OMB Control No.: 2127-0004

Part 573 Safety Recall Report

20E-041

Manufacturer Name: ECCO Holdings Corp.

NHTSA Recall No.: 20E-041

Manufacturer Recall No.: NR



Manufacturer Information:

Manufacturer Name: ECCO Holdings Corp.

Address: 833 West Diamond

Boise ID 83705

Company phone: 2083958023

Population:

Number of potentially involved : 761 Estimated percentage with defect : 100 %

Equipment Information:

Brand / Trade 1: Code 3

Model: 7x9 Stop-Tail-Turn-Reverse All-in-One LED Lamp

Part No.: 79STTRBZ

Size: NR Function: Lamp

Descriptive Information: This recall involves 7 x 9 combination LED stop, tail, turn, reverse lamps sold as

original and replacement equipment for use primarily in emergency vehicles. The recall population was determined by reviewing production and shipping records for the subject lamp. All lamps with this part number will be included in

the scope.

Production Dates: NOV 03, 2014 - MAR 27, 2020

Description of Noncompliance:

Description of the Noncompliance: The subject lamps exceed the maximum permissible candela levels specified in Noncompliance: Federal Motor Vehicle Safety Standard (FMVSS) No. 108 at certain test points.

FMVSS 1: 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2: NR

Description of the Safety Risk: The increased photometric intensity does not comply with the requirements

of FMVSS 108 and may adversely affect the vision of following drivers. \\

Description of the Cause: The lamps do not meet the requirements of the relevant standard.

Identification of Any Warning NR

that can Occur:

Involved Components:

Component Name: NR Component Description: NR

Component Part Number: NR

Supplier Identification:

Component Manufacturer

Name: N/A Address: NR

NR

Country: NR

Chronology:

March 30 and 31, 2020 - Photometry testing was conducted in connection with a change in suppliers for the PCB assembly used in the subject lamps. This testing showed elevated intensity levels in one of the tested lamps.

May – June, 2020 – The company conducted an investigation into the production and design history of the lamp, obtained additional samples for testing, and, on June 14 and 15, 2020, conducted additional photometry tests on sample lamps.

June 15, 2020 – Based upon the testing and other information developed during the investigation, company management decided that a noncompliance with FMVSS 108 exists within the subject population.

There have been no known complaints, accidents or injuries related to this noncompliance.

Description of Remedy:

Description of Remedy Program: We will work with customers to identify and notify affected owners. The

remedy is currently under development. This report will be amended

when the remedy has been determined.

How Remedy Component Differs The remedy is currently under development. This report will be amended from Recalled Component: when the remedy has been determined. All of the subject lamps would be covered under the manufacturer's warranty/goodwill program. Therefore, pursuant to 49 CFR 577.11(e), we request an exemption from the

reimbursement plan requirements.

Identify How/When Recall Condition Shipments of the subject lamps were discontinued on March 27, 2020 as was Corrected in Production: part of a planned supplier changeover. Shipments will resume after the product is redesigned and photometry testing confirms compliance.

Recall Schedule:

Description of Recall Schedule: We will notify direct customers (OEMs and distributors) in accordance

with the "Planned Dealer Notification" schedule shown herein. The Planned Owner Notification schedule provided herein is an estimate; actual timing is dependent upon our OEM and reseller customers.

Planned Dealer Notification Date: JUL 20, 2020 - JUL 24, 2020 Planned Owner Notification Date: AUG 03, 2020 - AUG 07, 2020

Purchaser Information:

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name: NR

Address: NR

NR

Country: NR

Company Phone: NR

^{*} NR - Not Reported