



U.S. Department of Transportation  
**National Highway Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

May 10, 2023

Mr. Joseph Ruscak  
Attorney  
Continental Automotive Systems, Inc.  
703 S Cleveland Massillon Road  
Fairlawn, OH 44333

NEF-107KL  
23E-037

**Subject:** Damaged Electric Brake System Module

Dear Mr. Ruscak:

This letter serves to acknowledge Continental Automotive Systems, Inc.'s notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**

CONTINENTAL AUTOMOTIVE/EBS MODULE MK100/9999

**Mfr's Report Date:** May 4, 2023

**NHTSA Campaign Number:** 23E-037

**Components:**

SERVICE BRAKES, HYDRAULIC:ANTILOCK/TRACTION CONTROL/ELECTRONIC LIMITED  
SLIP:CONTROL UNIT/MODULE

**Potential Number of Units Affected:** 1,420

**Problem Description:**

Continental Automotive Systems, Inc. (Continental Automotive) is recalling certain Electric Brake System (EBS) modules, with model number MK100. Valves inside the Electric Brake System module may have been damaged during manufacturing, causing an internal brake module leak.

**Consequence:**

A leak inside the brake module can cause an unexpected increase in brake pedal travel or unexpected movement during an Auto Hold event, increasing the risk of a crash.

**Remedy:**

The remedy program will be determined by the vehicle manufacturers and provided free of charge. The manufacturer has not yet provided a schedule for recall notification. Owners may contact their respective vehicle manufacturers.

**Notes:**

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to [www.nhtsa.gov](http://www.nhtsa.gov).



**Please ensure the following requirements are met:**

Per the requirements of 49 USC 30119, please provide the part number, name and description of the component or components involved in this recall. This information should be provided in an amended 573 in the "Involved Components" section.

**AMENDED 573 REQUIRED.**

A description of the manufacturer's program for remedying the defect or noncompliance (49 CFR 573.6 (c)(8)(i)).

**AMENDED 573 REQUIRED.**

Based on the provided remedy plan, it appears that your company may not be able to provide the required recall completion rate quarterly reports. If another company intends to file the report with detailed information about your company's remedy counts, please state so in the remedy section of the 573.

**AMENDED 573 REQUIRED.**

Your company must supply the estimated date(s) for which it will notify dealers and/or distributors regarding this safety recall. If your company subsequently becomes aware that either the beginning or the completion dates reported to the agency for any of the notifications will be delayed by more than two weeks, your company shall promptly advise the agency of the delay and the reasons therefor, and furnish a revised estimate. If your company does not have dealers or distributors, please state so in the 573 (49 CFR 573.6 (c)(8)(ii)).

**AMENDED 573 REQUIRED.**

Please be reminded of the following requirements:

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

Please be reminded that under 49 U.S.C. § 30112(a)(3), it is illegal for a manufacturer, to sell, offer for sale, import, or introduce or deliver into interstate commerce, a motor vehicle or item of motor vehicle equipment that contains a safety defect once the manufacturer has notified NHTSA about that safety defect. This prohibition does not apply once the motor vehicle or motor vehicle equipment has been remedied according to the manufacturer's instructions.

As stated in 49 U.S.C. § 30118(f), submission of eight consecutive quarterly reports followed by three annual reports is required. As described in 573.7, submission of the first of eight consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter. The first of three consecutive annual status reports will be due on, or before, 1 year after the eighth quarterly report was submitted.

Continental Automotive Systems, Inc.'s contact for this recall will be Kristin Lepper who may be reached by email at kristin.lepper@dot.gov. We look forward to working with you.

Sincerely,

A handwritten signature in black ink that reads "Alex Ansley". The signature is fluid and cursive, with a checkmark-like flourish at the end.

Alex Ansley  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement