



Brake Parts INC LLC  
4400 Prime Parkway  
McHenry, IL 60050

**RECEIVED**  
By Recall Management Division at 8:57 am, Jul 03, 2014

14E-036  
(10 pages) Amended

**Amended PART 573 Defect and Noncompliance Report**

Date: July 10, 2014

This report serves as Brake Parts Inc LLC’s (“BPI”) notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a defect related to motor vehicle safety exists in certain of its brake shoes. BPI determined that this defect existed in these vehicles on July 1, 2014. BPI submitted a Part 573 Defect and Noncompliance Report on July 2, 2014. BPI submits this Amended Part 573 Defect and Noncompliance Report, which expands the relevant manufacture dates for the parts at issue and also discloses an additional customer complaint, which BPI received on July 9, 2014, as detailed below.

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

Manufacturer’s corporate name: Brake Parts Inc

Equipment’s brand or trademark name owner(s) (where applicable): Raybestos, AC Delco DuraStop, AC Delco Advantage, CARQUEST, Federated.

Designated Agent (imported equipment):

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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:

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):

The manufacturer of the brake shoes at issue is Dongying Xingi Automobile Fitting Co., Ltd.,

Dawang Economic Automobile Fitting Co. Ltd., Dawang Economic Development Zone,

Dongying Shangdong Province, 257335 People’s Republic of China; Phone Number : Tel.

#0086-546-6080661



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

Mr. Terry Heffelfinger, Vice President, Product Development, R & D, & Quality, Brake Parts Inc

LLC, Global Brake, 4400 Prime Parkway, McHenry, Illinois 60050;

terry.heffelfinger@BrakePartsInc.com, phone 815.759.7538

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.

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| Type of equipment (e.g., tire, child restraint, headlamp): Brake Shoe  |
| Part/Model number: S855 Base Part Number   |
| Derivative part numbers include: Raybestos 855PG, 855SG; AC Delco 17855B, 14855B, B855L; CARQUEST & Federated BS855  |
| Size and function (where applicable): – 11.68” x 2.43” brake shoe for drum brake applications  |
| Inclusive dates of manufacture (month and year): April 1, 2013 to April 19, 2014   |
| Other information necessary to describe this equipment: replacement rear brake shoes for the following vehicles—Chevrolet Truck: Silverado 1500 (2005-2009), Silverado Classic 1500 (2007); GMC Truck: Sierra 1500 (2005-2009), Sierra Classic 1500 (2007) |
| Total number of these items of equipment: S855 – 53,760 Estimated Field Inventory  |

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| Type of equipment (e.g., tire, child restraint, headlamp): Brake Shoe                         |
| Part/Model number: S960 Base Part Number  |
| Derivative part numbers include: Raybestos 960PG, AC Delco 17960B, CARQUEST & Federated BS960 |
| Size and function (where applicable): – 11.62” x 2.39” brake shoe for drum brake applications |
| Inclusive dates of manufacture (month and year): April 1, 2013 to April 19, 2014              |
| Other information necessary to describe this equipment: replacement rear brake shoes for the  |



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| following vehicles—Chevrolet Truck: Silverado 1500 (2008-2013); GMC Truck: Sierra 1500 (2008-2013) |
| Total number of these items of equipment: S960B – 56,772 Estimated Field Inventory                 |

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| Type of equipment (e.g., tire, child restraint, headlamp): Brake Shoe  |
| Part/Model number: S815 Base Part Number   |
| Derivative part numbers include: Raybestos 815PG, 815SG; AC Delco 17815B, 14815B, B815L; CARQUEST & Federated BS815  |
| Size and function (where applicable): – 11.66” x 1.85”brake shoe for drum brake applications   |
| Inclusive dates of manufacture (month and year): April 1, 2013 to April 19, 2014   |
| Other information necessary to describe this equipment: replacement rear brake shoes for the following vehicles—Chevrolet Truck: Colorado (2004-2008); GMC Truck: Canyon (2004-2008); Isuzu Truck: I-280 (2006), I-290(2007-2008), I-350(2006), I-370(2007-2008) |
| Total number of these items of equipment: S815B –17,856 Estimated Field Inventory  |

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| Type of equipment (e.g., tire, child restraint, headlamp): Brake Shoe  |
| Part/Model number: S589 Base Part Number   |
| Derivative part numbers include: Raybestos 589PG, 589SG; AC Delco 17589B, 14589B, 589SG  |
| Size and function (where applicable): - 11.61” x 2”brake shoe for drum brake applications  |
| Inclusive dates of manufacture (month and year): April 1, 2013 to April 19, 2014   |
| Other information necessary to describe this equipment: replacement rear brake shoes for the following vehicles—Toyota Truck: 4 Runner (1987-2000), Pickup (1987-1995), T100 (1993-1998), Tacoma (1995-2002), Tundra (2000-2002) |
| Total number of these items of equipment: S589B – 3,180 Estimated Field Inventory  |

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: 131,568



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

BPI is uncertain at this time of the percentage of the recall population that actually contains the defect, but is currently conducting further internal testing that will assist in estimating the percentage. Based on testing of the parts at issue that BPI has conducted to-date, BPI estimates that the percentage of the recall population that actually contains the defect is likely higher in parts manufactured from December 2013 through March 2014, as compared to the remainder of the recall population.

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):

BPI determined the recall population based on (1) the ten reported field failures to-date; (2) root cause identification by the supplier of inadequate adhesive curing process; and (3) adhesive shear and other internal tests BPI has performed in-house. BPI's internal testing to-date shows that the defect in the parts at issue appears to be present in at least some parts manufactured between April 2013 and early April 2014, which informed BPI's determination as to the inclusive dates of manufacture. BPI has conducted internal testing on the parts at issue with date codes on April 20, 2014 and after, which indicate that the defect is not present in those parts. According to the supplier, Xinyi, the adhesive curing process was improved by at least April 20, 2014. BPI's internal testing of the four parts listed above, and other parts, manufactured by Xinyi is ongoing.

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

Similar items of equipment that are not subject to this notification include brake shoe parts with identical part numbers as those at issue in the notification but which were manufactured on dates



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outside of the range identified in this notification (i.e., April 1, 2013 – April 19, 2014).

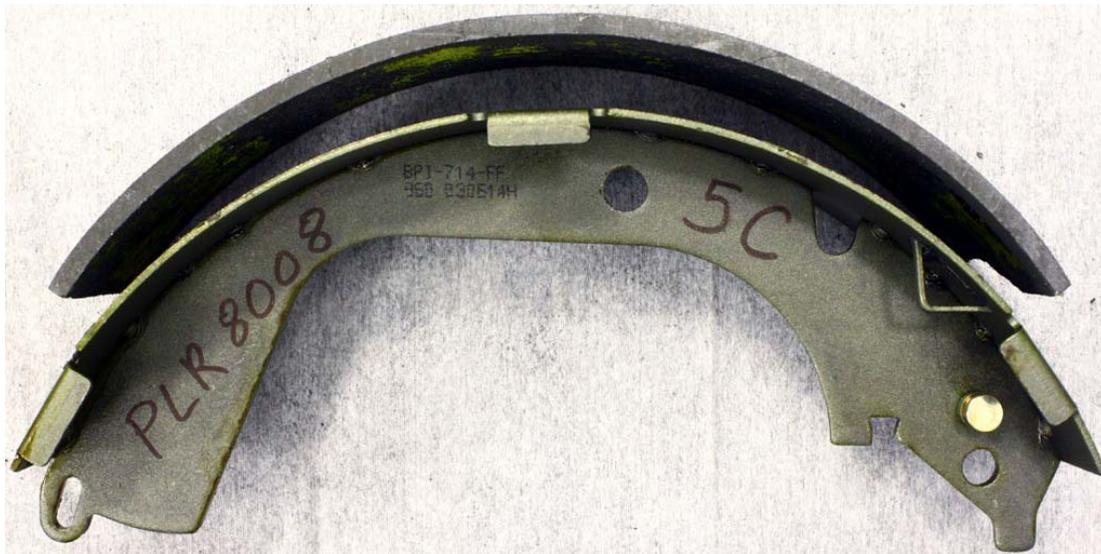
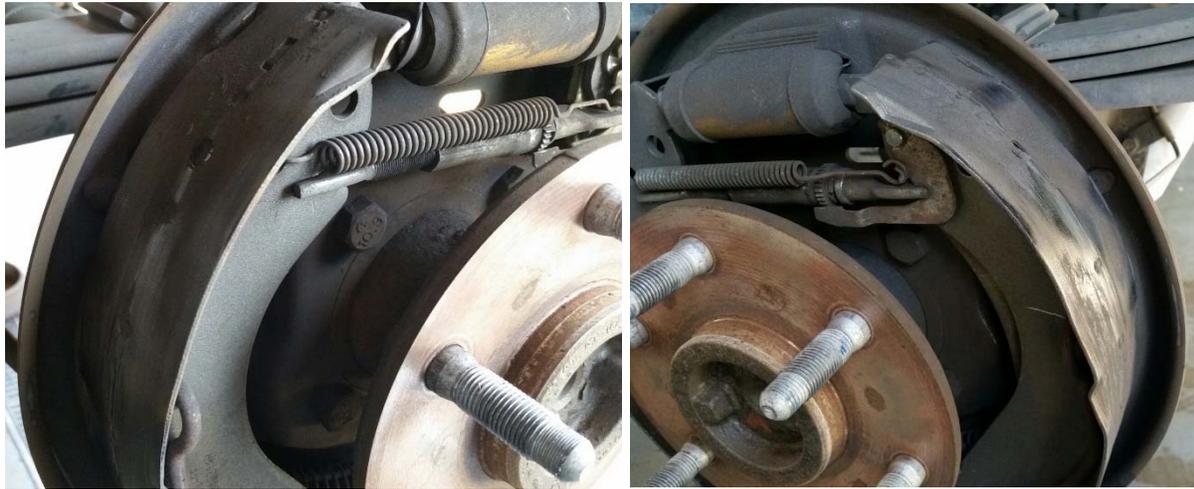
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### III. Description of the Defect or Noncompliance and Chronology of Events

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.

The defect involves the adhesion between the friction lining and the steel shoe. The lining of the brake shoe may detach from the steel shoe during normal service, causing the affected brake to fail. The defect does not affect the other brakes on the vehicle, and those brakes will continue to operate normally. If the lining detaches from the steel shoe, it will reduce the available braking force which could lengthen the required stopping distance, and increase the risk of a crash without prior warning. Photos are attached. The first two photos show brake assemblies in which the friction lining has detached from the steel shoe. The third photo shows one of the brake shoe parts at issue in this notification. As is apparent from the photo, the friction lining is detached in the photo and appears above the steel shoe. The last photo shows a steel shoe that has retained lining material and glue after detachment of the lining.

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

The adhesive between the lining and the steel shoe was not sufficiently bonded due to an inadequate curing process.

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

The brake lining which is adhesively bonded to the shoe steel may detach from the steel and not provide expected braking or may become lodged in the rear drum brake mechanism, causing the brake at issue to malfunction.

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

When friction lining detaches, it is possible that the brake may make a popping noise and/or a metal-to-metal grinding sound.

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*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.*

On April 30, 2014, BPI received notice of three customer complaints regarding brake shoe



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linings detaching from the brake shoe steel on two different vehicle applications and part numbers 17855B and 17960B. The parts at issue were from a dealership in Santa Paula, California. Specifically, the customer relayed that it was aware of three incidents in which it appeared that the lining on BPI's brake shoes (part 17855B) and (part 17860B) detached from the steel shoe. No accidents or injuries were reported, but the vehicles at issue were not drivable as a result of the defect. After acquiring parts identified in the April 30 complaint, BPI began testing the parts internally to learn more information. BPI also began testing parts from inventory in order to assess whether the incident was isolated. On May 22, 2014, BPI received notice of a field report that the lining had detached from the steel shoe on part 855SG, as reported by a Raybestos District Sales Manager. BPI continued running internal tests and also began investigating the issue with the manufacturer of the brake shoes at issue, Dongying Xinyi Automobile Fitting Co., Ltd ("Xinyi"). On May 26, 2014, BPI received notice of two incidents that occurred in or around May 2014 in which the lining detached from the steel shoe in part number 17960B. No accidents or injuries were reported. On May 28, 2014, BPI received notice of an incident involving Part No. 14855B, where the lining detached from the steel shoe. Again, no injuries or accidents were reported. Throughout June, BPI continued to conduct additional testing and continued to gather information and investigate the issue, including the potential scope, severity, and cause, with Xinyi. BPI called for an in-person meeting with Xinyi to discuss the issue, which was scheduled for June 26, 2014. On June 24, 2014, BPI received notice of two more incidents in which the lining detached from the steel shoe in part numbers 17855B and 17960B. No injuries or accidents were reported. On June 26, 2014, representatives from BPI met in-person with one of Xinyi's employees in McHenry, Illinois, during which meeting BPI



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discussed the issue at length with Xinyi. On June 29, 2014, Xinyi provided responses to questions that BPI had asked in connection with the June 26 meeting. Two days later, on July 1, 2014, BPI's senior administrative team met and determined that the parts identified above contain a defect that is related to motor vehicle safety. On July 2, 2014, BPI submitted a Part 573 Defect and Noncompliance Report to NHTSA. On July 9, 2014, BPI received notice of an incident that occurred on June 28, 2014 in which the lining detached from the steel shoe in part number 855SG, which caused the brake to lock up. No injuries or accidents were reported.

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*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.*

N/A

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#### 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.

BPI will replace the recalled brake shoes free of charge. If owners or purchasers have incurred costs to remedy the defect before receiving BPI's notification concerning the defect, they may submit a request for reimbursement to BPI and receive full reimbursement for their costs.

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

BPI will provide a letter to its distributors to send to their customers (including owners and purchasers) by approximately July 18, 2014. BPI will request that its customers send the owner



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and purchaser notifications as soon as possible, but no later than July 31, 2014.

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

At this time, BPI anticipates issuing the dealer and distributor notifications by approximately July 18, 2014.

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

In the remedied parts, the lining in the replacement brake shoes will be adequately bonded with the steel shoe such that the lining will not detach from the steel shoe under normal service conditions. BPI has received assurances from its supplier, Xinyi, that it has taken steps to remedy the insufficiencies in the curing process and that remedied parts will conform to BPI's standards. Additionally, BPI is and will continue to conduct internal testing to ensure that the defect does not exist in the remedy parts. The remedy parts will be identifiable by date codes.

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Regards,

Terry Heffelfinger  
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