

**BYD Coach & Bus**  
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Lancaster, CA 93534  
Attn: Xin Li (Eva)

**Michaela Oberbauer, GM**  
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August 11, 2020

**RE: Recall of Non-Compliant Kiel Rear Cross Seats**  
**NHTSA ID: 20E054**

Dear Ms. Li,

Following is information about an issue with Kiel Rear Cross coach seats. At this time, there is no action necessary on the part of BYD. This recall is expected to be closed within the next two months. Updates will be sent as information becomes available.

**Description of issue:**

Mounting location of belt retractor on rear cross chassis is reducing length of webbing required for switching back from ALR (Automatic Locking Retractor – used for securing a child seat) to ELR (Emergency Locking Retractor – allows the seat belt to freely extend and retract with occupant movement, yet locks the belt during a sudden stop or upon impact) mode on Schnierle belt after activation. ALR is activated by pulling the belt all the way out. ALR is deactivated by unbuckling the belt and allowing it to retract fully. Amount of webbing necessary for deactivation is very close to the switching tolerance of belt.

**History:**

07/15/2020 Kiel NA was notified that a seat belt on a rear cross seat was not functioning properly.

07/28/2020 Seat was inspected at Kiel NA.

07/28/20-07/31/20 Root cause analysis identified design issue. Mounting location of belt retractor on rear cross chassis is reducing length of webbing required for switching back from ALR to ELR mode on Schnierle belt after activation.

07/31/2020 - Current – Development of retrofit and long-term solution for relocating mounting location of belt retractor.

**NHTSA Reporting:**

A NHTSA Equipment Report has been filed on this topic effective 08/10/2020. Please see attachment #1.

**Root Cause:**

Mounting location of belt retractor on rear cross chassis is reducing length of webbing required for switching back from ALR to ELR mode on Schnierle belt after activation. Amount of webbing necessary for deactivation is very close to the switching tolerance of belt.

**Immediate Corrective Action:**

All rear cross seats containing impacted chassis will have a modification installed. This modification will relocate the belt retractor on rear cross chassis allowing the additional webbing needed for switching back to ELR mode.

This modification will be completed at Kiel expense. ***Please provide locations for the coaches impacted so that a schedule for completion can be organized.***

**Impact:**

Following BYD coaches are impacted:

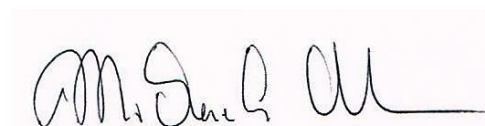
Kiel PN		Units	Project	Series	Customer PO	Ship Date
BYD12674145		1/5	BYD - Broward County	AV2025	8300020106	1/7/2020
BYD12674145		2/5	BYD - Broward County	AV2025	8300020106	1/7/2020
BYD12674145		3/5	BYD - Broward County	AV2025	8300020106	1/7/2020
BYD12674145		4/5	BYD - Broward County	AV2025	8300020106	1/7/2020
BYD12674145		5/5	BYD - Broward County	AV2025	8300020106	1/7/2020

**Long Term Corrective Action:**

Modified rear cross chassis mounting location for belt retractor will be implemented prior to any further production.

Please contact us if you have any questions or need further information.

With best regards,  
Kiel N.A., L.L.C.



Michaela Oberbauer  
General Manager



Sharon Bachtel  
QA Manager

Attachment 1: NHTSA Equipment Report