

Chronology of Defect / Noncompliance Determination**573.6 (c) (6) (7)**

The N-Diesel vehicles are shipped from Japan to the United States. The vehicles have two steer tires on the front axle and four drive tires on the rear axle. During transport, the rear outer wheels are mounted to the chassis of the vehicle. In normal operation, the wheels are then installed on the rear axle once the truck is wholesaled and as it is otherwise being prepared for delivery to a bodybuilder or dealer. The rear wheel lug nuts are tightened, torqued and marked (with a marker). Before being released, the vehicles undergo a final quality control inspection. Trucks that have not yet been wholesaled will receive periodic maintenance. In April, 2019, due to high demand, staff at the Baltimore port began to install the rear wheels on some of the vehicles during maintenance rather than during the pre-delivery process in order to reduce the burden on the installation staff. In addition, temporary staff was added to the Baltimore port beginning in late April, 2019.

On October 15, 2019, Isuzu received a report indicating that 2 outer wheel lug nuts were found loose and were backing away from the wheel on a vehicle with about 100 miles of use. Isuzu immediately reviewed warranty claims and identified three pertinent claims indicating that 1-3 lug nuts were found to be missing. The affected vehicles had repair order dates between June 11 and September 16, 2019, and mileages between 72-8793 miles at the time of the repair. Each of the vehicles had been processed through the Baltimore port. Two of the warranty claims involved vehicles that had been processed in early April, 2019. While Isuzu will periodically receive isolated reports about lug nuts, the last such report or claim had been received in May, 2018, suggesting that this issue began in early April, 2019.

A containment hold was initiated at the Baltimore port on October 17, 2019. That same day, Isuzu conducted an audit of 61 vehicles that were at the Baltimore port which were being prepared for shipping and found 17 with either loose or under-torqued lug nuts. Each of those 61 vehicles was reworked (every lug nut was torqued to spec) and released. For all newly processed (or to be processed) vehicles the hold remained in place until an additional torque wrench arrived at the Baltimore port and new measures were implemented on October 22, 2019 to improve quality control.

Isuzu processed the issue through its internal investigation process, and on November 13, 2019 decided to conduct a safety recall in the field to inspect the outer rear wheel lug nuts on potentially affected vehicles processed through the Baltimore port starting between April 1, 2019 and October 17, 2019 and to tighten and properly torque the lug nuts if necessary.