



EXECUTIVE SECRETARIAT
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Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
West Building
Washington, D.C. 20590

Date: May 23, 2018
Subject: Petition of Exemption for Inconsequential Noncompliance – 2018 Model Year
Vapor Bus – FMVSS 205 Laminated Glass Panes Marking

Dear Sir/Madam:

Consolidated Glass & Mirror, LLC (“CGM”), subsidiary of Guardian Glass, submits in accordance with 49 C.F.R. §556.4 the following information as its petition for exemption from the notification and remedy requirements of 49 U.S.C. §301, on the grounds that the noncompliance is inconsequential as it relates to motor vehicle safety:

1. Consolidated Glass & Mirror, LLC
110 Jack Guynn Drive
Galax, VA. 24333
2. Between November 2017 and March 29, 2018, Custom Glass manufactured and shipped to Vapor Bus, Buffalo Grove, Illinois, approximately 1,390 laminated glass panes, other than windscreens, to be used in the doors of busses manufactured by Nova Bus in Plattsburg, New York. The parts consist of two 2.5 mm glass panes bonded together by a 0.38 mm PVB layer by CGM.

The parts as manufactured and shipped by CGM fail to “fully” comply with 49 C.F.R. 571.205, §6 in that they are affixed with a misprinted AS number. The correct AS number is AS-2, but the AS number on the laminated glass panes is misprinted and reads AS-S. The parts are affixed with the Guardian trademark and the correct DOT number and M number.

Although the laminated glass parts are affixed with the misprinted AS number, the glass construction from which the laminated glass parts were fabricated is in full compliance with the technical requirements that 49 C.F.R. §571.205 currently applies to laminated glass for use anywhere in a motor vehicle except windshields. (See supporting test report issued by Element Materials Technology). In no way is the actual safety aspect of the laminated glass compromised by the misprinted AS number.

ES18-002064

In spite of the misprinted AS number being affixed to the laminated glass parts described herein, the correct part was sold and shipped to Vapor Bus for use in the fabrication of the doors subsequently shipped by Vapor Bus to Nova Bus.

CGM asserts that the noncompliance reported herein could not result in the wrong part being used in an OEM application given that the part would be ordered by its unique part number and not the "M number" (which corresponds to the glass construction from which the part is fabricated). The parts are also easily traceable back to CGM via our unique DOT number.

Based on these facts, CGM requests that this petition for exemption from the notification and remedy requirements of 49 U.S.C. §301 be granted on the grounds that the noncompliance is inconsequential as it relates to motor vehicle safety.

Best regards,

A handwritten signature in blue ink that reads "David Evans". The signature is written in a cursive style.

David Evans
Quality Manager, Consolidated Glass & Mirror, LLC

Part 573 Safety Recall Report

20E-023

Manufacturer Name : Guardian Industries Corp.

Submission Date : APR 15, 2020

NHTSA Recall No. : 20E-023

Manufacturer Recall No. : NR



Manufacturer Information :

Manufacturer Name : Guardian Industries Corp.

Address : 2300 Harmon Road

Auburn Hills MI 48326

Company phone : 248-340-1800

Population :

Number of potentially involved : 1,390

Estimated percentage with defect : 100 %

Equipment Information :

Brand / Trade 1 : Window

Model : Bus door window

Part No. : 51236030

Size : NR

Function : NR

Descriptive Information : The basis for how the recall population was determined is the AS number on the label is misprinted, ie, the AS number on label is AS-S instead of AS-2. The glass panes are windows in bus doors. There are approximately 1,390 glass panes involved.

Production Dates : NOV 01, 2017 - MAR 29, 2018

Description of Noncompliance :

Description of the Noncompliance : The AS number on the label is AS-S instead of AS-2.

FMVSS 1 : 205 - Glazing materials

FMVSS 2 : NR

Description of the Safety Risk : None - there is NO safety risk because this is ONLY a misprint label noncompliance. The construction of the window meets AS-2 requirements. This is ONLY a misprinted AS number on the label.

Description of the Cause : Typographical error made by label designer.

Identification of Any Warning that can Occur : NR

Involved Components :

Component Name : Window

Component Description : Window

Component Part Number : 51236030

Supplier Identification :

Component Manufacturer

Name : Consolidated Glass & Mirror, LLC

Address : 110 Jack Guynn Drive

Galax VIRGINIA 24333

Country : United States

Chronology :

3/29/2018: Date first made aware of the noncompliance. 3/29/2018: Containment completed at manufacturing site and no parts with a misprinted label were located. 3/29/2018: Determined to be a noncompliance issue because parts testing continues to show specifications are being met confirming this is a label noncompliance only and not a safety-related noncompliance.

Description of Remedy :

Description of Remedy Program : This matter is inconsequential to motor vehicle safety. A petition was filed on May 23, 2018 stating this. We will either replace the windows or manually sand etch AS-2 and block out the misprinted AS number on the label on the existing window in the installed position. By blocking out the misprinted AS number, it will no longer be visible. As we determine where the windows are located, we will determine which option makes more sense (either manual sand etch or replacement).

How Remedy Component Differs from Recalled Component : The replaced window p/n 51236030 will have AS-2 included in the label. A window that has been manually updated will have AS-2 on the label and the misprinted AS number blocked out so it is not visible.

Identify How/When Recall Condition was Corrected in Production : 3/29/2018: The mis-printed label was corrected in the database and verified to be correct by the Quality Manager.

Recall Schedule :

Description of Recall Schedule : Notifications were made by Vapor Corporation in May 2018.

Planned Dealer Notification Date : MAY 01, 2020 - MAY 01, 2020

Planned Owner Notification Date : MAY 01, 2020 - MAY 01, 2020

Purchaser Information :

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name : Vapor Corporation

Address : 1010 Johnson Drive
Buffalo Grove IL 60089

Country : US

Company Phone : 8477776473

* NR - Not Reported