



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

June 26, 2020

Mr. Michael Lindstrom
Sr. VP & CTO
ECCO Holdings Corp.
833 West Diamond
Boise, ID 83705

NEF-150KL
20E-041

Subject: Rear LED Lights Too Bright/FMVSS 108

Dear Mr. Lindstrom:

This letter serves to acknowledge ECCO Holdings Corp.'s notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

CODE 3/CODE 3/9999

Mfr's Report Date: June 22, 2020

NHTSA Campaign Number: 20E-041

Components:

EXTERIOR LIGHTING

Potential Number of Units Affected: 761

Problem Description:

ECCO Holdings Corp. (ECCO) is recalling certain Code 3 7x9 Stop-Tail-Turn Reverse All-in-One LED stop, tail, turn, and reverse lights sold primarily for use in emergency vehicles. The lights may be too bright, exceeding the maximum light output allowed which may adversely affect the vision of drivers. As such, these lamps fail to comply with the requirements of the Federal Motor Vehicle Safety Standard (FMVSS) number 108, "Lamps, Reflective Devices, and Associated Equipment."

Consequence:

The excessive brightness may affect the vision of other drivers, increasing the risk of a crash.

Remedy:

ECCO will notify the emergency vehicle manufacturers that used the lights as original equipment and the customers that purchased the lights as replacement equipment. The manufacturer has not yet finalized a recall remedy. The recall is expected to begin July 20, 2020. Owners may contact ECCO at 1-208-395-8023.

Notes:

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

Please ensure the following requirements are met:

A statement that the defect or noncompliance can cause a vehicle crash without prior warning; or a description of whatever prior warning may occur, and a statement that if this warning is not heeded, a vehicle crash can occur (49 CFR 577.5 (f)(1)).

AMENDED 573 REQUIRED.

In the case of items of motor vehicle equipment, the manufacturer of the equipment shall identify by name, business address, and business telephone number every manufacturer that purchases the defective or noncomplying component for use or installation in new motor vehicles or new items of motor vehicle equipment (49 CFR 573.6 (c)(2)(v)).

AMENDED 573 REQUIRED.

Under 49 U.S.C. § 30112 (a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

Please be reminded of the following requirements:

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter (s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573. 7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Kristin Lepper who may be reached by phone at 202-366-5227, or by email at kristin.lepper@dot.gov. We look forward to working with you.

Sincerely,



Joshua Neff
Chief, Recall Management Division
Office of Defects Investigations
Enforcement