# 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

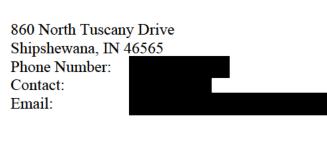
#### Chain of Distribution

SmartPlug Systems, LLC, is a USA Manufacturing Company that provide product 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 customer 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.

<ol> <li>Airstream Trailers</li> </ol>		
1001 West Pike St	reet	
Jackson Center, O	H 45334	
Phone Number:		
Contact:		
Email:		



3.) Chinook RV

Email:

1482 N. Eel River Cemetery Road

Peru, IN 46970

Phone Number: Contact:

r:

4.) Coach House, Inc.

3480 Technology Drive

Nokomis, FL 34275

Phone Number:

Contact: Email:



5.) David Carter & Associates

2432 Century Drive

Goshen, IN 46528

Phone Number:

Contact:

Email:



6.) EarthRoamer LLC

5073 Silver Peak Ave, Unit 3

Dacono, CO 80514

Phone Number:

Contact:

Email:



7.) Embassy Specialty Vehicles, LLC

2104 Aeroplex Drive North, Suite 101

Elkhart, IN 46514

Phone Number

Contact:

Email:



8.) Grit Overland 3612 P. Street

Washougal, WA. 98661
Phone Number
Contact:
Email:

9.) Just Roaming LLC 33505 SE 6<sup>th</sup> Street

Washougal,WA.98671

Phone Number:
Contact:
Email:

10.) Waldoch Luxury

13821 Lake Drive NE

Forest Lake, MN 55025

Phone Number: Contact:

Email:

OrderDate	CustomerName	Customer Type	OrdorStatus	CompletedDate	CustomerRef	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: 0020931293	105010301041	24
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:41	PO: BCM0929113	105010301041	160
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:42	PO: 0020931293	105010601041	6
6/8/2023	Airstream, Inc	RV OEM	Completed	7/12/2023	PO:100935441	105010302041	120
6/15/2023	Airstream Trailer Plant	RV OEM	Completed	6/28/2023 14:16	PO: 0100931664	105010302041	120
6/16/2023	Airstream Trailer Plant	RV OEM	Completed	6/19/2023 10:33	PO: 0100926084	105010301041	120
6/27/2023	Airstream Trailer Plant	RV OEM	Completed	6/28/2023 13:34	PO: TCM0936188	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: 1455	105030201041	15
5/30/2023	Waldoch Luxury	RV OEM	Completed	5/31/2023 8:22	PO: 64753	105010501041	12

# RV AFTERMARKET ACCOUNTS

Best RV and Truck Supply 818 N. Ouida Street Enterprise, AL 36330 Phone Number: Contact:	Email:
Etrailer 1507 E Highway A Wentzville, MI 63385 Phone Number: Contact:	Email:
Meyer Distributing 560 E. 25 <sup>th</sup> Street Jasper, OH 47546 Phone Number: Contact:	Email:
Northen Wholesale Supply Inc. 6800 Otter Lake Road Lino Lakes, MN 55038 Phone Number: Contact:	Email:
Techno RV 2421 Raymond Tanner Road Theodore, AL 36582 Phone Number Contact:	Email:

		Customer	Order	Completed	Customer		
OrderDate	CustomerName	Type	Status	Date	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-BM30PB	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: 0000927154	BF30	60
5/31/2023	Meyer Distributing	RV Aftermarket	Completed	6/1/2023 7:32	PO: 0000927154	BM30NT	12
6/8/2023	Meyer Distributing	RV Aftermarket	Completed	6/19/2023 10:54	PO: 0000929791	B30ASSY-PB	30
6/21/2023	Meyer Distributing	RV Aftermarket	Completed	6/21/2023 13:24	PO: 0000929442	B30ASSY-NT	60
6/21/2023	Meyer Distributing	RV Aftermarket	Completed	6/21/2023 13:24	PO: 0000929442	BM30NT	12
6/7/2023	Northern Wholesale Supply Inc	RV Aftermarket	Completed	7/11/2023	PO: Q05503	B30ASSYPB	12
6/7/2023	Northern Wholesale Supply Inc	RV Aftermarket	Completed	7/11/2023	PO: Q05503	B30ASSYPW	6
6/7/2023	Northern Wholesale Supply Inc	RV Aftermarket	Completed	7/11/2023	PO: Q05503	C30503BM30PB	3
6/27/2023	Northern Wholesale Supply Inc.	RV Aftermarket	Completed	6/28/2023 13:34	PO: 354054	B30ASSY-NT	36
6/27/2023	Northern Wholesale Supply Inc.	RV Aftermarket	Completed	6/28/2023 14:18	PO: 354055	B30ASSY-NT	12
6/27/2023	Northern Wholesale Supply Inc.	RV Aftermarket	Completed	6/28/2023 14:18	PO: 354055	B30ASSY-PB	36
6/27/2023	Northern Wholesale Supply Inc.	RV Aftermarket	Completed	6/28/2023 13:34	PO: Q04797	B30ASSY-PW	12
6/27/2023	Northern Wholesale Supply Inc.	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	12
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-SMP-TRV9	07 BF30	2

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

# II. <u>Identification of the Recall Population and Its Size</u>

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 – 1,248** RV Aftermarket - 385 RV OEM - 863

			Order		Customer		
OrderDate	CustomerName	Customer Type	Status	Completed Date	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
3/31/2023	best itt und Truck Supply	nv / iree market	Completed	3/31/2023 13:11	0.33132	2.33	_
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: 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	C30503BM30PE	3
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	12
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

		Customer					
OrderDate	CustomerName	Туре	OrderStatus	CompletedDate	CustomerRef	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		105010301041	24
6/2/2023	Airstream Trailer Plant	RV OEM	Completed	6/5/2023 11:41	PO: BCM0929	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:10093544	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	РО: ТСМ0936	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

Provide the following information as to <u>all</u> the items of equipment ("the recall population") identified above:
Grand total number of items of equipment in the recall population: 1,248 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.
and physical location (if appropriate) of the defect or noncompliance. Graphic aids should be

## 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, create corrosion, and could create an increased risk of fire.

## 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 20th 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 product 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 customer 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 product 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 would received product with the Bronze D-ring

#### Process Completed:

On July 27<sup>th</sup> SmartPlug completed contacting all customers who received product 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.



Silver color is good



Bronze color needs to be returned

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

A <u>DRAFT</u> 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.