

TRW Automotive  
Occupant Safety Systems

4505 W. 28 Mile Road  
Washington, MI 48094  
Tel 810.781.7200  
Fax 810.781.7340

01E-07 (01)

**TRW**

April 13, 2001

Mr. Kenneth N. Weinstein  
Associate Administrator for Safety Assurance  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Mr. Weinstein,

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, Defect and Noncompliance Reports, TRW Occupant Safety Systems is submitting the following information concerning a potential noncompliance with a motor vehicle safety standard and a potential defect in original equipment that may be related to motor vehicle safety.

573.5(c)(1) and (2)

The suspect equipment consists of certain seat belt assemblies manufactured by TRW Vehicle Safety Systems Inc. ("TRW"), 4505 West 28 Mile Road, Washington, MI 48094, telephone number (810) 781-7200, at the Reynosa, Mexico, production plant, for the Ford 2001 MY H215 platform in which a no-lock condition could occur within the 25mm @ 0.7g FMVSS 209 requirement in a post condition /durability cycled assembly. The TRW/Ford part number is YC4S65611B08 AAW and applies to a RH air ride seat application only. The suspect parts were manufactured by TRW between August 2000 and April 2001.

573.5(c)(3)

In August 2000 TRW shipped seventy two (72) RH air ride seat belt assemblies to Ford Motor Company of which 32 assemblies are believed to have been installed into vehicles and are considered 'in the field'.

573.5(c)(4)

It is unknown at this time how many seat belt assemblies from the suspect population actually contain the potential non-compliance.

573.5(c)(5)

The Ford H215 Truck platform (F650/F750) is a high GVW (i.e. >20,000 lb.) seat belt application in which the retractor was designed to reduce the potential for 'nuisance' lock ups from occurring. It is believed that as a result of such design, it is possible that an increased pawl to cam gap could result in no locks under the conditions specified in FMVSS 209.

573.5(c)(6) and (7)

During routine compliance surveillance testing of the suspect seat belt assembly at Dayton T. Brown on January 23, 2001, a no-lock condition was observed on three seat belt assemblies within the 25mm @ 0.7g FMVSS 209

requirement on post conditioned assemblies. TRW subsequently performed additional conditioning and testing of six seat belt assemblies from the same lot as the assemblies on which that Dayton T. Brown reported the anomaly. Completed testing of those assemblies to the Ford specification requirements produced one no-lock to their 26mm at .88g requirement in 1 direction (i.e., 27.2mm versus a 25.0mm maximum).

573.5(c)(8)

TRW is implementing permanent design changes to address the root cause of the potential no lock condition and new seat belt assemblies will be resubmitted to Dayton T. Brown (as well as tested by TRW) for certification prior to the next scheduled release requirements to Ford.

679.5(c)(10) and (11)

TRW has reported this matter to Ford Motor Company on April 10, 2001. A recall campaign number has not yet been assigned to this matter.

Very Truly Yours,

*Gary Flattery*

Gary Flattery  
Vice President, Quality

O/E-017 (2)

Occupant Safety Systems  
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Washington, MI 48094  
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02

December 12, 2001

Mr. Kenneth N. Weinstein  
Associate Administrator for Safety Assurance  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

**TRW**

01E-017

Dear Mr. Weinstein,

This letter supplements and revises the notification filed by TRW Occupant Safety Systems of TRW Vehicle Safety Systems Inc. ("TRW") on April 13, 2001 (the "April 13 letter") pursuant to 49 CFR Part 573 concerning a potential noncompliance with a motor vehicle safety standard and a potential defect in original equipment that may be related to motor vehicle safety.

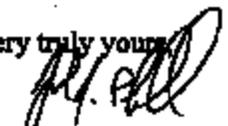
573.5(e)(3)

In August 2000 TRW shipped seventy two (72) RH air ride seat belt assemblies to the Sherer Truck Equipment Mexico facility, Carretera Animas-Coyotepec km2.0 Teoloyucan Exhacienda, San Jose Estado de Mexico 54616 (rather than to Ford Motor Company as stated in the April 13 letter). Of those assemblies, thirty six (36) (rather than the thirty two (32) reported in the April 13 letter) are reported by Ford to have been installed into vehicles. The balance of parts were returned to TRW and scrapped.

573.5(e)(10) and (11)

TRW reported this matter to Ford Motor Company and Sherer Truck Equipment on April 10, 2001. A recall campaign number of 01E-017 has been assigned to this matter by NHTSA, and an internal system number of 01V-06 has been assigned to the recall campaign by Ford Motor Company. As a "vendor recall", TRW will administer the campaign. TRW is working with Ford Motor Company to identify the names and addresses of the purchasers of the vehicles that contain the suspect seat belt assemblies. Owners will be contacted and arrangements will be made to have the suspect retractors replaced in the 36 vehicles. It is anticipated that owner notifications will be mailed before the end of December 2001. Replacement parts for all of the suspect units will be available at TRW's Del Norte Mexico plant at the time of the owner notification mailings.

Very truly yours,

  
Jack Phillion  
Vice President, Quality and Reliability  
TRW Automotive