is required. In addition, the Company believes that any notification program that it could issue advising owners to replace installed Model LS1328 and LS1497 ignition switches may interfere with the GM recall program and potentially decrease its effectiveness.

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The Company stands ready to meet with the Administration to provide any addition information that is needed to assist in its evaluation and to discuss whether public notice and remedial action is warranted under the circumstances outlined in this notification.

Very truly yours,

A handwritten signature in black ink that reads "Jeffrey R. Mathis". The signature is written in a cursive style and is positioned above a horizontal line.

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