

Safety Defect and Noncompliance Report Guide for Equipment

PART 573 Defect and Noncompliance Report

Date: May 28, 2013

This report serves as Brake Parts Inc. LLC (BPI) notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a defect related to motor vehicle safety exists in certain Bosch Hydro-Max brake master cylinders. Bosch the Manufacturer of the master cylinder decided that a defect existed in these components manufactured between July 1, 2011 and April 12, 2012. Through our distribution to our customers, they could have been installed on vehicles and thus the reason for the Recall to BPI customers.

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

Manufacturer's corporate name: Brake Parts Inc. LLC

Equipment's brand or trademark name owner(s) (where applicable):

Raybestos Part Number – MC390565, NAPA Part Number 390565,

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CARQUEST Part Number E151557, GM AC Delco 18M870  
\_\_\_\_\_

Designated Agent (imported equipment): \_\_\_\_\_  
\_\_\_\_\_

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:  
Not applicable.

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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): Bosch Hydro-Max Master Cylinder – see attached 573.

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Name, address, email, and phone and fax numbers for the person(s) to whom inquiries about this report should be directed: Terry Heffelfinger Brake Parts Inc. LLC 4400 Prime Parkway, McHenry, IL [Terry.Heffelfinger@brakepartsinc.com](mailto:Terry.Heffelfinger@brakepartsinc.com)

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Manufacturer’s assigned campaign number (where applicable): 13E011000

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): Hydro-Max Brake Master Cylinder
Part/Model number: Base part number 63-390565 - see other part numbers and brand info above
Size and function (where applicable): 2.0 inch Bore and 84 Cubic Inch Reservoir
Inclusive dates of manufacture (month and year): July 1, 2011 to April 12, 2012
Other information necessary to describe this equipment:
Total number of these items of equipment: 624

Type of equipment (e.g., tire, child restraint, headlamp):

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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:

Type of equipment (e.g., tire, child restraint, headlamp):
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:

Provide the following information as to all the items of equipment (“the recall population”) identified above:

Grand total number of items of equipment in the recall population: See Bosch 573

The percentage of the recall population you estimate actually contain the defect or noncompliance: See Bosch 573

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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): See Bosch 573

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Describe how the recall population is different from any similar items of equipment not subject to this notification: See Bosch 573

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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. See Bosch 573

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Describe the cause(s) of the defect or noncompliance condition. See Bosch 573

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Describe the consequence(s) of the defect or noncompliance condition. See Bosch 573

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Identify any warning(s) that may precede the defect or noncompliance condition. See Bosch 573

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*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. See Bosch 573

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*For noncompliances*, 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.

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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. BPI has issued customer letters to our direct buying customers and letters for the customers. This has already been supplied to NHTSA.

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Provide the estimated date(s) on which owner and purchaser notifications will be issued and the estimated date(s) for completion of those notifications. Customer letters have already been sent out and BPI has replacement fluid level switches to send to vehicle owners with vehicles that need replacement.

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Provide the estimated date(s) on which dealer and distributor notifications will be issued and the estimated date(s) for completion of those notifications. Customer letters have already been issued and BPI has created a log for capturing customers with affected product.

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Describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly. See Bosch 573 with pictures.

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**\*\*\*\*\* 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.

BPI manufactures markets and distributes Aftermarket brake parts to various customers including Raybestos (our house brand) and private brand customers such as NAPA, CARQUEST and AC Delco. We purchase the Hydro-Max master cylinder base part number 390565 from Robert Bosch LLC and distribute to our customer base. We have received notice from Mike Burrill Director, of Quality – Chassis Control, in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act and a copy of their 573 is attached for reference. BPI acknowledges that we have received 624 pieces from Bosch of the defective units.

Our records indicate that we have four different brands and finished good part numbers of the replacement Bosch Hydro-Max master cylinder that were distributed to our direct customer base. We have decided, based on input from Bosch and the 573 provided to us by them, that the defect which relates to motor vehicle safety exists and is reportable to our customers. BPI has compiled, from our records, the specific ship to names and addresses of customers that have been shipped this replacement part. However, BPI does not have knowledge as to whether the part has been installed on any vehicles.