

13E-032
(6 pages)

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By Recall Management Division at 8:42 am, Jun 05, 2013

May 29, 2013

**Certified Mail - Return Receipt Requested
and Electronic Mail**

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE.
Washington, DC 20590

Dear Sir or Madam:

Our client Stoneridge Inc. ("Stoneridge") hereby informs you of its intention to conduct a voluntary safety related recall for certain ignition switches as set forth in the enclosed Part 573 Defect and Noncompliance Report. Per the provisions of 49 CFR 573.6(b), the information required by paragraphs (1) (2) and (5) of paragraph (c) of this regulation and other available information are submitted herewith as an initial report. The remainder of the information required by paragraph (c) of 49 CFR 573.6 will be submitted as it becomes available.

Our client has notified all dealers and distributors to whom it has sold these products to stop sale, distribution, use or installation of these products, and to quarantine them pending further instructions.

Stoneridge is voluntarily recalling these ignition switches out of an abundance of caution. Please note that there have been two reported incidents related to these ignition switches. Neither of these involved vehicle owners. There have been no reports of injury or accidents related to the affected ignition switches.

Please feel free to contact me at any time if you have any questions or wish to discuss this matter.

Very truly yours,



Cheryl A. Possenti

CAP/tb
Enclosure
cc: Mark Pelletier
Quality Manager
1043438.1

Safety Defect and Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Report¹

Stoneridge Inc. has determined that a potential defect which relates to motor vehicle safety 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 Reports.

Date this report was prepared: May 29, 2013

Furnish the manufacturer's identification code for this recall (if applicable): _____

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.

Stoneridge Inc. ("Stoneridge")
Control Devices
300 Dan Road
Carlton, Massachusetts 02021

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

Mark Pelletier
Quality Manager

Telephone Number:
781-830-0340

Fax No.:
781-830-9570

Name and Title of Person who prepared this report.

Mark Pelletier
Quality Manager

Signed: Mark Pelletier

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 Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or E-Mail to RMD.ODI@dot.gov.

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:

Part Number: 31-110, 31-397, 31-400, 31-322, 31-409, 31-458, 31-498-01P, 31-610,

Function: Ignition Switch

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

Date Code 183 only

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 Equipment equipped with certain items of equipment from January 1, 1996, through April 1, 1997, then what was the percentage of the recalled Equipment of all Equipment manufactured during that time period.

Stoneridge believes the only potentially affected ignition switches are those that bear date code 183.

II. Identifying the Recall Population

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

<u>Model</u>	<u>Year</u>	<u>Number of Items Potentially Involved</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Total Number Potentially Affected by the Recall: _____

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

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: _____

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.

Some ignition switches that bear date code 183 may have retention forces on the rivet that holds the contact wiper assembly together inside the switch that exhibit a downward shift in process capability but still within design criteria. This could potentially lead to unintended ignition.

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

If a rivet is displaced because of lower retention forces, a short circuit between the BAT and ST contacts could occur.

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

If the retention forces on the rivet described above exhibit a downward shift in process capability, and if a short circuit occurs, this could present the possibility of an unintended ignition.

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

The possible circumstances or potential warnings that may precede this event are currently unknown.

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

Not applicable.

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

Not applicable.

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.

Received 5 switches returned from PACCAR on 5/16/2013, all five of these switches had loose contact wiper rivets. Root cause was identified on 5/16/2013 as a broken spring on the rivet machine that caused a process shift. On 5/21/2013 PACCAR deemed this as a safety issue; Stoneridge performed testing and also deemed this issue to be a potential safety concern. No accidents, injuries, fatalities or warranty claims have been made.

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.

V. Identify the Remedy

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

Do not install ignition switches with the manufacture date code of 183, if already installed remove and install a new ignition switches from another manufacture date.

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

The replacement ignition switch will have a manufacture code other than 183 stamped on the face of the ignition switch when viewed from the key side of the ignition switch. The switch will need to be removed from the vehicle to read the manufacturing code.

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 recall condition was corrected by replacing the broken spring in the wiper rivet assembly machine

VI. Identify the Recall Schedule

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.

VII. Furnish Recall Communications

9. 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) or by E-Mail (*RMD.ODI@dot.gov*) for review prior to mailing.

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