



June 13, 2013

Nancy Lewis, Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
West Building, Fourth Floor  
Washington, DC 20590

**Re: Part 573 Defect Information Report**

Dear Ms. Lewis:

Pursuant to the requirements of 49 C.F.R. Part 573, and on behalf of Tesla Motors, Inc. ("Tesla" or "the Company"), this letter advises you of a possible defect related to safety in certain model year 2013 Tesla Model S vehicles. Specifically, and as outlined below in greater detail, Tesla submits this report regarding possible defects related to the second row left hand seat striker utilized to retain the back portion of the left hand seat in the upright latched position. During installation, some second row left hand seat strikers may have been subject to adjustments that compromise the integrity of the striker mount.

**573.6(c)(1): Manufacturer's Name**

Tesla Motors, Inc.  
3500 Deer Creek Road  
Palo Alto, CA 94304

**573.6(c)(2): Identification of the Vehicle Impacted**

<b>Make</b>	<b>Model</b>	<b>Model Year</b>	<b>Inclusive Dates of Manufacture</b>
Tesla	Model S	2013	May 10, 2013 – June 8, 2013

**573.6(c)(3): Total Number of Vehicles Potentially Containing the Defect**

1,228 vehicles released outside of Tesla's control.

**573.6(c)(4): Percentage of Vehicles Estimated to Contain the Defect**

Tesla believes that the defect identified below involves approximately 20% of the total affected vehicle population.

573.6(c)(5): Description of Possible Safety-Related Defect

Model year 2013 Model S vehicles are equipped with a second row seat with a seat back capable of pivoting between a stowed position that allows for expanded use of the area for cargo-carrying purposes and an upright position where the seat back frame is generally perpendicular to the seat cushion. When folded for cargo-carrying purposes, the seat back for the second row rests on the horizontal portion of the seat cushion. When upright for passenger carrying purposes, the seat back is locked into place with a latch on the seat back that contacts a striker mounted to the vehicle frame. The striker is bolted to a bracket, which is welded and bonded to the vehicle frame. On May 10, 2013, the design of the joint between the bracket and the vehicle frame was redesigned to improve function and reduce weight. This new design was extensively tested and, along with other seat mounting systems, is in full compliance with all federal motor vehicle safety standards.

Based on the redesign, Tesla learned that during vehicle assembly, the striker and plate did not line up precisely enough in some cars to allow engagement of the left hand seat back latch and the striker in a reliable manner. The right hand seat back latch was not affected since the redesign did not result in alignment issues on that side of the vehicle. Adjustments to the alignment of the left hand seat back striker were improperly made through use of hammer force rather than shimming. As a result of the use of imprecise blunt force, certain second row left hand strikers may have had the weld between the striker mounting plate and vehicle frame compromised. If the welded joint is compromised, there is a possibility that the left hand seat back would not be retained in all eventualities.

573.6(c)(6): Chronology of Principal Events

On June 7, 2013, a technician on the assembly line was adjusting the alignment for the newly designed left hand second row seat striker utilizing a slide hammer when he noticed the action caused the striker to become loose. Concerned about this issue, he immediately brought this to the attention of the manufacturing line manager who quickly elevated the issue to Tesla's Quality Department. Upon review, Tesla Quality determined that the weld and bonding between the second row left hand seat striker mounting plate and the vehicle was compromised due to this method of adjustment. In addition to quarantining the vehicle, Tesla began an internal investigation into the cause of the compromised weld and the extent of the issue. During this internal investigation, the Company learned that the new design of the striker bracket resulted in imprecise alignment of the striker to the left hand seat back during assembly. Tesla also discovered that based on the design of the striker and mounting to the vehicle, use of slide hammers to align the left hand striker could potentially compromise the striker mount's weld and bond integrity.

The use of a slide hammer to adjust door and tailgate strikers is an industry standard method of adjustment in instances where the striker has a floating nut plate. In the case of the second row striker, Tesla's investigation determined that the welded mounting plate location very close to the striker and the lack of a floating nut plate made use of slide hammers inappropriate for second row seat striker adjustment.

Telsa was able to confirm that this issue is isolated only to the revised left hand striker bracket design and does not affect the previous design nor the right hand side striker bracket, as there were no alignment issues on the right side of the vehicle. In addition, all other strikers installed on Model S do not have the same vulnerability to slide hammer damage as the redesigned rear seat

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strickers. Tesla has revised assembly procedures and retrained manufacturing technicians in the proper method of second row seat striker mount assembly, including adjustments to alignment through shimming versus use of a slide hammer.

Tesla notes that the Company has not received any concerns or complaints from customers, Stores or Service Centers, nor has the company received any report of accident or injury related to this issue. Tesla has determined, however, that a voluntary recall is appropriate as a precautionary measure.

573.6(c)(8): Proposed Remedy

Tesla plans to recall all potentially affected vehicles and inspect the left hand second row strikers, in addition, regardless of inspection outcome, Tesla will also utilize additional mounting hardware between the left hand striker bracket and the vehicle frame of all identified vehicles in the suspect population to ensure a validated joint between the left hand striker bracket and vehicle frame.

Tesla plans to notify Tesla Stores and customers as soon as possible regarding this recall. Tesla authorized Service Centers and Tesla Rangers will be able to implement the remedy upon notification to customers. A copy of the proposed customer notification letter and recall bulletin are attached.

If you or your staff has any questions, please feel free contact me at (202) 549-9819.

Sincerely,



James C. Chen, Director of Public Policy &  
Associate General Counsel for Regulatory Affairs

cc: Frank Borris, Director, Office of Defects Investigation  
Jennifer Timian, Director, Recall Management Division