



July 11, 2013

**BY Certified Mail**

Ms. Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attention: Recall Management Division (NVS-215)  
1200 New Jersey Avenue SE, Room W45-306  
Washington, DC 20590

Re: Defect Information Report  
Pursuant to 49 CFR 573.6 (c)

Dear Ms. Lewis:

The following information is submitted by Nissin Kogyo Co., Ltd. ("NK") in accordance with 49 CFR Section 573.6 (c).

1. Manufacturer name : 573.6 (C)(1)  
Nissin Kogyo Co., LTD., a Japanese corporation  
Headquarters: 840 Kokubu, Ueda-shi, Nagano-ken, 386-8505, Japan  
Preparer of this report: Kazuya Sato, Director and Chief Quality Officer  
Phone: +81-268-24-3111  
Fax: +81-268-21-2533

NK does not directly export the products at issues to the U.S.

2. Identification of the motor vehicle equipment : 573.6 (C)(2)  
The relevant product is an antilock braking system (ABS) modulator for motorcycles (NK part number NK2R3) that was produced by NK at Ueda facility between June 18, 2012 and March 22, 2013 and sold to four customer companies.  
The relevant customers are those given in Section 3.

3. The total number of items of equipment: 573.6 (C)(3)
  - (a) Triumph Motorcycles Limited  
Normandy Way, Hinckley  
Leicestershire LE10 3BZ England



Phone: +44-1455-453234

Relevant product count: 10,903

Relevant product numbers (3 models):2021481 / 2021482 / 2021483

(b) Kawasaki Heavy Industries, Ltd.

1-1, Kawasaki-cho, Akashi, 673-8666 Japan

Phone: +81-78-921-1301

Relevant product count: 14,471

Relevant product numbers (2 models):16082-0726/16082-0729

(c) Suzuki Motor Corporation

300 Takatsuka-cho, Hamamatsu, 432-8611 Japan

Phone: +81-53-440-2061

Relevant product count: 4,616

Relevant product numbers (1 model):55600-15H01

(d) Honda Motor Co., LTD

2-1-1 Minami-Aoyama, Minato-ku, Tokyo 107-8556 Japan

Phone: +81-3-3423-1111

Relevant product count: 880

Relevant product numbers (1 model): 57110-MJF-C120

Accordingly, the total number of items of equipment recalled will be 30,870. The total number motorcycles potentially affected by the recall is unknown.

4. The percentage of items of equipment estimated to contain the defect: 573.6 (C)(4)

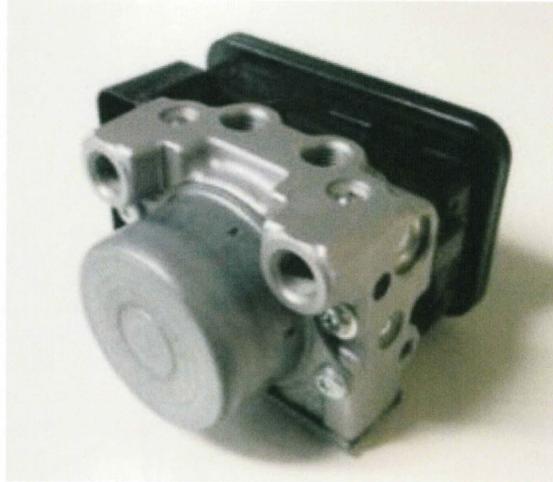
The approximate percentage of defective products among all the recalled models manufactured by NK at Ueda facility during the period between June 18, 2012 and March 22, 2013 is unknown .

The above mentioned period subject to recall is between the initial date of production of the products at issue and the date that NK completed Counter Measure No. 2 explained in Section 7 below.

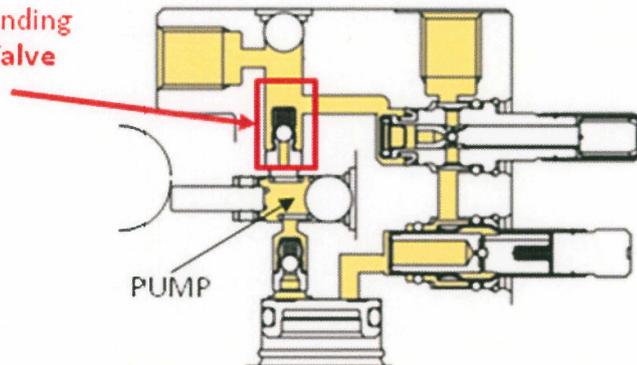
5. A description of the defect : 573.6 (C)(5)

If an aluminum filing were generated during production at NK and remained inside the product, it could potentially grind the seal part of the outlet check valve when the ABS is operated, causing the functional capability of the seal to be lost and the ABS functional capability to be lost. There could be friction between the body and check valve due to misaligned press fitting of the check valve, due to which the body end-face could break, and an aluminum filing could be generated. An aluminum filing remaining inside the product could be carried along by the brake fluid filling process, a process in the assembly of the complete vehicle, and could be ground into the outlet check valve. In addition, the aluminum filing could potentially have ground into the outlet check valve during ABS operation in the

market. If the seal of the outlet check valve became defective, the pump pressure could not rise when the ABS is activated, the functional capability during ABS operation could be lost, and there could be a risk of the vehicle bearing becoming unstable.



Location of defect  
Aluminum filing grinding  
Outlet check Valve



6. A chronology of events : 573.6 (C)(6)

Date	Event
December 14, 2012	A report was received by NK of a defect occurring in a customer (Triumph) completed vehicle process.
December 21, 2012	The above mentioned defective product (ABS Modulator) arrived at NK from the customer (Triumph).
December 27, 2012	The abnormal properties of the actual part that experienced the occurrence and the seal defect of the check valve outlet seal part were discovered.
January 28, 2013	Countermeasure 1: Tightening jig affixing bolt.



March 22, 2013	Countermeasure 2: Increase sensitivity of seat sensor of the body affixed jig.
April to July 2013	NK submitted analysis reports to each of four customers and had joint analysis with each of four customers to determine whether the defect was safety related or not.
April 24, 2013	A report was received by NK of a defect occurring in the customer (Kawasaki)'s complete vehicle inspection process.
May 9, 2013	The above mentioned defective product (ABS Modulator) arrived at NK from the customer (Kawasaki).
May 9, 2013	The abnormal properties of the actual part that experienced the occurrence and the seal defect of the check valve outlet seal part were discovered again.
July 4, 2013	NK determined that the main cause of the above defect was insufficient sensitivity of the seat sensor of the body affixing jig. NK confirmed that this problem was already addressed and corrected on March 22, 2013.
July 8, 2013	Receipt of notice of safety recall from customer (Honda).
July 8, 2013	NK made determination that there was a reportable defect and to do safety recall.

There has been no third party report of this defect nor of any motorcycle accident happening as a result of this manufacturing defect, and thus no reports of any injuries.

7. A description of the manufacturer's program for remedying the defect or noncompliance : 573.6 (C)(8)

As a remedy in the market, NK is working with its customers to develop a notification process for their customers. Meanwhile, NK took the following counter measures to the defect.

January 23, 2013 – Countermeasure 1: Tightening jig affixing bolt.

March 22, 2013 – Countermeasure 2: Increase sensitivity of seat sensor of the body affixed jig.

8. Representative copy of all notices and bulletins : 573.6 (C)(10)

A copy of all notices and bulletins will be provided to NHTSA when they become available.

9. Manufacturer's campaign number : 573.6 (C)(11)

Nissin Kogyo has not yet issued a campaign number.

Please address any procedural questions through our legal counsel Porter Wright Morris & Arthur's Washington DC office to the attention of Mr. Les Glick ([lglick@porterwright.com](mailto:lglick@porterwright.com)), 202-778-3022.

Sincerely,



Nissin Kogyo Co., Ltd.

*Kazuya Sato.*

Kazuya Sato

Director and Chief Quality Officer