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(4 pages) Amended

Sika Corporation USA · 201 Polito Avenue · Lyndhurst, NJ 07071 · USA

Nancy L. Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590
Attn: Recall Management Division

CONTACT

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BY EMAIL (rmd.odi@dot.gov)

April 2, 2012
(amended April 9, 2013)

Dear Ms. Lewis:

The following information is submitted in accordance with the National Highway Traffic Safety Administration's defect reporting regulations, 49 CFR Part 573.6.

Sika Corporation ("Sika") has decided to voluntarily recall a limited quantity of its SikaTITAN® P2G⁺ automotive glass bonding adhesive due to the risk of product failure. The recalled products were manufactured by Sika and sold to eight customers for use in the installation of aftermarket automotive glass products.

Product Identification

This recall involves a limited quantity of SikaTITAN® P2G⁺ Product Code 408804 packaged on October 6, 2012 and sold to eight customers for use in the installation of aftermarket auto glass. This recall involves 1,152 "unipacs", i.e., one pallet of 864 unipacs and a partial pallet of 288 unipacs out of a total of 9 full pallets and one partial pallet of unipacs packaged on October 6, 2012 as Lot Number 3000409314 and identified on the label by Lot Number 3000409314, Expiration Date: 6 July 2013, Product Code 408804, and a time stamp of between 2:45 and 2:56 a.m. recording the time of manufacture.

Recall Population

Based on an analysis of production data, Sika believes that the defect condition affects at most approximately 60 unipacs of SikaTITAN® P2G⁺ adhesive packaged during a limited production period on October 6, 2012. Out of an abundance of caution, Sika is recalling one entire pallet of 864 unipacs and a partial pallet of 288 unipacs (for a total of 1,152 unipacs) believed to include these contaminated unipacs. Based on the estimated amount of

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SikaTITAN® P2G⁺ needed to bond one windshield into a car, Sika believes that approximately 1,486 vehicles could potentially have had defective material applied if the entire full pallet of material and the partial pallet were affected.

Description of Defect

SikaTITAN® P2G⁺ is an adhesive product used in the installation of automotive glass to secure the glass material to the vehicle. As a result of a production anomaly, a limited quantity of product was contaminated during the packaging process. As a consequence, the product may not sufficiently cure or harden, thereby creating a risk that the glass may not be fully secured to the vehicle. If this condition is undetected, the glass may be displaced or fall out unexpectedly, causing injury to vehicle occupants, property damage, or a vehicle crash.

Chronology of Events

On or about December 19, 2012, a customer reported to Sika that the contents of one unipac of SikaTITAN® P2G⁺ appeared thin and did not display good decking qualities. Decking is the product's ability to hold the windshield in place during the installation and cure process without additional tools such as tape. The auto glass shop was told not to use any more product from this case. No windshield was installed with the material. Based upon this customer report, Sika checked production retain sample product, but did not identify any problems with the material. A subsequent sample of the SikaTITAN® P2G⁺ received from the auto glass shop was also tested by Sika on February 11, 2013 and again no issues were found.

On or about January 29, 2013, Sika was notified by a second customer whose auto glass shop customer reported that an application of SikaTITAN® P2G⁺ (on January 26) appeared to be of poor quality. The glass shop had performed two other installations using product from the same case as the apparent poor quality product. Sika advised the auto glass shop to not to use any additional material from the suspect case and, as a precaution, advised the glass shop to re-install the windshields on the two vehicles. Those two windshields were in fact reinstalled. Sika collected samples of the SikaTITAN® P2G⁺ from the customer which were sent to its Madison Heights, Michigan facility for evaluation. The samples were then sent to Sika's Lyndhurst, New Jersey facility for further testing between March 14 and March 25, 2013.

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On March 26, 2013, Sika completed its evaluation of the samples and determined that they were contaminated and that, as a result of the contamination, the material may not cure properly when applied during installation. Sika analyzed production records to determine the scope of the contamination. Based on that analysis, Sika concluded that the contamination involved at most 60 unipacs that were packaged during a limited production period on October 6, 2012. As a result of this evaluation, Sika made a determination that a safety defect may exist among unipacs within this population.

The 60 affected unipacs were part of one pallet of 864 unipacs and a partial pallet of 288 unipacs. Out of an abundance of caution Sika has decided to recall the full pallet and the partial pallet to recover the affected unipacs. Based on the number of unipacs on the pallets affected and the estimated amount of SikaTITAN® P2G⁺ needed to install one windshield, Sika estimates that approximately 1,486 vehicles may potentially have had the contaminated material applied, although only a small percentage at most, approximately 5 percent of those installations, are estimated to actually involve defective material.

Sika has implemented new quality control and production procedures to prevent similar contamination from occurring in the future.

Remedy Program

The remedy involves removing the windshield or other affected glass and reinstalling the glass (or, where necessary, new glass) with new adhesive product. A team of employees from Sika will contact potentially affected vehicle owners and, with the assistance of Sika's customers, will inspect potentially affected vehicles for this condition and make the necessary repairs free of charge.

All affected customer locations have been advised to search for and return any unsold inventory of the contaminated SikaTITAN® P2G⁺ for replacement.

Pre-Notification Reimbursement

Pursuant to 49 CFR §577.11(e), Sika requests that it be exempt from providing notification of a reimbursement plan. Any pre-notification product failure would have been replaced under the manufacturer's limited warranty. Accordingly, no consumer would be eligible for reimbursement pursuant to §573.13.

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Part 577 Owner Letter and Dealer Notification

Sika is in the process of notifying affected customers (distributors/dealers) regarding this issue. Copies of distributor/dealer communications will be provided within five business days after they are sent. We will provide a draft Part 577 owner letter shortly and will work with customers to identify and notify affected consumers. We anticipate commencing owner notification within seven days following approval of the draft letter (depending upon the availability of consumer contact information). Sika, in cooperation with at least one of its customers, has begun informally notifying potentially affected consumers of this concern.

* * *

Please advise me of the campaign number assigned to this recall.

Sincerely,



Steve Rosenberg
Senior Vice President Research and Development

cc: Jacqui Lumley, Esq., Sika Corporation
Christopher H. Grigorian, Foley & Lardner LLP