

Part 573 Safety Recall Report

24E-060

Manufacturer Name : Webasto Thermo & Comfort NA, INC

Submission Date : JUL 15, 2024

NHTSA Recall No. : 24E-060

Manufacturer Recall No. : NR



Manufacturer Information :

Manufacturer Name : Webasto Thermo & Comfort NA, INC

Address : 2500 Executive Blvd
Auburn Hills MI 48326

Company phone : 248-789-0538

Population :

Number of potentially involved : 2,710

Estimated percentage with defect : NR

Equipment Information :

Brand / Trade 1 : HV Coolant Heater

Model : HVH

Part No. : HVH100, HVH70, HVH50

Size : NR

Function : NR

Descriptive Information : The High Voltage Coolant Heater (models HVH100 (800V a 10 kW) and HVH50/70 (400V a 5/7 kW)) ("HVCH") manufactured by Webasto Thermo & Comfort SE ("Webasto") is produced as a function-relevant "off the shelf" standard component. It is sold as original equipment to vehicle manufacturers and is usually used for heating cabin and/or battery in hybrid and electric vehicles produced by various vehicle manufacturers ("Customers") (please see list of Webasto's HVCH Customers provided to NHTSA previously). Customers are responsible for the system integration and application (i.e., the assembly and installation) of the HVCH into the respective vehicles and are individually determining the specific purpose for which the HVCH shall serve as a component within the overall system of the vehicle.

A Part 573 Safety Recall Report was submitted by Jaguar Land Rover North America, LLC ("JLR") in July 2023 (23V-518), and by Lucid USA, Inc. ("Lucid") in January 2024 (24V-011), in which they asserted a defectiveness of the HVCH affecting the defrosting of the windshields. Webasto has determined that the HVCH functions properly if integrated according to and used within the Webasto Specification.

Webasto has not determined that the HVCH is defective, Webasto is submitting this Part 573 report to respond to NHTSA's request and in a good faith effort to comply with NHTSA's interpretation of the reporting obligations as per 49 CFR. § 573.3(f), as well as to inform vehicle manufacturers that have purchased an HVCH.

Production Dates : SEP 07, 2015 - JUL 15, 2024

Description of Defect :

Description of the Defect : JLR and Lucid have reported that the HVCH shuts down. Webasto has not determined the presence of a defect.

FMVSS 1 : NR

FMVSS 2 : NR

Description of the Safety Risk : JLR and Lucid have reported that the HVCH shuts down and does not defrost the windshield anymore. Webasto has not determined the presence of a defect.

Description of the Cause : Webasto has determined that the HVCH functions properly if integrated according to and used within the Webasto Specification. One or a combination of factors in the vehicle system can potentially cause a shut down of the heater:

- No pre run of the coolant pump
- No post run of the coolant pump
- No sufficient coolant flow during operation
- Activation without coolant flow
- No sufficient deaeration of the coolant circuit

Identification of Any Warning that can Occur : The HVCH is sending a defined code of error signals to the board computer of the vehicle.

Involved Components :

Component Name : NR

Component Description : NR

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : Webasto Thermo & Comfort SE

Address : Friedrichshafener Str. 9
Gilching Foreign States 82205

Country : Germany

Chronology :

Since 2021: communication to JLR, and since 2023, communication to Lucid, with Webasto denying

responsibility of customers’ alleged defect claims, on Webasto having identified non-compliance by customers with Webasto’s specification, and that Webasto is providing the HVCH as a component without system responsibility.

July 27, 2023: JLR submitted a Part 573 Safety Recall Report (23V-518).

Aug, 2023: Webasto learned about JLR’s Recall Report via market observation and discovered only at this point that JLR uses the HVCH to fulfil vehicle safety requirements; JLR had not informed or consulted Webasto prior to submitting the report.

Oct 25, 2023 and Nov 6, 2023, Webasto responded to NHTSA’s Information Request re Recall 23V-518, submitting a list of HVCH purchasers with a statement that Webasto disagrees with JLR’s assertions, as the HVCH was delivered defect-free and an incorrect system integration by JLR was identified as the cause for the claimed failure.

Jan 11, 2024: Lucid submitted a Part 573 Recall Report (24V-011).

Feb 29, 2024, Webasto representatives met virtually with NHTSA officials to discuss Webasto responsibilities pertaining to 573.3(f) requirements.

March 8, 2024, Webasto submitted a comprehensive statement to NHTSA, providing further information on the fact that the HVCH is not defective and that a wrong system integration by Customers was the cause for the failure.

April 4, 2024, NHTSA informed Webasto that they are opening an Audit Query (AQ24-004), requesting Webasto to provide further information and data.

Since May 2024 Webasto continuously cooperated with NHTSA by submitting information to address NHTSA’s Audit Query and meeting virtually with NHTSA officials.

July 15, 2024: Although Webasto has not determined that the HVCH is defective, Webasto is submitting this Part 573 report to respond to NHTSA’s request and in a good faith effort to comply with NHTSA’s interpretation of the reporting obligations as per 49 CFR. 573.3(f).

Description of Remedy :

Description of Remedy Program :	The remedy program, if any, will be determined by each vehicle manufacturer that has decided that a safety-related defect exists in their vehicles.
How Remedy Component Differs from Recalled Component :	Webasto has not determined the presence of a defect.
Identify How/When Recall Condition was Corrected in Production :	Webasto has not determined that there is a defect.

Recall Schedule :

Description of Recall Schedule : NR

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

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 : NR

Address : NR

NR

Country : NR

Company Phone : NR

* NR - Not Reported