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November 6, 2009

Daniel C. Smith, Esq.  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Belkin International, Inc.  
TuneBase MP3 Player Car Adapter Products

Dear Mr. Smith:

Belkin International, Inc. ("Belkin") has determined that a potential safety problem exists with some of its TuneBase MP3 player car adapter products, and is hereby notifying the National Highway Traffic Safety Administration<sup>1/</sup> in accordance with 49 CFR Part 573, of the corrective action it has taken to voluntarily recall these products.

#### 1. Contact Information

Belkin International, Inc. is the private labeler of the subject products and is located at 501 W. Walnut Street, Compton, California 90220.

Sheenway Technology Limited is the contract manufacture and is located at Room 1313, 13/F., Austin Tower, 22-26 Austin Avenue, Tsimshatsui, Kowloon, Hong Kong.

For questions concerning this voluntary recall, please contact:

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<sup>1/</sup> Please note that on October 21, 2009, Belkin notified the U.S. Consumer Product Safety Commission (CPSC) of this safety issue. By letter dated October 29, 2009, Tanya Topka, Compliance Team Lead, Defect Investigation Division, US CPSC, indicated that the CPSC staff determined that the products do not fall within the CPSC's jurisdiction.

## 2. Items Involved

The following Belkin products are covered by this report and Belkin's voluntary recall:

TuneBase FM with Hands-Free  
TuneBase Direct with Hands-Free  
TuneBase™ FM with Clear Scan

Depending on the region where these products were purchased, these products are known by the following model numbers: F8Z441, F8Z441ea, F8Z442, F8Z442ea, F8Z176, and F8Z176eaBLK.

The model number is located on the back of the product as shown here.



F8Z441



F8Z442



F8Z176

## 3. Total Number of Items Potentially Affected

Approximately 241,000 of the three models combined have been sold to consumers in the U.S. and Canada.

## 4. Approximate Percentage of Items Estimated to Contain the Potential Defect

100%

## 5. Description of the Potential Defect

Belkin has determined that a component of the TuneBase, the washer, can cause an electrical short circuit when plugged into a vehicle's cigarette lighter adapter. The washer is a circular, black, plastic unit situated at the tip of the TuneBase's cigarette lighter adapter. Under certain conditions of heat,

humidity and prolonged periods of power-on (*e.g.* when the TuneBase is left plugged in overnight), some units with the washer have shown potential to pose a risk of fire.

A third-party independent lab is investigating what caused the conductivity in the washers. The manufacturer of the washers is HONG SHENG RUBBER FACTORY located at Di Shan Xin Jie 6#, Sha Gang No.1 Industrial Zone, Chang An Town, Dong Guan City, Guang Dong.

While Belkin believes this issue may be isolated to a limited number of units produced with this washer, Belkin places the safety of its consumers ahead of all other considerations and is recalling all TuneBase products purchased by consumers between April 1, 2009 and October 30, 2009.

#### **6. Information Considered in Making This Determination**

Belkin recently became aware of a potential issue with the F8Z442. Belkin has been notified of 7 alleged incidents in the U.S and 4 alleged incidents abroad where the units have melted the vehicle's dashboard. Belkin is not aware of any personal injuries involving these products.

Belkin tried internally to recreate the failure, by examining damaged units and creating component failures, such as shorting components, overloading outputs. Belkin was unable to recreate any failure. Belkin then contacted a third-party independent lab to assist with the investigation.

As part of its investigation, Belkin questioned Sheenway with regards to the product. Sheenway indicated that they had found discrepant product in its incoming inspection process. Sheenway thought they had sequestered all the bad washers. Based on the investigation, Sheenway determined that the bad batch of washers was made during the July and August, 2009 time frame.

To ensure consumer safety, Belkin decided to recall all products manufactured 3 months prior to the known period of the bad batch of washers. Thus the recall includes April, May, and June 2009 productions months, as well as the units produced in July and August 2009.

#### **7. Program for Remediating the Potential Defect**

On October 23, 2009, Belkin published a worldwide recall notification and posted a copy on its official website in 16 languages for 52 countries / regions including China mainland, Hong Kong and Taiwan. <http://www.belkin.com/support/tunebase/exchange/>. On October 22 and 23, 2009, Belkin also informed its distributors to stop sale of these products and to return their remaining inventory to Belkin. This notification included a "Safety Recall" notice to be placed in retail stores. A copy of the notification to Belkin's distributors and the in-store notice are attached at "A" and "B." Finally, in November 2009, Belkin contacted consumers who purchased the TuneBase units directly from Belkin's website and advised them to return the products to Belkin. A copy of this notification is attached at "C."

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Affected products are to be returned to Belkin where the washer will be replaced and the repaired units will be returned to Belkin's distributors and consumers free of charge.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jill M. Zucker". The signature is written in a cursive style with a large, stylized initial "J".

Jill M. Zucker  
Counsel to Belkin International, Inc.

Attachments

# Attachment A

# IMPORTANT SAFETY NOTICE

## Notice to Resellers and Distributors of Belkin's

### **TuneBase™ FM with Hands-Free TuneBase™ Direct with Hands-Free TuneBase™ FM with ClearScan**

Belkin International, Inc., will be initiating a voluntary global product recall on October 23, 2009 of its TuneBase Direct with Hands-Free, TuneBase FM with Hands-Free, and TuneBase FM with ClearScan (model numbers listed below).

After a rigorous investigation, Belkin has determined that a component of the TuneBase, the washer, can cause an electrical short circuit when plugged into a vehicle's cigarette lighter adapter. The washer is a circular, black, plastic unit situated at the tip of the TuneBase's cigarette lighter adapter. Under certain conditions of heat, humidity, and prolonged periods of power-on (e.g., when the TuneBase is left plugged in overnight), some units with the washer have shown potential to pose a risk of fire.

While we believe this issue may be isolated to a limited number of units produced with this washer, in the interest of absolute public safety, Belkin International Inc. is issuing this voluntary product recall. Please note this recall only relates to products purchased by consumers prior to April 1, 2009. This recall affects the following products:

- TuneBase™ FM with Hands-Free F8Z441 / F8Z441ea
- TuneBase™ Direct with Hands-Free F8Z442 / F8Z442ea
- TuneBase™ with ClearScan F8Z176 / F8Z176eaBLK

We request that you discontinue the sale of these products immediately and return any stock of these products to Belkin. New inventory will be shipped out to replace your on-hand stock.

Return units to Belkin Int'l Inc., 501 W. Walnut, Compton, CA 90220. All recall units should be placard at the pallet level with the following notice "TUNEBASE RECALL". For shipments up to 20 cartons please return via UPS Ground Collect to account number 8F0620. Over 20 cartons to 10 pallets please return via Old Dominion freight Collect, and for loads over 10 pallets please contact Belkin Traffic at 317-837-7308 so that carriers can be arranged for pick-up.

Belkin has notified the U.S. Consumer Product Safety Commission (CPSC) about this matter. Please distribute to each of your retail stores the attached "SAFETY RECALL" notice to be posted in each store for at least 120 days. In addition, Belkin would appreciate if you would post the safety notice on your website as well.



**F8Z441**



**F8Z442**



**F8Z176**

# Attachment B



# SAFETY RECALL

**Belkin Int'l Inc. is recalling the following products if purchased between April 1, 2009 and October 30, 2009:**

**TuneBase™ FM with Hands-Free  
TuneBase™ Direct with Hands-Free  
TuneBase™ with ClearScan**

**F8Z441 / F8Z441ea  
F8Z442 / F8Z442ea  
F8Z176 / F8Z176eaBLK**



**Consumers should stop using these products immediately.**

The washer of the TuneBase, a circular, black, plastic unit situated at the tip of the TuneBase's cigarette lighter adapter, can cause an electrical short circuit when plugged into a vehicle's cigarette lighter adapter.

Under certain conditions with prolonged periods of power-on (e.g., when the TuneBase is left plugged in overnight), some units with the defective washer have shown potential to pose a risk of fire.

**Contact Belkin to participate in its TuneBase exchange program that will provide eligible customers with a TuneBase replacement, free of charge:**

- Via the web at: [www.belkin.com/tunebaserecall](http://www.belkin.com/tunebaserecall)
- Customers without Internet access can call: **888-262-1020**

Please keep posted until March 10, 2010.

# **Attachment C**

**From:** "Belkin International, Inc." <[noreply@belkin.com](mailto:noreply@belkin.com)>  
**Date:** November 2, 2009 2:06:41 PM EST  
**To:** [jmasiello@me.com](mailto:jmasiello@me.com)  
**Subject:** **Belkin TuneBase Recall Notice**  
**Reply-To:** [noreply@belkin.com](mailto:noreply@belkin.com)

Our records indicate that you purchased a Belkin TuneBase from us, registered it with us, or contacted technical support about it.

We're writing to inform you that we've initiated a voluntary global product recall of our TuneBase™ Direct with Hands-Free, TuneBase FM with Hands-Free, and TuneBase FM with ClearScan.

Please stop using the product immediately as it has shown potential risk for fire.

A component of the TuneBase, the washer, can cause an electrical short circuit when plugged into a vehicle's cigarette lighter adapter and when under certain conditions of heat, humidity, and prolonged periods of power-on (e.g., when the TuneBase is left plugged in overnight). The washer is a circular, black, plastic unit situated at the tip of the TuneBase's cigarette lighter adapter.

While we believe this issue may be isolated to a limited number of units produced with this washer, we are recalling all TuneBases purchased between April 1, 2009 and October 30, 2009.

To participate in our TuneBase exchange program free of charge, please see [www.belkin.com/tunebaserecall](http://www.belkin.com/tunebaserecall)

The product names and model numbers are listed below (model numbers are located on the back of the product itself).

Product Name	Model Number
TuneBase™ FM with Hands-Free	F8Z441 or F8Z441ea
TuneBase™ Direct with Hands-Free	F8Z442 or F8Z442ea
TuneBase™ with ClearScan	F8Z176 or F8Z176eaBLK

Please note that the product box may have a slightly different model number. Please refer to the actual product to find the correct model number

This email was sent to [jmasiello@me.com](mailto:jmasiello@me.com) by [noreply@belkin.com](mailto:noreply@belkin.com).  
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Belkin International, Inc. | 501 West Walnut Street | Compton | CA | 90220