

# Safety Defect and Noncompliance Report Guide for Equipment

## PART 573 Defect and Noncompliance Report

Date: 07/ 28/ 2023

This report serves as SmartPlug Systems, LLC's, notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a SmartPlug Systems 30A Shore Power Inlet Connector has a potential, defective, internal part. The 30A Inlet connector is designed to be mounted on a Recreational Vehicle and is the connector that connects the RV to a power pedestal. This suspect part has only been used in the connector since June 1<sup>st</sup>, 2023. The issue was quickly contained, and only found its way into a few RV's. To make sure this component does not create a failure in the future SmartPlug has decided to recall all of the products that use this component.

### I. Manufacturer, Designated Agent, and Other Chain of Distribution Information

#### **Manufacturer's Corporate Name:**

SmartPlug Systems, LLC  
2500 Westlake Ave North, Suite G  
Seattle, WA 98109

#### **Trademark Name**

SmartPlug Systems, LLC

#### **Chain of Distribution**

SmartPlug Systems, LLC, is a USA Manufacturing Company that provide products to Original Equipment Manufacture and the Aftermarket Channels that support the OEM Business. The Primary markets for the product being recalled in the RV & Marine Business. Product will be recalled from all of our customers in both the OEM and the Aftermarket channels.

#### **This Part is installed in a Recreational Vehicles by the RV OEM**

RV Manufactures who have received product with a Manganese-Bronze D-Ring.

#### 1.) Airstream Trailers

1001 West Pike Street  
Jackson Center, OH 45334  
Phone Number: (937) 596-6111 Ext 7591  
Contact: Tracy Frazier  
Email: [Tfrazier@Airstream.com](mailto:Tfrazier@Airstream.com)

- 2.) ARI-Legacy Sleepers  
860 North Tuscany Drive  
Shipshewana, IN 46565  
Phone Number: (260) 768-4704  
Contact: Dee Bellows  
Email: [Dbellows@legacysleepers.com](mailto:Dbellows@legacysleepers.com)
  
- 3.) Chinook RV  
1482 N. Eel River Cemetery Road  
Peru, IN 46970  
Phone Number: (574) 584-3756  
Contact: Jeff Butler  
Email: [JButler@chinookrv.com](mailto:JButler@chinookrv.com)
  
- 4.) Coach House, Inc.  
3480 Technology Drive  
Nokomis, FL 34275  
Phone Number: (941) 485-0984  
Contact: Mike O'Neil  
Email: [Purchasing@coachhousesrv.com](mailto:Purchasing@coachhousesrv.com)
  
- 5.) David Carter & Associates  
2432 Century Drive  
Goshen, IN 46528  
Phone Number: (574) 642-0627  
Contact: Mike Mohr  
Email: [mmohr@davecarter.com](mailto:mmohr@davecarter.com)
  
- 6.) EarthRoamer LLC  
5073 Silver Peak Ave, Unit 3  
Dacono, CO 80514  
Phone Number: (303) 833-7330  
Contact: Lisa Dreiling  
Email: [Purchasing@earthroamer.com](mailto:Purchasing@earthroamer.com)
  
- 7.) Embassy Specialty Vehicles, LLC  
2104 Aeroplex Drive North, Suite 101  
Elkhart, IN 46514  
Phone Number (574) 333 – 3733  
Contact: Scott Arnold  
Email: [scotta@embassyrv.com](mailto:scotta@embassyrv.com)

8.) Grit Overland  
 3612 P. Street  
 Washougal, WA. 98661  
 Phone Number (360) 910-4882  
 Contact: Dan Dayley  
 Email: [Dan@gritoverland.com](mailto:Dan@gritoverland.com)

9.) Just Roaming LLC  
 33505 SE 6<sup>th</sup> Street  
 Washougal, WA.98671  
 Phone Number: (315) 694-2907  
 Contact: Sam Reiser  
 Email: [Sam@justroamingdesign.com](mailto:Sam@justroamingdesign.com)

10.) Waldoch Luxury  
 13821 Lake Drive NE  
 Forest Lake, MN 55025  
 Phone Number: (651) 287-9639  
 Contact: Billy Waldoch  
 Email: [Wwaldoch@waldoch.com](mailto:Wwaldoch@waldoch.com)

OrderDate	CustomerName	Customer Type	OrderStatus	CompletedDate	CustomerRe	ProductCode	Quantity
6/13/2023	ARI - Legacy Sleepers	RV OEM	Completed	6/19/2023 10:34	PO: 84751	105010601041	24
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:42	PO: 0020931	105010401041	62
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:42	PO: 0020931	105010301041	24
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:41	PO: BCM092	105010301041	160
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:42	PO: 0020931	105010601041	6
6/8/2023	Airstream, Inc	RV OEM	Completed	7/12/2023	PO:1009354	105010302041	120
6/15/2023	Airstream Trailer Plant	RV OEM	Completed	6/28/2023 14:16	PO: 0100931	105010302041	120
6/16/2023	Airstream Trailer Plant	RV OEM	Completed	6/19/2023 10:33	PO: 0100926	105010301041	120
6/27/2023	Airstream Trailer Plant	RV OEM	Completed	6/28/2023 13:34	PO: TCM093	105010601041	50
6/19/2023	Chinook	RV OEM	Completed	6/20/2023 8:23	PO: 2361	105010401041	12
6/28/2023	Chinook	RV OEM	Completed	6/28/2023 13:34	PO: 2432	105010401041	12
6/19/2023	COACH HOUSE, INC.	RV OEM	Completed	6/20/2023 8:23	PO: 2231737	105010301041	12
6/15/2023	Dave Carter & Associates	RV OEM	Completed	6/19/2023 10:33	PO: 247681	105010401041	38
6/19/2023	Dave Carter & Associates	RV OEM	Completed	6/20/2023 8:23	PO: 248126	105010401041	27
6/20/2023	Dave Carter & Associates	RV OEM	Completed	6/20/2023 13:01	PO: 248604	105010401041	20
6/9/2023	Dave Carter & Associates	RV OEM	Completed	7/17/2023	PO:249216	105010401041	40
6/27/2023	Dave Carter & Associates	RV OEM	Completed	7/18/2023	PO:249839	105010401041	4
6/19/2023	EarthRoamer LLC	RV OEM	Completed	6/20/2023 8:23	PO: 0047146	105010401041	5
5/30/2023	Embassy RV	RV OEM	Completed	5/31/2023 8:22	PO: 9454	105010601041	4
5/30/2023	Embassy RV	RV OEM	Completed	5/31/2023 8:22	PO: 9225	105010601041	10
6/26/2023	Embassy RV	RV OEM	Completed	6/27/2023 7:28	PO: 9678	105010601041	10
6/26/2023	Embassy RV	RV OEM	Completed	6/27/2023 7:28	PO: 9623	105010601041	3
6/20/2023	Grit Overland	RV OEM	Completed	6/21/2023 7:43	PO: 00074	105010601041	15
5/30/2023	Just Roaming LLC	RV OEM	Completed	5/31/2023 8:22	PO: 1465	105030201041	15
5/30/2023	Waldoch Luxury	RV OEM	Completed	5/31/2023 8:22	PO: 64753	105010501041	12
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## RV AFTERMARKET ACCOUNTS

### Best RV and Truck Supply

818 N. Ouida Street  
Enterprise, AL 36330

Phone Number: (334) 406-0653

Contact: Randy Kleven

Email: [Randy@bestconverter.com](mailto:Randy@bestconverter.com)

### Etrailer

1507 E Highway A  
Wentzville, MI 63385

Phone Number: (636) 887-9343

Contact: Tamara Wiechens

Email: [Tamara.wiechens@etrailer.com](mailto:Tamara.wiechens@etrailer.com)

### Meyer Distributing

560 E. 25<sup>th</sup> Street  
Jasper, OH 47546

Phone Number: (812) 481-7575

Contact: Scott Callison

Email: [Scott.Callison@meyerdistributing.com](mailto:Scott.Callison@meyerdistributing.com)

### Northern Wholesale Supply Inc.

6800 Otter Lake Road  
Lino Lakes, MN 55038

Phone Number: (952) 452-9520

Contact: Cassie Kiser

Email: [cassiek@northernwholesale.com](mailto:cassiek@northernwholesale.com)

### Techno RV

2421 Raymond Tanner Road  
Theodore, AL 36582

Phone Number (866) 324-7915

Contact: Derek Slaughter

Email: [Info@technorv.com](mailto:Info@technorv.com)

OrderDate	CustomerName	Customer Type	Order Status	Completed Date	Customer Ref	ProductCode	Quantity
5/31/2023	Best RV and Truck Supply	RV Aftermarket	Completed	5/31/2023 13:11	PO: 35152	B30ASSY-NT	4
5/31/2023	Best RV and Truck Supply	RV Aftermarket	Completed	5/31/2023 13:11	PO: 35152	B30ASSY-PB	1
5/31/2023	Best RV and Truck Supply	RV Aftermarket	Completed	5/31/2023 13:11	PO: 35152	B30ASSY-PW	1
5/31/2023	Best RV and Truck Supply	RV Aftermarket	Completed	5/31/2023 13:11	PO: 35152	BF30	2
6/6/2023	Etrailer	RV Aftermarket	Completed	6/8/2023 8:56	PO: 836580	B30ASSY-NT	10
6/6/2023	Etrailer	RV Aftermarket	Completed	6/19/2023 10:34	PO: 836556	B30ASSY-NT	10
6/6/2023	Etrailer	RV Aftermarket	Completed	6/19/2023 10:34	PO: 836556	R30303-BM30P	4
6/26/2023	Etrailer	RV Aftermarket	Completed	6/27/2023 7:27	PO: 909078	B30ASSY-PW	6
6/27/2023	Etrailer	RV Aftermarket	Completed	7/17/2023	PO:920191	BM30NT	12
5/31/2023	Meyer Distributing	RV Aftermarket	Completed	6/1/2023 7:32	PO: 0000927	BF30	60
5/31/2023	Meyer Distributing	RV Aftermarket	Completed	6/1/2023 7:32	PO: 0000927	BM30NT	12
6/8/2023	Meyer Distributing	RV Aftermarket	Completed	6/19/2023 10:54	PO: 0000925	B30ASSY-PB	30
6/21/2023	Meyer Distributing	RV Aftermarket	Completed	6/21/2023 13:24	PO: 0000925	B30ASSY-NT	60
6/21/2023	Meyer Distributing	RV Aftermarket	Completed	6/21/2023 13:24	PO: 0000925	BM30NT	12
6/7/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	7/11/2023	PO: Q05503	B30ASSYPB	12
6/7/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	7/11/2023	PO: Q05503	B30ASSYPW	6
6/7/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	7/11/2023	PO: Q05503	C30503BM30P	3
6/7/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	7/11/2023	PO: Q05503	BF30	12
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 13:34	PO: 354054	B30ASSY-NT	36
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 14:18	PO: 354055	B30ASSY-NT	12
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 14:18	PO: 354055	B30ASSY-PB	36
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 13:34	PO: Q04797	B30ASSY-PW	12
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 13:34	PO: 354054	BM30NT	24
6/9/2023	RV Wholesale of Texas	RV Aftermarket	Completed	6/20/2023 8:45	PO: 256948	BF30	13
6/9/2023	RV Wholesale of Texas	RV Aftermarket	Completed	6/20/2023 8:45	PO: 256948	BM30PW	6
6/27/2023	TechnoRV	RV Aftermarket	Completed	6/28/2023 13:34	PO: TRV-SM	BF30	2
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The part of concern was not manufactured by SmartPlug Systems, LLC. It is a component that is used in a SmartPlug Product. The name for the part is a D-Ring and is Manufactured by the Federal Group.

**The Manufacture of the D-Ring is:**

The Federal Group, USA  
102 NE 2<sup>nd</sup> Street, Suite 211  
Boca Raton, FL. 33432  
Phone (248) 545-5000  
Mike Allen  
[Mike@tfgusa.com](mailto:Mike@tfgusa.com)

II. Identification of the Recall Population and Its Size

Complete the tables below for each item of equipment subject to this notification. Additional tables may be necessary where there are more than three items subject to a notification.

**Total Units – 1,323**

RV Aftermarket - 398

RV OEM - 925

**RV Aftermarket**

OrderDate	CustomerName	Customer Type	Order Status	Completed Date	Customer Ref	ProductCode	Quantity
5/31/2023	Best RV and Truck Supply	RV Aftermarket	Completed	5/31/2023 13:11	PO: 35152	B30ASSY-NT	4
5/31/2023	Best RV and Truck Supply	RV Aftermarket	Completed	5/31/2023 13:11	PO: 35152	B30ASSY-PB	1
5/31/2023	Best RV and Truck Supply	RV Aftermarket	Completed	5/31/2023 13:11	PO: 35152	B30ASSY-PW	1
5/31/2023	Best RV and Truck Supply	RV Aftermarket	Completed	5/31/2023 13:11	PO: 35152	BF30	2
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6/6/2023	Etrailer	RV Aftermarket	Completed	6/19/2023 10:34	PO: 836556	B30ASSY-NT	10
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5/31/2023	Meyer Distributing	RV Aftermarket	Completed	6/1/2023 7:32	PO: 0000927	BM30NT	12
6/8/2023	Meyer Distributing	RV Aftermarket	Completed	6/19/2023 10:54	PO: 0000929	B30ASSY-PB	30
6/21/2023	Meyer Distributing	RV Aftermarket	Completed	6/21/2023 13:24	PO: 0000929	B30ASSY-NT	60
6/21/2023	Meyer Distributing	RV Aftermarket	Completed	6/21/2023 13:24	PO: 0000929	BM30NT	12
6/7/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	7/11/2023	PO: Q05503	B30ASSYPB	12
6/7/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	7/11/2023	PO: Q05503	B30ASSYPW	6
6/7/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	7/11/2023	PO: Q05503	C30503BM30P	3
6/7/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	7/11/2023	PO: Q05503	BF30	12
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 13:34	PO: 354054	B30ASSY-NT	36
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 14:18	PO: 354055	B30ASSY-NT	12
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 14:18	PO: 354055	B30ASSY-PB	36
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 13:34	PO: Q04797	B30ASSY-PW	12
6/27/2023	Northern Wholesale Suppl	RV Aftermarket	Completed	6/28/2023 13:34	PO: 354054	BM30NT	24
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6/9/2023	RV Wholesale of Texas	RV Aftermarket	Completed	6/20/2023 8:45	PO: 256948	BM30PW	6
6/27/2023	TechnoRV	RV Aftermarket	Completed	6/28/2023 13:34	PO: TRV-SM	BF30	2
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**RV OEM**

OrderDate	CustomerName	Customer Type	OrderStatus	CompletedDate	CustomerRe	ProductCode	Quantity
6/13/2023	ARI - Legacy Sleepers	RV OEM	Completed	6/19/2023 10:34	PO: 84751	105010601041	24
6/2/2023	Airstream Trailer Plant	RV OEM	Completed		PO: 0020931	105010401041	62
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:42	PO: 0020931	105010301041	24
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:41	PO: BCM092	105010301041	160
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:42	PO: 0020931	105010601041	6
6/8/2023	Airstream, Inc	RV OEM	Completed	7/12/2023	PO:1009354	105010302041	120
6/15/2023	Airstream Trailer Plant	RV OEM	Completed	6/28/2023 14:16	PO: 0100931	105010302041	120
6/16/2023	Airstream Trailer Plant	RV OEM	Completed	6/19/2023 10:33	PO: 0100926	105010301041	120
6/27/2023	Airstream Trailer Plant	RV OEM	Completed	6/28/2023 13:34	PO: TCM093	105010601041	50
6/19/2023	Chinook	RV OEM	Completed	6/20/2023 8:23	PO: 2361	105010401041	12
6/28/2023	Chinook	RV OEM	Completed	6/28/2023 13:34	PO: 2432	105010401041	12
6/19/2023	COACH HOUSE, INC.	RV OEM	Completed	6/20/2023 8:23	PO: 2231737	105010301041	12
6/15/2023	Dave Carter & Associates	RV OEM	Completed	6/19/2023 10:33	PO: 247681	105010401041	38
6/19/2023	Dave Carter & Associates	RV OEM	Completed	6/20/2023 8:23	PO: 248126	105010401041	27
6/20/2023	Dave Carter & Associates	RV OEM	Completed	6/20/2023 13:01	PO: 248604	105010401041	20
6/9/2023	Dave Carter & Associates	RV OEM	Completed	7/17/2023	PO:249216	105010401041	40
6/27/2023	Dave Carter & Associates	RV OEM	Completed	7/18/2023	PO:249839	105010401041	4
6/19/2023	EarthRoamer LLC	RV OEM	Completed	6/20/2023 8:23	PO: 0047146	105010401041	5
5/30/2023	Embassy RV	RV OEM	Completed	5/31/2023 8:22	PO: 9454	105010601041	4
5/30/2023	Embassy RV	RV OEM	Completed	5/31/2023 8:22	PO: 9225	105010601041	10
6/26/2023	Embassy RV	RV OEM	Completed	6/27/2023 7:28	PO: 9678	105010601041	10
6/26/2023	Embassy RV	RV OEM	Completed	6/27/2023 7:28	PO: 9623	105010601041	3
6/20/2023	Grit Overland	RV OEM	Completed	6/21/2023 7:43	PO: 00074	105010601041	15
5/30/2023	Just Roaming LLC	RV OEM	Completed	5/31/2023 8:22	PO: 1465	105030201041	15
5/30/2023	Waldoch Luxury	RV OEM	Completed	5/31/2023 8:22	PO: 64753	105010501041	12

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**Provide the following information as to all the items of equipment (“the recall population”) identified above:**

Grand total number of items of equipment in the recall population: 1,323 units

**The percentage of the recall population you estimate actually contains the defect or noncompliance:**

All Units Manufactured during that time frame used the Manganese D-Ring.

**Identify and describe how the recall population was determined (e.g., on what basis the recalled**

**models were selected and how the inclusive dates of manufacture were determined):**

The population was determined based on the start date that we introduced the new part into production. On June 1<sup>st</sup>, 2023, we converted to Manganese – Bronze D-Ring in our 30A and 16A Inlets.

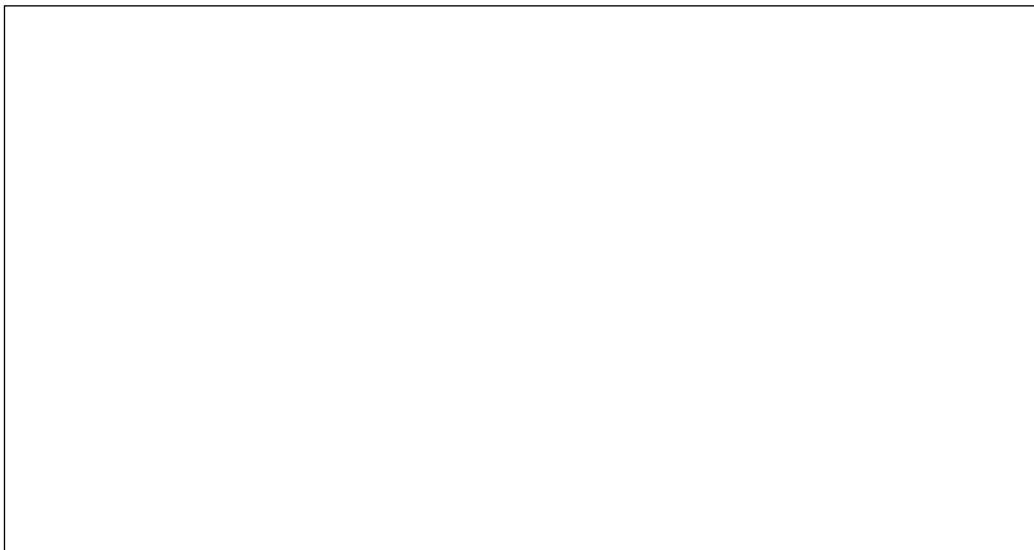
**Describe how the recall population is different from any similar items of equipment not subject to this notification:**

The recall population all contained the new Manganese – Bronze D-Ring.

### **III. Description of the Defect or Noncompliance and Chronology of Events**

**Describe the defect or noncompliance, including a summary and detailed description of the nature and physical location (if appropriate) of the defect or noncompliance. Graphic aids should be provided where necessary.**

The potentially defective part is a D-Ring used to attach a Shore Power Connector to supply power. The D-Ring is located on the back side of the Inlet Connector. It is under the Strain Relief. They are the terminals shown in the image below. There are 3 D-rings, one for the White Wire, one for the Black Wire and the other for the Green or Ground wire. The D-Ring in question is the Bronze color one on the right side of the image, see below.



**Describe the cause(s) of the defect or noncompliance condition.**

Over time while under pressure the Manganese -Bronze D-Ring could crack. This cracking could potentially affect the integrity of the electrical connection to the electric pins.

**Describe the consequence(s) of the defect or noncompliance condition.**

If the D-Ring cracks or fails, the Electrical connections to the inlet could be jeopardized. This could



cause arching on the pins, created corrosion, and eventually the loss of power.

**Identify any warning(s) that may precede the defect or noncompliance condition.**

You might be able to see a discoloration on the Electrical Pins, or you could notice that the Inlet connector gets hot to the touch, and you may experience a reduction in the power provide to the vehicle.

***For defects, provide a dated, chronological summary of all the principle events that were the basis for the determination that the defect is related to motor vehicle safety, including a summary of all warranty claims, field or service reports, and other information such as numbers of crashes, injuries, and fatalities.***

On July 17<sup>th</sup> we received a warranty call from a consumer who had purchased an Inlet, and he was installing it on his RV. During installation he noticed the D-Ring failure and called our warranty line. On July 20<sup>th</sup> we received an email from Airstream that they were seeing failures on their production line. After reviewing some photos from both the consumer and Airstream we pulled product from the shelf and ran a series of initial tests. The initial review didn't show any failures. We next set up a series of accelerated testing. During this testing we discovered the failure that both the consumer and Airstream saw. Since this New Manganese – Bronze was nice we made the decision to stop manufacturing, Quarantine all products until we completed further testing. Additional testing showed more failures and the decision to recall product was made.

***For noncompliance's, identify the test results and other information considered in determining the existence of the noncompliance, and provide the date of each test and observation indicative of that noncompliance.***

The Initial tests completed were a series of excessive torque tests. In these tests we increased the torque in increments reaching approximately 100in lbs. These parts were left under load and examined after 24 hours. After that test was completed the parts wer then subjected to accelerated tests that consisted of freezing and quenching parts to simulate years of performance in extreme weather conditions. These tests were run staring July 20<sup>th</sup>.

#### IV. The Remedy Program and Its Schedule

**Describe the program for remedying the defect or noncompliance, including the plan for reimbursing those owners and purchasers who may have incurred costs to remedy the defect or noncompliance before receiving the manufacturer's notification concerning that defect or noncompliance. Also include, where applicable, details with dates concerning any production remedy that was conducted or will be conducted.**

We are able to trace who received product and how many they received based on manufacture date. We have been able to link the PO, the Production Build, and the Product Shipment information and who received it.

A substantial portion of the product went to our OEM Customers who were able to return the product for Credit, (most of the product never got to the public). For the remaining product that went to the aftermarket we have contacted all of our customers who received products that was manufactured during the time frame when we used the Bronze D-ring. Each customer has been given instructions on how to identify product that has the Manganese-Bronze D-Ring and been asked to quarantine that product in their organization and return it for credit. There are a few customers where product did reach the public. Those customers are working on contacting their customers and informing them of the situation. We have agreed to pay for the freight to return product they had in their inventory, pay for the replacement costs for the product that was made to the public.

will be working with each customer to compensate them for their costs incurred and their efforts to find and remove products from the field.

As of July 24<sup>th</sup>, We are no longer manufacturing product with the Bronze D-ring. We are using the previous design which has been in the field for several years.

**Provide the estimated date(s) on which dealers, distributors, and purchasers notifications will be issued and the estimated date(s) for completion of those notifications.**

Process Started:

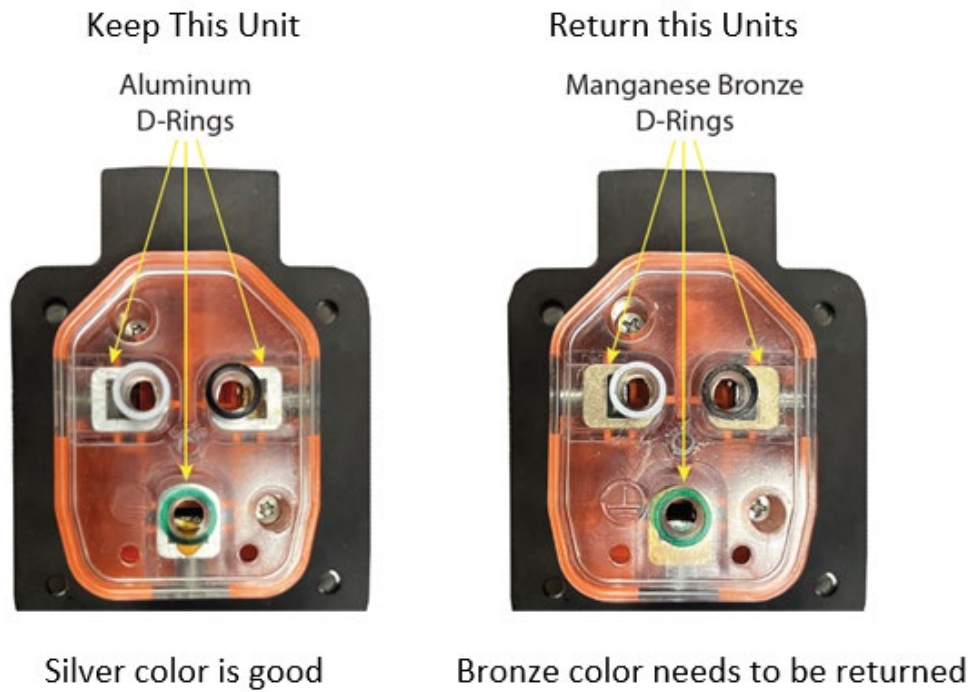
On July 24<sup>th</sup>, SmartPlug started contacting Customers who received product with the Bronze D-ring.

Process Completed:

On July 27<sup>th</sup> SmartPlug completed contacting all customers who received products with the Bronze D-Ring.

**Describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.**

The Difference is the color of the D-Ring. The Aluminum D-Ring is a Silver Color, and the Manganese Bronze is a Bronze Color. There are three D-Rings, one for each electrical terminal.



**\*\*\*\*\* IMPORTANT REMINDERS \*\*\*\*\***

A DRAFT version of the letter that the manufacturer intends to mail to owners and purchasers notifying them of the defect and/or noncompliance must be submitted to NHTSA at least five Federal Government business days before those letters are issued. In addition, it is recommended that the draft version of the letter that the manufacturer intends to send to its dealers and distributors concerning the defect and/or noncompliance also be submitted for review. For prompt receipt and review, drafts may be submitted to the attention of the Recall Management Division (NVS-215) via facsimile on (202) 366-7882, or email to RMD.ODI@dot.gov.

A representative copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance, and which are sent to more than one manufacturer, distributor, dealer, or purchaser, must be submitted to NHTSA no later than five days after they are initially sent. This requirement applies both to the final version of the notification letter that is sent to owners and purchasers, as well as the final version that is sent to dealers and distributors. It also includes any follow-up notifications issued concerning a recall. The representative copies of the letters sent to owners and purchasers, and dealers and distributors, must be submitted via certified mail. It is strongly recommended, however, that additional representative copies be submitted via facsimile on (202) 366-7882, or email to RMD.ODI@dot.gov, so that the submission can be more promptly reviewed. All submissions should be conspicuously labeled with the appropriate NHTSA-assigned recall number.