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(5 pages)

## Safety Defect and Noncompliance Report Guide for *Vehicles*

### PART 573 Defect and Noncompliance Report

Date: 2 July 2014

This report serves as SUTPHEN CORPORATION'S notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a noncompliance with Federal Motor Vehicle Safety Standards (FMVSS209) exists in certain Emergency Vehicles. SUTPHEN CORPORATION decided that this noncompliance existed in these vehicles in late 2013.

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

Manufacturer's corporate name : SUTPHEN CORPORATION

Vehicle brand or trademark name owner(s) (where applicable): MINITOWER

Designated Agent (imported vehicles): N/A

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):

Component : L9 Seat Belt Buckle

Manufacturer:

Indiana Mills and Manufacturing Inc. (IMMI)

18881 US 31 North

Westfield, IN 46074

Contact Person:

Lisa Hanson

Director of Corporate Quality

Email: lhanson@imminet.com

Phone: 317-867-8451

Fax: 317-896-2142

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

Nick Maddalena  
Sutphen Corporation  
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Manufacturer's assigned campaign number (where applicable): N/A

II. Identification of the Recall Population and Its Size

Make : SUTPHEN CORPORATION
Model : MINITOWER
Model Year(s) : 2013
Inclusive dates of manufacture (month and year) : Jan 2013
Body Style/Type (for non-passenger cars) : Single Axle Aerial Ladder Fire Truck
Other information necessary to describe these vehicles (e.g., VIN range, GVWR or class for trucks, displacement for motorcycles, and number of passengers for buses): SUTPHEN Serial Number HS-5148, Minitower, Wilmington, NC Fire Department
Total number of these vehicles: 1

Provide the following information as to all the groups of vehicles:

Grand total number of vehicles: 1

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

0%

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):

- Information was provided to Sutphen Corp by our seat belt supplier (IMMI) in November of 2013.

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

- The component in question is an IMMI 'L9' buckle used with Rollover airbag equipped trucks. Per the data provided (by IMMI) to Sutphen, IMMI have shipped three 'Sutphen' versions of these buckles. Two of these buckles never left our Chassis plant and are being returned to IMMI, the third was sent by IMMI to a repair shop to be used as a replacement part on a single truck (mentioned above). Therefore, other than the single vehicle mentioned above, there are no other possible instances of a Sutphen Vehicle with his non-compliant part.

### 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.

- On November 1, 2013 Indiana Mills and Manufacturing Inc. ("IMMI") determined that a potential noncompliance with Federal Motor Vehicle Safety Standard (FMVSS) 209 exists in certain seat belt assemblies that are equipped with L9 seat belt buckles. These seat belt assemblies were sold to numerous customers as items of original equipment. IMMI is furnishing this notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573, Defect and Noncompliance Responsibility and Reports. IMMI's investigation is ongoing.
- Certain IMMI seat belt assemblies equipped with L9 buckles do not satisfy the requirements of S4.3 (g) of FMVSS 209. When the push button on the buckle is pressed to release the latch plate for egress, the latch plate can become partially engaged with the buckle. Under this circumstance, the partially engaged latch plate may not separate from the buckle when a force of 22N is applied.

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

- The root cause of the noncompliance is associated with the locking pawl (part number 916030) inside the L9 buckle. Some locking pawls from specific manufacturing lots were produced with an excessively large burr. The burr on the locking pawl can catch the edge of the latch plate when the button is pressed to unlatch the buckle, causing a partial engagement condition.

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

- When releasing the seatbelt, an occupant would have to depress the release push button with more force than normal (per IMMI, in excess of 22N). Note : there is a very low probability of the latch plate failing to disengage.

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

- N/A

*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.

- N/A

*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.

- Beginning on October 16, 2013, IMMI Quality Assurance and Engineering personnel tested and measured the returned buckles as well as other buckles on-hand. The results of those tests indicated that each returned buckle latched completely when the latch plate was inserted. When the push button on the buckle is pressed to release the latch while the latch plate has some lateral force applied to it, the latch plate can become partially engaged with the buckle. To better assess the issue, IMMI developed a new test fixture to apply lateral forces to the latch plate during the evaluation of partial engagement.
- IMMI found that some of the returned L9 buckles could be placed into a partial engagement condition using this test fixture, and that the latch plate would not separate when a 22N force was applied.

#### 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.

- Sutphen Corporation Service Department will inspect the buckle to determine whether or not it is among the batch as indicated by the date codes provided by IMMI. If it is not within the range of date codes the buckle is considered compliant and no further action will be taken. If the buckle is within the date codes, Sutphen Service Department will remove and replace the defective L9 buckle.

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

- Pending approval by NHTSA of our draft letter to the affected customer we would like to send the letter out as soon as possible (estimate 11 July 2014). If replacement is necessary we estimate that this will take not more than one business day.

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

- See above.

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

- The replacement component will not be visually different. It will have a different date code and lot number than the non-compliant components as provided by the manufacturer, IMMI.