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## FAX COVER SHEET

FAX NUMBER TRANSMITTED TO: (202) 366-5310

To: Sam Campbell  
Of: NHTSA  
From: Charles R. Sutton  
Re: NVS-22SCa/OA-108-060106B  
Date: March 16, 2006  
Time:

DOCUMENTS	NUMBER OF PAGES*
Defect and Noncompliance Report	14

### COMMENTS:

Original WILL ~~NOT~~ follow.

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Safety Defect and Noncompliance Report Guide for Equipment  
**PART 573 Defect and Noncompliance Responsibility and Reports'**

On March 15, 2006, Poli-Auto, Inc. determined that a noncompliance with Federal Motor Vehicle Safety Standard No. 108 exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573, Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: March 15, 2006

Furnish the manufacturer's identification code for this recall (if applicable): N/A

1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Sonar Auto Parts Co., Ltd.; Milton Yang, No. 427 Sec. 2 Wen Hua Road, Panchiao, Taipei, Taiwan, R.O.C. 886-2-2256-1718 (fax 886-2-2252-1036)

And

Eagle Eyes Traffic Industrial Co., Ltd. , Long Feng Enterprise Company, Ltd.; Hong Ming Hsu, No. 19, Lane 764, Chung Shan N. Road, Yung Kang City, Tainan Hsien, Taiwan, R.O.C. 886-6-233-6618 (Fax 886-6-233-1522 or 886-6-233-4074)

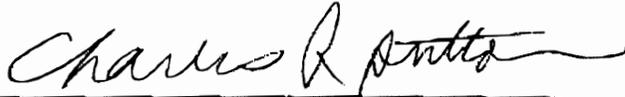
Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Milton Yang at Sonar Auto Parts 886-2-2256-1718 (fax 886-2-2252-1036); Hong Ming Hsu at Eagle Eyes Traffic Industrial Co., Ltd. 886-6-233-6618 (Fax 886-6-233-1522 or 886-6-233-4074)

Name and Title of Person who prepared this report. Charles R. Sutton, Law

**Offices of Roger C. Hsu, attorney for Poli-Auto, Inc.**

**Signed:**

A handwritten signature in cursive script, appearing to read "Charles R. Patton", written over a horizontal line.

1 Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part `573, "Defect and Noncompliance Responsibility and Reports" and also outlines information -currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at '(202) 366-5210 or by FAX at (202) 366-7\$82.

I. Identify the Recalled Items of Equipment

**2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:**

**Generic name of the item: Combination headlamp**

**Make: Honda Model: Civic**

**Part Number: 11-728 Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

**Civic '92 - '95 4 Door**

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**Make: Honda Model: Civic**

**Part Number: 11-728D Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

**Civic '92 - '95 2 or 3 Door**

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**Make: Honda Model: Civic**

**Part Number: 11-710 Size: N/A**

**Function: Illumination**

**Model Years Involved: '96 - '98 - '00 See Below**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

**Civic '96 - '98 4 Door and**

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**Civic '96 - '00 2 Door**

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**Make: Honda Model: Civic**

**Part Number: 11-419 Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

**Civic '99 - '00 4 Door and**

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**Civic '99 - Up 3 Door**

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I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:

Generic name of the item: **Combination headlamp**

Make: Honda Model: Civic

Part Number: 11-713 Size: N/A

Function: **Illumination**

Other information which characterizes/distinguishes the items of equipment to be recalled:

Civic '01 - '03

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Make: Honda Model: Accord

Part Number: 11-703 Size: N/A

Function: **Illumination**

Other information which characterizes/distinguishes the items of equipment to be recalled:

Accord '90 - '93

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Make: Honda Model: Accord

Part Number: 11-704 Size: N/A

Function: **Illumination**

Model Years Involved: '94 - '97 See Below

Other information which characterizes/distinguishes the items of equipment to be recalled:

Accord '94 - '97

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Make: Honda Model: Accord

Part Number: 11-708P Size: N/A

Function: **Illumination**

Other information which characterizes/distinguishes the items of equipment to be recalled:

Accord '98 - '00 4 Door and

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Accord '98 - '02 2 Door

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I. Identify the Recalled Items of Equipment

**2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:**

**Generic name of the item:**

**Make: Honda Model: Accord**

**Part Number: 11-735 Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

Accord '03

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**Make: Honda Model: Prelude**

**Part Number: 11-725 Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

Prelude '92 - '96

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**Make: Acura Model: Integra**

**Part Number: 11-726 Size: N/A**

**Function: Illumination**

**Model Years Involved: '90 - '93**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

Integra '90 - '93

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**Make: Ford Model: Bronco**

**Part Number: 11-716 (P & C) Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

Bronco / Ford F-150 Pick-Up '97

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1. Identify the Recalled Items of Equipment

**2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:**

**Generic name of the item: Combination Headlamps**

**Make: Ford Model: Mustang**

**Part Number: 11-721-1 Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

**Mustang '94 - '98**

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**Make: Ford Model: Expedition**

**Part Number: 11-733 Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

**Ford Expedition 2003**

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**Make: GMC Model: Trailblazer**

**Part Number: 11-729 Size: N/A**

**Function: Illumination**

**Model Years Involved: 2002**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

**GMC Trailblazer '02**

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**Make: GMC Model: Yukon Denali**

**Part Number: 11-730 Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

**Yukon Denali '01 - '03**

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I. Identify the Recalled Items of Equipment

**2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:**

**Generic name of the item: Combination Headlamps**

**Make: Toyota Model: Corolla**

**Part Number: 11-732 Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

Corolla '02 4 Door

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**Make: \_\_\_\_\_ Model: \_\_\_\_\_**

**Part Number: \_\_\_\_\_ Size: \_\_\_\_\_**

**Function: \_\_\_\_\_**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

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**Make: \_\_\_\_\_ Model: \_\_\_\_\_**

**Part Number: \_\_\_\_\_ Size: \_\_\_\_\_**

**Function: \_\_\_\_\_**

**Model Years Involved: \_\_\_\_\_**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

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**Make: \_\_\_\_\_ Model: \_\_\_\_\_**

**Part Number: \_\_\_\_\_ Size: \_\_\_\_\_**

**Function: \_\_\_\_\_**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

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Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1,1996, through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

100%

## II. Identifying the Recall Population

3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.

Items Model	Year	Number of Potentially Involved
11-728	Civic '92-95 4 door	217
11-728D	Civic '92-95 2/3 door	83
11-710	Civic '96-98-00	198
11-419	Civic '99-00 and '99-up	58
11-713	Civic '01-03	23
11-703	Accord '90-93	47
11-704	Accord '94-97	183
11-708P	Accord '98-00	45
11-735	Accord '03	0
11-725	Prelude '92-96	0
11-726	Integra '90-93	48
11-716 (P&C)	Bronco '97	395
11-721-1	Mustang '94-98	65
11-733	Expedition 2003	12
11-729	Trailblazer 2002	22
11-730	Yukon Denali '01-03	35
11-732	Corolla 2002	19

**Total Number Potentially Affected by the Recall: 1450**

**4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance: 100%**

**Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:**

The aftermarket combination headlamps made to adapt to certain makes and models of automobiles were determined upon inspection to lack certain required amber side reflectors. We don't actually manufacture the lamps in question, and the dates given in this report reflect the dates of the makes and models of the particular automobiles to which these combination headlamps are to be attached, (which is how we have organized our part numbers and records for these particular parts).

**III. Describe the Defect or Noncompliance**

**5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.**

**The combination headlamps in question have eliminated one of the required functions of the combination headlamps they were designed to replace, to wit, they lack certain amber reflectors.**

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

**This concerns an absence of amber side reflectors on certain combination headlamps.**

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

**The absence of the amber reflectors will have the consequence that drivers of other cars will not see an amber reflector where there is supposed to be one on the particular combination headlamps in question. The result of this is that they will not be able readily to determine the direction of orientation of the cars fitted with the noncompliant combination headlamps.**

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**Identify any warning which can. (a) precede or (b) occur.**

**There is not really a warning which will occur. It is visible from the outside of the lamp whether or not an amber reflector is present in the required position.**

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**If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.**

**Sonar Auto Parts Co., Ltd.; Milton Yang, No. 427 Sec. 2 Wen Hua Road, Panchiao, Taipei, Taiwan, R.O.C. 886-2-2256-1718 (fax 886-2-2252-1036)**

**And**

**Eagle Eyes Traffic Industrial Co., Ltd. , Long Feng Enterprise Company, Ltd.; Hong Ming Hsu, No. 19, Lane 764, Chung Shan N. Road, Yung Kang City, Tainan Hsien, Taiwan, R.O.C. 886-6-233-6618 (Fax 886-6-233-1522 or 886-6-233-4074)**

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**Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:**

**Milton Yang at Sonar Auto Parts; Hong Ming Hsu at Eagle Eyes Traffic Industrial Co., Ltd.**

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#### IV. Provide the Chronology in Determining the Defect/Noncompliance.

*If the recall is for a defect, complete item 6, otherwise item 7.*

**6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims. This investigation does not concern a defect.**

**7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.**

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Between February 23, 2006 and March 15, 2006 we did further research concerning the equipment found on the combination headlamps in question, and that found on the automobiles to which they were to be fitted, and we have determined that the combination headlamps listed herein are noncompliant as of march 15, 2006.

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#### V. Identify the Remedy

**8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a , manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.**

Post hoc remedies cannot be done to the combination headlamps without breaking them so we propose to replace the non-compliant lamps with compliant lamps. Those customers who can prove they incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of our notification to them of the recall will be reimbursed.

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9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

We will replace combination headlamps lacking the required amber side reflectors with combination headlamps having the required amber side reflectors.

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Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The remedy component will have an amber side reflector in the position called for by the relevant standard.

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Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field so state. If the product was discontinued, so state.

The product was discontinued. As far as production is concerned, we have ceased to import non-compliant headlamps and we do not manufacture any headlamps.

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VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

We propose to send a recall notice to our customers within two weeks. We will need about a month before we can actually begin replacement of lamps because we must have the replacement lamps shipped from overseas manufacturers.

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VII. Furnish Recall Communications

11. Furnish a final 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, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

*I will send the draft in a timely manner.*

Note: These documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.