

Safety Defect and Noncompliance Report Guide for *Equipment*

## PART 573 Defect and Noncompliance Report

Date: August 17, 2012

This report serves as **BESI, Inc.**'s notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a **defect may exist on a limited number of our Pro-Tech III's, the 3 point push button buckle. One side (tong) is not staying connecting properly for meeting the FMVSS 213 Standard** exists in certain **PRO-TECH III (30-0011-0145 or 30-0010-0145)**. **BESI, Inc** decided that this defect **could** exist in **a limited number of** these **units manufactured between 10/1/2011 to 05/11/2012**

## I. Manufacturer, Designated Agent, and Other Chain of Distribution Information

Manufacturer's corporate name: **BESI, Inc**Equipment's brand or trademark name owner(s) (where applicable): **PRO-TECH III**Designated Agent (imported equipment): **N/A**

If this notification concerns equipment that was installed in new motor vehicles or new items of motor vehicle equipment, identify by name, address, and telephone number each vehicle manufacturer and equipment manufacturer who purchased that equipment: **N/A**

If this notification concerns a defective or noncompliant component that the above identified manufacturer did not manufacture, identify that component and provide the name, address, and phone number of the manufacturer of the component (if this manufacturer is unknown, provide this information as to the supplier of the component):

30-0007 PLASTIC BUCKLE W/2 TINES ASSY

Component Industrial Inc  
NO. 19, Lane 54, SEC.1, Min-Sheng N. Rd.,  
KUE1-SHAN Hsiang, TAO-YUAN, TAIWAN 33391 R.O.C.  
TEL: 886-3-325-5083-4  
FAX: 886-3-325-3138

Name, address, email, and phone and fax numbers for the person(s) to whom inquiries about this report should be directed:

Sue Weaver and/or Karen Buerger  
9087 Sutton Place, Hamilton, OH 45011  
(O) 513-874-0232 (F) 513-874-0579

[sue.weaver@besi-inc.com](mailto:sue.weaver@besi-inc.com)[karen.buerger@besi-inc.com](mailto:karen.buerger@besi-inc.com)

Manufacturer's assigned campaign number (where applicable): **RMA586**

## II. Identification of the Recall Population and Its Size

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.

Type of equipment (e.g., tire, child restraint, headlamp): **Child securement for school bus**

Part/Model number: **Pro-Tech III 30-0011-0145 & 30-0010-0145**

Size and function (where applicable): **Add on item for school bus transportation only**

Inclusive dates of manufacture (month and year): **10/2011 to 5/2012**

Other information necessary to describe this equipment: **N/A**

Total number of these items of equipment: **3532**

Type of equipment (e.g., tire, child restraint, headlamp): **N/A**

Part/Model number:

Size and function (where applicable):

Inclusive dates of manufacture (month and year):

Other information necessary to describe this equipment:

Total number of these items of equipment: **N/A**

Type of equipment (e.g., tire, child restraint, headlamp): **N/A**

Part/Model number:

Size and function (where applicable):

Inclusive dates of manufacture (month and year):

Other information necessary to describe this equipment:

Total number of these items of equipment: **N/A**

Provide the following information as to all the items of equipment ("the recall population") identified above: **3532**

Grand total number of items of equipment in the recall population:     **3532**    

The percentage of the recall population you estimate actually contain the defect or noncompliance:

    **5%**    

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):

**Customer complaint "one tongue of the buckle not catching" pulls out. This part is only used on one of our products the Pro-Tech III. With the customer complaint that came in we**

**were able to determine the date the item was produced, as well as when the batch of buckles were used. On the date of the complaint all Pro-Tech III's were inspected as well as all remaining buckles are being inspected.**

Describe how the recall population is different from any similar items of equipment not subject to this notification: **This type of buckle is only used on this one product Pro-Tech III**

### 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.

**The one tong is pulling out of the buckle after being clicked into the buckle with minimal hand pulling pressure. (See attached print)**

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

**The buckle manufacturer Component Industrial Inc, found that the "engaged plate" is not sharp enough due to Tumbling De-Burr or Zn-Plating process**

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

**As shown in the attached print (Sec: A-A) shown, 1.7 m/m point due to heavy polishing it is not sharp enough to engage firmly with 2 m/m buckle tongs.**

**One side of the buckle tong will pull out with less pull force of 2,499.875 pounds per FMVSS209 structural component standard.**

Identify any warning(s) that may precede the defect or noncompliance condition.

**Could result in the securement failing to provide the proper protection for the occupant in the event of a crash.**

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.

**Two complaints were called in by the customer stating the buckle was not staying closed. First customer called on 4/24/12 about one unit. We issued an RMA563 receiving product back on 05/10/2012. Second customer called on 4/30/2012 about nine units. We issued an RMA 564 receiving product back on 06/27/2012. Both RMA's were inspected; the buckle was replaced with the units being sent back to the customers, at our expense. No crashes, injuries or fatalities have been reported.**

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 vendor was notified of the defect on 05/10/2012. Vendor was sent defective samples on 05/15/2012. Vendor reports back with C.A.R. results sent with testing procedure and pictures (see attached)**

#### 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.

**As of 05/11/2012 BESI Inc performed a 100% inspection on all finished and in-process product in its facilities at the time of the defect discovery. BESI Inc will continue to perform inspection on all buckles that are received in.**

**The plan for reimbursing owners and purchasers will be return and repair/replace and resend at the expense of BESI, Inc**

**As of 08/13/2012 BESI, Inc is establishing a Batch/Lot tracking system for vendor products to ensure component traceability.**

**Researching equipment available and/or outside company services to perform batch/lot testing of components to see if this is an avenue that is pursuable.**

**As of 05/16/2012 Samples were sent to vendor for review. As of 08/13/2012 vendor stated they would re-work the tool before producing anymore like product.**

Provide the estimated date(s) on which owner and purchaser notifications will be issued and the estimated date(s) for completion of those notifications.

**Notifications will be issued the week of 08/20/2012 or as soon as we received approval from NHTSA and completion of the notifications by 08/31/2012**

Provide the estimated date(s) on which dealer and distributor notifications will be issued and the estimated date(s) for completion of those notifications.

**Notifications will be issued the week of 08/20/2012 or as soon as we received approval from NHTSA and completion of the notifications by 08/31/2012**

Describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

**The distinguishing characteristics will be that that tongs cannot be pulled out by hand without first pushing the release button. Versus the recalled component that can be pulled out by hand.**

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

A DRAFT 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.