

06E-064
(795.)

Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Responsibility and Reports¹

On July 10, 2006, Tradasonic [MFR] decided 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: July 10, 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.

Wang Lai International Co._____

2F.-1, No. 70 Yanping S. Rd._____

Taipei 100, Taiwan_____

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

Wilson Lee (President)_____

Telephone Number: 626-934-8884 Fax No.: 626-934-8885

Name and Title of Person who prepared this report.

Wilson Lee (President)_____

Signed:



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¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each noncompliance condition.

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) 366-7882.

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 Lamps

Make: _____ **Model:** For Make, Model and Part Numbers, see attached list.

Part Number: _____ **Size:**

Function: Combination lamps

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

These combination lamps do not include amber side reflex reflectors, while the original lamps being replaced do include the reflectors.

Make: _____ **Model:**

Part Number: _____ **Size:**

Function:

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

Make: _____ **Model:**

Part Number: _____ **Size:**

Function:

Model Years Involved:

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

Make: _____ **Model:**

Part Number: _____ **Size:**

Function:

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

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.

II. Identifying the Recall Population

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

Items Model	Year	Number of Potentially
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Involved

See attached list.

Total Number Potentially Affected by the Recall: 4,029

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the 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:

Items selected are front or near front mounted combination lamps that do not include amber side reflex reflectors.

III. Describe the Noncompliance

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

The combination lamps do not include amber side reflex reflectors, while the original lamps being replaced do include the reflectors.

Describe the cause(s) of the noncompliance condition.

The manufacturers did not include side reflex reflectors with the lamps. The lamps that were obtained did not include the reflectors.

Describe the consequence(s) of the noncompliance condition.

Vehicles that have non-compliant lamps present a danger to drivers by reducing vehicle visibility.

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

Not applicable.

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

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19888 Quiroz Court

Walnut CA 91789

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

Calvin Law, President

IV. Provide the Chronology in Determining the Noncompliance

6. 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.

Test results are not available. Tradesonic was informed by Jeffrey Giuseppe's letter dated May 16, 2006 that the combination lamps may not comply. FMVSS No. 108 indicates that the combination lamps need to include amber side reflex reflectors that are being replaced from the OEM lamps.

V. Identify the Remedy

7. A description of the manufacturer's program for remedying the 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.

Tradesonic will issue a recall to those customers who purchased the noncompliant combination lamps. A reimbursement will be made, along with shipping and handling. Sales and purchases of the combination lamps has been ceased.

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

Since Tradesonic is a distributor, not the manufacturer, the products can only be recalled and no longer be sold.

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

Not applicable.

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.

Products have been discontinued.

VI. Identify the Recall Schedule

9. 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.

Recall will be done immediately.

VII. Furnish Recall Communications

10. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the 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 noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to the Office of Defects Investigation by Fax (202-366-7882) for review prior to mailing.*

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

A copy of the completed Part 573 report guide should be faxed to:

Mr. Michael Cole at (202) 366-7097