



## **PILKINGTON NORTH AMERICA, INC. PART 573 DEFECT REPORT**

January 14, 2016

This report serves as Pilkington North America, Inc.'s ("PNA's") notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a defect related to motor vehicle safety exists in the bracket mounted on the inside of a small number of replacement windshields. These replacement windshields are used in the Mazda CX-5. On a small number of parts, a bracket installed on the inside of the windshield may have been affixed improperly. This bracket is used to hold a separate laser sensor or LIDAR device that is linked to the vehicle's Smart City Brake Support System. On or about January 8, 2016, PNA decided that there was a defect in the bracket or, more specifically, in the method used to affix the bracket to the inside of the windshield.

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

Manufacturer's corporate name: **LN Safety Glass S.A de C.V.**

Equipment's brand or trademark name owner(s) (where applicable): **Pilkington North America, Inc. ("PNA")**

Designated Agent (imported equipment): **Some of these windshields were imported by LN of America Inc. or PNA.**

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): **N/A**


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

**Gerald S. Kingsley**  
**Director, Quality – North America**  
**Pilkington North America, Inc.**  
**2401 East Broadway**  
**Northwood, Ohio 43619**  
**Tel: (419).247-4255**  
**Fax: (419) 247-4743**  
**Email: [Gerald.Kingsley@nsg.com](mailto:Gerald.Kingsley@nsg.com)**

Manufacturer's assigned campaign number (where applicable): **PNA has not assigned a number to this recall.**

## 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.

Type of equipment (e.g., tire, child restraint, headlamp): <b>Bracket installed inside replacement windshield; bracket used to support separate radar sensor or LIDAR device</b>
Part/Model number: <b>FW04026 GTY (NAGS Identifier)</b>
Size and function (where applicable): <b>The bracket was installed on replacement front windshields made as replacement parts for the Mazda CX-5</b>
Inclusive dates of manufacture (month and year): <b>These brackets were installed on windshields manufactured on particular days in November and December of 2015.</b>
Other information necessary to describe this equipment: <b>These replacement windshields are used only on the Mazda CX-5. Each windshield has a monogram with the Pilkington name and the phrase "EZ-Kool Plus." The DOT number is 177. The month code is "C" for November or "V" for December; and the year code is "Y" for 2015. A copy of the monogram for the November production days is shown below:</b>  
Total number of these items of equipment: <b>Approximately 501 units were shipped from the Mexicali plant during the affected time period. A total of 250 units were shipped to PNA's distribution centers in Columbus and Phoenix. Of these 250 units, 52 have already been recovered from inventory, leaving 198 units unaccounted for at this time. The remaining 251 units were shipped to a customer's distribution centers in Ontario, California and Braselton, Georgia. Of these 251 units, 144 have been located in the customer's inventory and either have been quarantined or have been identified as not being suitable for sale or distribution. Overall, out of 501 units shipped from the Mexicali plant, a total of 305 units have not yet been located. Some of these units may now be held by retailers, and some of these units may have been installed on vehicles. This population may shrink as PNA continues its efforts to locate the affected windshields in the inventory of distributors and retailers.</b>

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: **The Mexicali plant shipped 501 units to the U.S. with the November and December production dates. Of these 501 units, 196 units have already been located in PNA’s inventory or in the inventory of a large customer.**

The percentage of the recall population you estimate actually contain the defect or noncompliance: **100%. All of the units produced in November and December at the Mexicali plant contain the defect.**

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): **The recall population was determined by inspecting windshields produced during the months in question. The recalled windshields all have brackets affixed solely by tape instead of being affixed by urethane plus tape. Quality control staff are able to identify the affected brackets by exerting pressure on the brackets and by visual inspection. These windshields were produced on particular days during the first two months of production for this windshield at the Mexicali plant.**

Describe how the recall population is different from any similar items of equipment not subject to this notification: **The recall population has the DOT number of 177 (referring to the Mexicali plant). These windshields have the part number FW 4026. These windshields also have production date codes of either “C Y” or “V Y.” The affected windshields all have visible monograms with the “C Y” or “V Y” date codes.**

### **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 relates to the method used to affix the bracket installed on the inside of the windshield. The affected brackets were installed only with tape rather than with urethane and tape. As a result, they could be loosened from the windshield by exerting force on the bracket.**

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

**The brackets were affixed with tape instead of urethane plus tape.**

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

**Potentially, the bracket could detach from the windshield if force is applied to the bracket. Since the bracket holds the laser sensor or LIDAR device, this could potentially affect the functionality of the vehicle’s Smart City Brake Support System.**

**PNA has attached to this Part 573 Report pages 21 and 22 from the Mazda CX-5 Smart Start Guide. These two pages describe the Smart City Brake Support System. This System utilizes a laser sensor placed in the bracket inside the front windshield and a radar sensor located near the headlights. This System provides driver alerts and automatic braking when the vehicle is operating at low speeds and encounters certain conditions.**

PNA does not manufacture or provide the laser sensor. PNA produces the windshield with the bracket affixed on the inside of the glass. When a windshield is replaced, the service provider either reuses the existing sensor or purchases a replacement sensor from another supplier. Either way, the laser sensor typically would be placed inside the bracket at the time the windshield is replaced.

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

It is uncertain whether any warning signs would exist. Potentially, the driver or passengers might detect movement or shaking of the bracket.

*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.

As of this date, there have been no crashes, injuries, or fatalities involving this bracket. Nor have there been any warranty claims. PNA first learned of a potential defect earlier this month. Specifically, on January 4, 2016, PNA received an unverified report from a customer that is a retailer in South Carolina. That retailer reported that the bracket had not been installed properly and could easily be separated from the windshield.

Over the next several days, PNA retrieved and inspected inventory of the product. This inspection indicated that the customer's report was correct. PNA's review also indicated that the bracket had been improperly affixed to windshields only during the isolated production days in November and December of 2015.

On January 8, 2016, PNA notified its largest customer and asked the customer to place a hold on this product and to cease all sales or distribution of the product. On the same date, PNA notified its internal distribution centers and gave instructions to cease all sales or distribution of this product.

On January 11, 2016, PNA located and inspected five additional units in its inventory. These units were manufactured during November or December, and the inspection revealed that the brackets were all installed only with tape and without the additional urethane that is required.

*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

#### 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.

PNA plans to contact all wholesalers and retailers known to have received this replacement windshield. PNA will offer to replace all affected windshields still in inventory. PNA will ask that all wholesalers and retailers destroy any product now in inventory. PNA will simultaneously work with

all wholesalers and retailers to develop a comprehensive list of end users. PNA will then contact the end users and instruct them to come in to a cooperating retailer for inspection and, if needed, replacement of the windshield. If any end users have incurred repair costs on their own to replace the affected windshield or the bracket, and if they are able to document such costs, PNA will reimburse the end users for any reasonable repair costs.

For NHTSA's review, PNA will provide to NHTSA drafts of all official correspondence relating to this recall. This will include drafts of all letters to PNA's direct customers and all letters to end users identified by PNA.

At the Mexicali plant, PNA has already taken steps to retrain or instruct employees on the proper installation procedures for these brackets. The plant will in the future produce windshields with the brackets affixed using urethane and tape, as required.

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

PNA plans to issue the owner and purchaser notifications within the next sixty (60) days if possible. The exact date will depend in part on the level of cooperation that is provided by wholesalers and retailers.

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

Informally, PNA has already contacted its largest customer and may informally contact any other retailers or wholesalers identified in the next week. PNA plans to issue the official dealer and distributor notifications in the next thirty (30) days or sooner, if possible.

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

The new windshields will have different production date codes. In addition, on the windshields being distributed now, the brackets will be firmly affixed with urethane and tape. On the windshields being recalled, the brackets were installed only with tape.

## **Exhibit A**

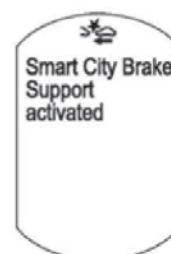
### **Excerpt From Mazda CX-5 Smart Start Guide**

# Smart City Brake Support

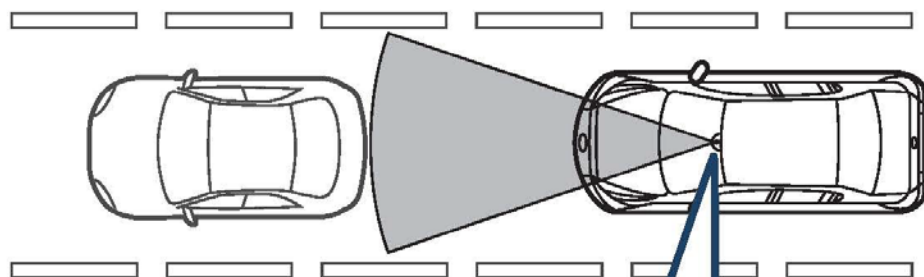
## SMART CITY BRAKE SUPPORT (SCBS) SYSTEM (if equipped)

**The Smart City Brake Support (SCBS) system is designed to reduce damage in the event of a collision by automatically applying the vehicle's braking system when the system's laser sensor detects an imminent collision with the vehicle ahead:**

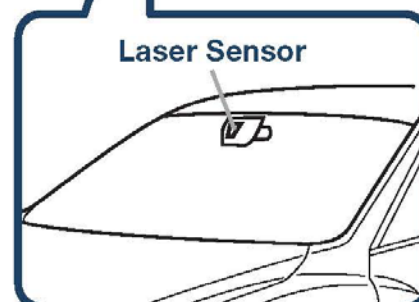
- When your vehicle speed is 2 to 18 mph (4 to 30 km/h).
- The system determines that a collision with a vehicle ahead is unavoidable.
- It may be possible to avoid a collision if the relative speed between your vehicle and the vehicle ahead is less than 12.5 mph (20 km/h).
- When the driver depresses the brake pedal while the system is in the operation range at about 2 to 18 mph (4 to 30 km/h), the brakes are applied firmly and quickly to assist. (SCBS Automatic Brake is displayed in the Multi-information Display)
- SCBS automatic brake is released approximately 2 seconds after the vehicle comes to a stop.



Refer to your Owner's Manual for complete details.



SCBS system can be turned off using TCS OFF button.



**WARNING:** SCBS is only a supplementary system to reduce damage in the event of a collision, however the SCBS has limitations. Do not rely solely on the SCBS. Always keep your eyes on the road.

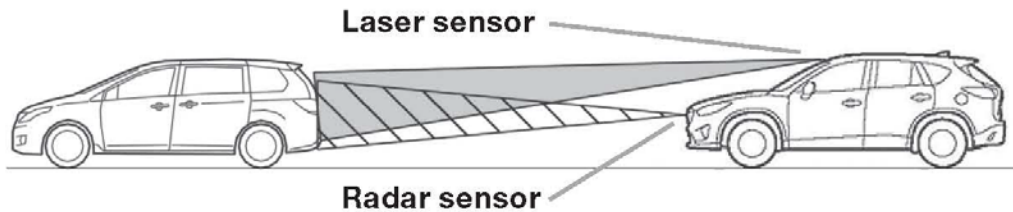


# Smart Brake Support

## SMART BRAKE SUPPORT (SBS) (if equipped)

*The Smart Brake Support (SBS) is a system which alerts the driver of a possible collision using an indicator and warning sound in the instrument cluster while the vehicle is being driven at about 10 mph (15 km/h) or faster and the system's radar sensor determines that your vehicle may hit a vehicle ahead. Furthermore, if the radar sensor determines that a collision is unavoidable, the automatic brake control is performed to reduce damage in the event of a collision. In addition, when the driver depresses the brake pedal, the brakes operate more quickly to assist the driver.*

Refer to your Owner's Manual for complete details.



SBS system can be turned off using TCS OFF button.



**WARNING:** SBS is only a supplementary system to reduce damage in the event of a collision, however the SBS has limitations. Do not rely solely on the SBS. Always keep your eyes on the road.

### Collision Warning

If there is the possibility of a collision with a vehicle ahead, the beep sounds continuously and a warning is indicated in the multi-information display.

