VIA EMAIL (rmd.odi@dot.gov)

September 3, 2013

Ms. Nancy Lummen Lewis
Associate Administrator for Enforcement
ATTN: Recall Management Division (RMD-NVS-215)
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: NHTSA Recall 13E-044: Continental Aftermarket GmbH brake fluid

Pursuant to 49 CFR 573.6(c)(10), I am enclosing a representative copy of two notices, bulletins or other communications that relate to the noncompliance identified in the referenced recall campaign, and that were sent or are intended to be sent to more than one manufacturer, distributor, dealer or purchaser.

Please let us know if you need any additional information.

Sincerely,

John N. Garner
Senior Counsel, Commercial Legal Affairs
Continental Corporate Law Department
Phone: 847-862-1413
E-mail: John.Garner@continental-corporation.com

Enclosures

Continental
21440 W. Lake Cook Road
Deer Park, Il 60010
www.continental-corporation.com

ENCLOSURE ONE

From: Steve Lynch/ah/na/au/cag
To:
Date: 08/30/2013 07:02 AM

Super Blue Brake Fluid Distribution Recall Process August 30th 2013.pdf

Dear Valued Distributor:

As you know we have discontinued the distribution of ATE Super Blue Dot 4 Brake Fluid in the United States and Canada. The attached " Distribution Recall Process " document details the procedures to be followed for product returns. Please forward a copy of this email and process documents to known distributors and retail outlets in your distribution chain to inform them about these procedures. We appreciate your cooperation.

Sincerely, Steve

Stephen P. Lynch
Sales Manager Aftermarket
Continental ATE-VDO
6428 Sunset Bay Circle
Apollo Beach, Florida 33572
Phone 813-645-2769
Fax 813-645-2796
Cell 813-317-1330
steve.lynch@continental-corporation.com

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August 30, 2013

Distribution Recall Process
Continental Super Blue Racing Fluid
August 2013

Explanation of the Super Blue Racing Fluid Recall:

Effective immediately, Continental will be discontinuing the distribution of the ATE Super Blue Racing DOT 4 (ATE long part number 03.9901-6302.2 or short number 706302) brake fluid in the United States because it has determined that the brake fluid does not comply with the applicable Federal Motor Vehicle Safety Standard for brake fluid. The federal standard requires motor vehicle brake fluid to be colorless or amber in color.

What is the procedure for a distributor to return the product to Continental Allentown:

1. The distributor requests a Return Goods Authorization(RGA) for the return to be sent to Continental Allentown and indicates how many, if any, are containers that were returned by installers and/or end-consumers
2. Distributor ships product to Continental Allentown Freight Collect
3. Continental Allentown counts return quantity, reconciles the RGA, issues customer credit for product and freight

6755 Snowdrift Road
Allentown, PA 18106

Tel: (610) 366-8489

www.continental-corporation.com

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What is the procedure for a distributor if an end-consumer returns product to them:

1. The end-consumer contacts the distributor to return the product to them

2. End-consumer returns product to the distributor. Distributor accepts return as long as product is confirmed as ATE Super Blue Brake Fluid and it is in full and sealed cans

3. Distributor takes product back and reimburses end-consumer for the purchase price.
   - If no receipt is available then Continental recommends using the current distributor price

4. The distributor requests a Return Goods Authorization(RGA) for the return to be sent to Continental Allentown and indicates how many, if any, are containers that were returned by installers and/or end-consumers

5. RGA is only granted for full and sealed cans
   - Opened cans need to be disposed of by the consumer according to the requirements for disposal of such materials in the customers locality
   - See procedure below to advise the end-consumer how to handle open containers

6. Distributor ships product to Continental Allentown Freight Collect

7. Continental Allentown counts return quantity, reconciles the RGA, issues customer credit for product and freight

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What is the procedure for a distributor if an installer returns product to them:

1. The installer contacts the distributor to return the product to them
2. Installer returns product to the distributor. Distributor accepts return as long as product is confirmed as ATE Super Blue Brake Fluid and it is in full and sealed cans
3. The installer can ship the product freight collect to the distributor to then be reimbursed by Continental for freight expenses
4. Distributor takes product back and reimburses end-consumer for the purchase price.
   - If no receipt is available then Continental recommends using the current distributor price
5. The distributor requests a Return Goods Authorization(RGA) for the return to be sent to Continental Allentown and indicates how many, if any, are containers that were returned by installers and/or end-consumers
6. RGA is only granted for full and sealed cans
   - Opened cans need to be disposed of by the installer according to the requirements for disposal of such materials in the customers locality
   - See procedure below to advise installers how to handle open containers
7. Distributor ships product to Continental Allentown Freight Collect

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What is the procedure for a distributor if a Jobber returns product to them:

1. The Jobber store contacts the distributor to return the product to them
2. Jobber store returns product to the distributor. Distributor accepts return as long as product is confirmed as ATE Super Blue Brake Fluid and it is in full and sealed cans
3. The jobber store can ship the product freight collect to the distributor to then be reimbursed by Continental for freight expenses
4. Distributor takes product back and reimburses the jobber store at the purchase price.
    - If no receipt is available then Continental recommends using the current distributor price
5. The distributor requests a Return Goods Authorization(RGA) for the return to be sent to Continental Allentown and indicates how many, if any, are containers that were returned by installers and/or end-consumers
6. Distributor ships product to Continental Allentown Freight Collect
7. Continental Allentown counts return quantity, reconciles the RGA, issues customer credit for product and freight

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What is the procedure for a distributor if a retail store returns product to them:

1. The retail store contacts the distributor to return the product to them
2. The retail store returns product to the distributor. Distributor accepts return as long as product is Confirmed as ATE Super Blue Brake Fluid and it is in full and sealed cans
3. The retail store can ship the product freight collect to the distributor to then be reimbursed by Continental for freight expenses
4. Distributor takes product back and reimburses the retail store at the purchase price.
    - If no receipt is available then Continental recommends using the current distributor price
5. The distributor requests a Return Goods Authorization(RGA) for the return to be sent to Continental Allentown and indicates how many, if any, are containers that were returned by installers and/or end-consumers
6. Distributor ships product to Continental Allentown Freight Collect
7. Continental Allentown counts return quantity, reconciles the RGA, issues customer credit for product and freight

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What is the procedure for returning the product if the end-consumer or installer has an open can(s) and wants a refund:

1. End-consumer or installer contacts Allentown as they cannot return open containers at the distributor and retail levels

2. Opened containers need to be disposed of by the consumer according to the requirements for disposal of such materials in the customers locality

3. End-consumer or installer to provide proof of possession of open can(s) to Conti Allentown, via photo of the can

    - Photo must include customer's full name marked directly on the can with a Sharpie, and fully visible to photo view

    - If multiple open containers, photo must show all open containers and marked names on all

4. End-consumer or installer sends photo to Conti Allentown via mail or email (techsupport-us@vdo.com), along with their name, mailing address, and a way for us to contact them by phone or email if we have questions

5. Reimbursement of $20 per container of ATE Super Blue Brake Fluid, covering all cost, via check

6. Limit of one photo per container and duplicate photos will not be accepted for processing

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If you have questions or need additional information regarding this recall and discontinuation of ATE Super Blue Racing Brake Fluid, Continental customer service representatives are available by phone at 800-265-1818 and by email at techsupport-us@vdo.com.

We regret this inconvenience, and we appreciate your cooperation.

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ENCLOSURE TWO

Dear Consumer--

We suggest you return any unopened containers of ATE Super Blue Racing brake fluid to the place of purchase and request a refund of your purchase price. If you experience any problems doing that, please contact us for assistance.

Should you have an open container of ATE Super Blue Racing brake fluid, you will need to dispose of it according to the requirements for disposal of such materials in your locality. But first mark your full name on the outside of any open container with a Sharpie pen and take a photo that shows all open containers and where you marked your name. Then mail or email us (see our contact information below) that photo, along with your name, mailing address, and a way for us to contact you by phone or email if we have questions. We will mail you a check in the amount of $20 as reimbursement for each container of product. Limit of one photo per container and duplicate photos will not be accepted for processing.

Our mailing address: Continental Automotive Systems, Inc.
ATE Technical Support
6755 Snowdrift Road
Allentown, PA 18106

Our email address: techsupport-us@vdo.com

Our phone number: 1-800-265-1818

Thank you.