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By Recall Management division at 9:01 am, Feb 03, 2014

13E-051
(7 pages) Amended

Safety Defect and Noncompliance Report Guide for *Equipment*

PART 573 Defect and Noncompliance Report

Date: January, 31, 2014

This report serves as Maxzone Auto Parts Corp. 's notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a noncompliance with Federal Motor Vehicle Safety Standard No. 108 exists in certain items of motor vehicle equipment listed below. Depo Auto Parts Ind. Co., Ltd. decided that this noncompliance with Federal Motor Vehicle Safety Standard No. 108 existed in these vehicles on those lot numbers and parts detail list as attached 1.

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

Manufacturer's corporate name:

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

Designated Agent (imported equipment):

DEPO Auto Parts Ind. Co., Ltd.

DEPO brand

Maxzone Auto Parts Corp.

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

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):

Not applicable

Name, address, email, and phone and fax numbers for the person(s) to whom inquiries about this report should be directed:

Mr. Bill Horn, DEPO Auto Parts Ind. Co. ltd.

No. 20-3 Nanshih Lane, Lukang Township, Changhua County 505, Taiwan

Tel: 011-886-4-772-2311 ext 1801 Fax: 011-886-4-771-0725

E-mail: billhorn@depoautolamp.com

Manufacturer's assigned campaign number (where applicable):?

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): Headlamp
Part/Model number:K30-1122R-AC Ford F150 Pickup, 04-08 w/Chrome Trim
Size and function (where applicable): Replacement Headlamp Right Side
Inclusive dates of manufacture (month and year): January 6, 2012 and October 30, 2012
Other information necessary to describe this equipment:
Total number of these items of equipment: 580

Type of equipment (e.g., tire, child restraint, headlamp): Headlamp
Part/Model number:K30-1122R-AC2 / K30-1122L-AC2 Ford F150 Pickup, 06-08
Size and function (where applicable): Replacement Headlamp Right Side / Left Side
Inclusive dates of manufacture (month and year): September 14, 2011
Other information necessary to describe this equipment:
Total number of these items of equipment:380

Type of equipment (e.g., tire, child restraint, headlamp): Headlamp
Part/Model number: K30-1122R-AC6 / K30-1122L-AC6 Ford F150 Pickup, 07-08
Size and function (where applicable): Replacement Headlamp Right Side / Left Side
Inclusive dates of manufacture (month and year): July 29, 2011
Other information necessary to describe this equipment:
Total number of these items of equipment:740

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: 1,700

The percentage of the recall population you estimate actually contain the defect or noncompliance:
0.4%

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):

The investigating results indicate that some samples derived from the market by CAPA/Intertek have failed to pass the FMVSS108 S8.7 Humidity test. DEPO has received some samples from Maxzone's stock and has also performed the same FMVSS108 S8.7 Humidity test on them. All the test results have passed the requirements, which was approved by Intertek Taiwan. See the attachment 1. We have inspected and verified the products in stock, and they all met the requirements of FMVSS108 S8.7. We think the noncompliance case in the market happened occasionally, and it is not necessary to recall those headlamps. However, NHTSA still thinks the the headlamps might not illuminate the roadway as brightly as intended, and that will increase the risk of crash. Therefore, we decide to recall the following part numbers and lot numbers which have any possibility of failing the humidity test.

K30-1122R-AC (Lot no. 20120102 & 20121015) The quantity: 580 pcs
K30-1122L-AC2 (Lot no. 20100905) The quantity: 190 pcs
K30-1122R-AC2 (Lot no. 20100905) The quantity: 190 pcs
K30-1122L-AC6 (Lot no. 20110711) The quantity: 370 pcs
K30-1122R-AC6 (Lot no. 20110711) The quantity: 370 pcs

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

DEPO continues to periodically perform conformity of production test in the lab for different items, and the test results were all O.K.(example as the attachment 2) The third party CAPA/Intertek also keeps picking up products sample from the market to test and verify. We find all the other similar products can be proved to meet the FMVSS108 S8.7 Humidity test requirements.

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.

Some corner or partial area of the lens assembled on the headlamps happened to show thin moisture, but the lighting function is normal. For safety consideration, DEPO has performed photometric test on the headlamps with the problem stated above, and the photometric test results could pass the FMVSS108 S8.1 standard requirements, and it's proved to be optically safe. (Photometric test result as attachment 3)

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

In FMVSS108 S8.7 Humidity test, the headlamp was first placed in the condition of temperature of 100 +7/-0 degrees F (38 +4/-0 degrees C) with a relative humidity of no less than 90 percent for 72hrs. Then, it was moved to the chamber with the temperature of 73 +7/-0 degrees F (23 +4/-0 degrees C) with a relative humidity of 30 +10/-0 percent for one hour. Such transition from high humidity and high temperature environment to dryer and lower temperature chamber will naturally cause thin moisture in the corner of the headlamp occasionally.

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

From the terms of FMVSS108 S8.7 Humidity test regulation, " (f) After one hour, the headlamp is removed and inspected for moisture." The noncompliance headlamps might have thin moisture in the corner. However, the lighting functions were still normal and safe, and their photometric tests results all met the FMVSS108 S8.1 requirements.

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

The noncompliance case happened occasionally. There is no warning that may precede the noncompliance condition.

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.

No incident has been filed with either Maxzone or DEPO.

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

See the result of The FMVSS108 S8.7 Humidity Test on August 8, 2013 as attachment 4. DEPO has verified to lower down the humidity condition from no less than 90% to 70%, the FMVSS108 S8.7 Humidity test result on August 22, 2013 as the attachment 6. It showed the appearance was normal.

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.

Maxzone will issue a recall in which we will offer our customers to return the lamps for good DEPO lamps at no cost on them. For any costs to remedy the defect or noncompliance before receiving our notification, we will reimburse the cost. Please contact our RMA department. In the beginning of August, 2013, we did a series of humidity tests to our stock and made sure that they can pass the standards. We also built a series of criteria to ensure the stable production quality. We will also regularly do the humidity test to these products in the future.

Provide the estimated date(s) on which owner and purchaser notifications will be issued and the estimated date(s) for completion of those notifications.

The recall notifications for K30-1122R-AC (Lot No. 20120102 & 20121015), K30-1122L/R-AC2 (Lot No. 20110905) and K30-1122L/R-AC6 (Lot No. 20110711) for owners and purchasers will be sent out on 2/21/2014. It will take approximately 15 days to complete.

rovide the estimated date(s) on which dealer and distributor notifications will be issued and the estimated date(s) for completion of those notifications.

The recall notifications for K30-1122R-AC (Lot No. 20120102 & 20121015), K30-1122L/R-AC2 (Lot No. 20110905) and K30-1122L/R-AC6 (Lot No. 20110711) for distributors will be sent out on 2/7/2014. It will take approximately 15 days to complete.

Describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The CAPA serial number after correction on the Headlamp, that is the number later than 10.30.2012 for AC spec. / 09.14.2011 for AC2 spec. / 07.29.2011 for AC6 spec.

**********<u>IMPORTANT REMINDERS</u>**********

A <u>DRAFT</u> 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.