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2007 JUN 15 PM 2:35

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June 13, 2007

National Highway Traffic Safety Administration  
Richard Boyd, Chief  
Medium and Heavy Truck Division  
Office of Defects Investigation  
400 Seventh Street, SW  
Washington, D.C. 20590

RE: PE07-020

Dear Mr. Boyd

Pursuant to your inquiry (NHTSA PE 07-020) dated May 02, 2007, you will find below verbatim each question in your inquiry with our responses following as instructed.

1. Provide a table that lists by model year, model, build date and manufacturing location, the total number of subject vehicles that Blue Bird has manufactured for sale or lease in the United States. Provide the table in Excel, or a compatible format, entitled, "Response to No. 1, POPULATION." **Also provide the same information on any other models that utilize the same floor track mounting system.**

**Blue Bird's Response:**

See attached Excel spread sheet titled Response to No. 1 "Population" and Response to No 1 "Population-Other Models".

2. Identify all vehicles to which Blue Bird has performed any field repairs/retrofit procedure by repair date, model year, make, model, date of sale, owner/fleet name, address, telephone phone number, contact representative, and reason for offering the retrofit. Provide a table in Excel, or a compatible format, entitled, Response No. 2, "Fleet Retrofit."

**Blue Bird's Response:**

Blue Bird has not performed any fleet retrofits.

**BLUE BIRD CORPORATION**  
P.O. Box 937 • Fort Valley, Georgia 31030  
Phone: (478) 825-2021

3. State the total number of each, by calendar year and month and **provide copies** of the following, received by Blue Bird, or of which Blue Bird is otherwise aware, separated by fleets/owner, which relate to, or may relate to, the alleged defect in the subject vehicles:
- a. Consumer complaints, including those from fleet operators;
  - b. Field reports, including dealer field reports;
  - c. Property damage claims;
  - d. Third-party arbitration proceedings where Blue Bird is or was a party to the arbitration; and,
  - e. Lawsuits, both pending and closed, in which Blue Bird /purchaser is or was a defendant or codefendant.

Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" provide a summary description of the alleged problem and causal and contributing factors and Blue Bird's assessment of the problem, with a summary of the significant underlying facts and evidence. Also for items "d and "e, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Provide the table in Excel, or a compatible format, entitled, "Response No. 3 COMPLAINT DATA."

**Blue Bird's Response:**

- a. Consumer complaints, including those from fleet operators;  
See: Response to No. 4 "Claim Data".

On August 25, 2003 Blue Bird received a complaint via email regarding seat floor track corrosion from Rusty Seastrum with New York DOT. Copy of email is enclosed. Blue Bird replaced the aluminum Seat Floor track under a policy allowance. See Item 1 on Response to no.4. Claim Data.

On December 04, 2003 Blue Bird Customer Service received a complaint regarding seat floor track corrosion via email from our distributor OBS, Inc. in Canton Ohio. Copy of email is enclosed. On January 17, Blue Bird responded (See enclosed email from Tim Lacy, Blue Bird Director of Customer Service to Bob Ferne of OBS, Inc.) detailing a policy allowance (goodwill) to address the complaints of Franklin County Board of MRDD.

- b. Field reports, including dealer field reports;  
None
  - c. Property damage claims;  
None
  - d. Third-party arbitration proceedings where Blue Bird is or was a party to the arbitration; and,  
None
  - e. Lawsuits, both pending and closed, in which Blue Bird /purchaser is or was a defendant or codefendant.
    - a. None
4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, provide the following information:
- a. Blue Bird's file number or other identifier used;
  - b. The category of the item, as identified in Request No.3 (i.e., consumer complaint, field report, etc.);
  - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - d. Vehicle's VIN and body or serial number;
  - e. Vehicle's make, model and model year;
  - f. Vehicle's mileage at time of incident;
  - g. Incident date;
  - h. Report or claim date;
  - i. Whether property damage is alleged;
  - j. Number of alleged injuries, if any;
  - k. Number of alleged fatalities, if any.
  - l. Concern stated by customer;
  - m. Comment and final resolution (identify by part number what component was replaced, if any), by dealer/technician relating to claim and/or repair; and
  - n. Blue Bird's assessment of the claim.

Provide this information in Excel, or a compatible format, entitled "Response to No. 4 CLAIM DATA."

**Blue Bird's Response:**

See attached Excel spread sheet titled: "Response to No. 4 CLAIM DATA."

5. State, by make, model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Blue Bird to date that relate to, or may relate to, the alleged defect in the subject vehicles: **warranty claims; extended warranty claims;** claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign. Separately, provide a copy of each claim.

Also, separately, for each such claim, state the following information:

- a. Blue Bird's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealers or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer;
- k. Comment and resolution (identify what component was replaced including part Number), if any, by dealer/technician relating to claim and/or repair; and
- l. Blue Bird's assessment of the claim, including reason for granting claim.
- m. Category, goodwill, warranty, etc.

Also, Provide this information in Excel, or a compatible format, entitled "Response to No.5 CLAIM PAID DATA."

Produce copies of all documents related to each item within the scope of Request No.5. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Blue Bird used for organizing the documents. *Any duplicate failure should be counted separately.*

**Blue Bird's Response:**

See attached Excel spread sheet titled: "Response to No. 5 CLAIM PAID DATA."

Copies of warranty claims are enclosed.

6. For each claim denied in question number 3 and 5, provide the following information:
  - a. Blue Bird's claim number and reason for the claim being denied;
  - b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
  - c. VIN, body or serial number;
  - d. Concern stated by customer;
  - e. How was the bus repaired and date of repair;
  - f. Vehicle mileage at time of repair;
  - g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
  - h. Labor operation number;
  - i. Problem code;
  - j. Replacement part number(s) and description(s); and
  - k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Excel, or a compatible format, entitled "Response to No.6 CLAIM DENIED DATA."

**Blue Bird's Response:**

No claims submitted related to the seat floor track have been denied by Blue Bird

7. Describe in detail the search criteria used by Blue Bird to identify the claims identified in response to Request No.3 and 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles.

**Blue Bird's Response:**

A search of our warranty system was conducted using the following criteria:

Component Codes:

70-200-100 Seat Assy., Passenger, Complete, LH  
 70-200-103 Seat Assy., Passenger, Complete, RH  
 70-200-151 Seat Assy., Flip Seat. LH  
 70-200-154 Seat Assy., Flip Seat. LH  
 70-500-112 Retainer, Wheelchair, Mechanical  
 70-500-121 Track, Wheelchair Retainer/Belts

Failure Codes:

20 Rust: Surface  
 21 Rust: Perforation  
 23 Loose  
 24 Disconnected:  
 61 Disengages  
 RS Rust: Surface  
 RP Rust: Perforation  
 DS Disconnected  
 DS Disengages  
 FL Fit Loose  
 LS Loose

Repair Operations:

05 Adjust  
 99 Other (describe in text)

8. Provide a detailed drawing depicting the seat track configuration on the subject buses. Identify the size and dimension of the subject tracks and all necessary hardware.

**Blue Bird's Response:**

See enclosed installation drawing numbers 1820430, 0015515, 0054043 and seat floor track drawing numbers 1788264, 0010010, 0031447.

9. Starting from the first claim, or the time Blue Birds first became aware of this issue to present, provide a detailed chronology of all events regarding the subject defect. Include all information including knowledge of the first failure/claim, internal meetings, meetings with the seat track manufacturer, other manufacturers, and fleet owners. Describe how Blue Bird first became aware of the alleged defect and state the date on which Blue Bird first became aware of the possibility of the alleged defect. Blue Bird Stated that between a certain time-frame they purchased seat tracks that were not "anodized." Provide the dates that the non-anodized tracks were purchased. Explain what precipitated the purchase of the anodized track.

**Blue Bird's Response:**

On August 25, 2003 Blue Bird Customer Service received an email dated August 22, 2003 from Rusty Seastrum of the New York DOT regarding corrosion of the seat floor tracks on a 1999 year model bus.

On December 04, 2003 Blue Bird Customer Service received an email from our distributor in Ohio regarding corrosion of seat floor tracks on six 1999 year model buses operated by Franklin County Board of MRDD in Columbus Ohio.

The original seat floor tracks used by Blue Bird from May 12, 1995 through October 03, 1999 were non-anodized aluminum seat floor tracks. As a result of a supplier change, Blue Bird began using anodized aluminum seat floor tracks on October 04, 1999.

In addition to the above documented complaints, Blue Bird Customer Service received several undocumented telephone calls from our distributors in Ohio and NY regarding the replacement of seat floor tracks as identified in Response No. 4 Claim Data. The earliest date is not known.

10. State the new warranty coverage offered by Blue Bird regarding the seat track on the subject buses. Describe any extended warranty coverage option(s) related to the alleged defect that Blue Bird offered for the subject vehicles related to the alleged defect. Also, provide an exemplar of the subject track.

**Blue Bird's Response:**

Blue Bird's standard warranty coverage for the seat floor tracks is 12 months or 12,000 miles, whichever occurs first from date of delivery to the first user of the bus.

Blue Bird has not offered any "new" warranty coverage on the seat floor tracks. A policy allowance (good will) was extended to Franklin County Board of MRDD in Columbus, Ohio for a specified number of buses (70) for a period of 12 months or 12,000 miles. Franklin County Board of MRDD has file for the policy allowance for only 8 of the buses covered.

An exemplar of the subject track was provided to the testing agency as requested.

11. Produce copies of all service bulletins, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject buses, that Blue Bird has issued to any manufacturer, dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also, state the date in which these documents were issued, to whom, and the date they were submitted to NHTSA in accordance with applicable regulations, such as CFR. 579.5. Also, include the latest draft copy of any communication that Blue Bird is planning to issue. Separately, identify and describe what precipitated each document.

**Blue Bird's Response:**

Blue Bird has not issued any service bulletins related to the alleged defect. A copy of Blue Bird's Limited Warranty statement in force at the time the subject buses were manufactured is enclosed.

12. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject buses that have been conducted, are being conducted, are planned, or are being planned by, or for, and including any actions conducted by Blue Bird. For each such action, provide the following information:
  - a. Action title or identifier;
  - b. The actual or planned start date;
  - c. The actual or expected end date;
  - d. Brief summary of the subject and objective of the action;
  - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and,
  - f. A brief summary of the findings and/or conclusions resulting from the action.

**Blue Bird's Response:**

None, other than testing recently conducted at the behest of NHTSA

13. For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action date.

See response to No. 12.

14. Describe all modifications or changes made by Blue Bird, or on behalf of Blue Bird in the design, material composition, manufacture, quality control, supply, or installation of the subject seat track installed in the subject buses, from the start of the model year of the subject vehicles to present date, which relate to, or may relate to, the alleged defect in the subject buses. For each such modification or change, provide the following information:
- a. The date or approximate date on which the modification or change was incorporated into the buses;
  - b. A detailed description of the modification or change;
  - c. The reason(s) for the modification or change;
  - d. The part numbers (service and engineering) of the original component;
  - e. The part number (service and engineering) of the modified component;
  - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
  - g. When the modified component was made available as a service component; and,
  - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Blue Bird is aware of which may be incorporated into vehicle production within the next 120 days.

**Blue Bird's Response:**

The only changes made in the seat floor tracks since it's original implementation were the result of changes in suppliers. The 1996 through 1999 year model buses were manufactured with Kinedyne non-anodized aluminum floor tracks, Blue Bird part number 1788264. On October 04, 1999 (beginning 2000 model year buses) Blue Bird began using Ancra clear anodized aluminum floor tracks, Blue Bird part number 0010010. The new supplier, Ancra, offered the clear anodized aluminum floor tracks as an improvement over the Kinedyne non-anodized aluminum floor tracks. Kinedyne countered with anodized aluminum floor tracks and Blue Bird elected to continue our supplier arrangement with Kinedyne and implemented their anodized aluminum floor tracks on October 02, 2000 with the 2001 model year production..

The Ancra floor track can be replaced with the Kinedyne floor track, Blue Bird part number 0031447.

In response to Franklin County Board of MRDD Blue Bird set up an option that included a mylar barrier between the seat floor track and the floor of the bus. No

testing was done to determine the viability of such action. To date Franklin County Board of MRDD is the only customer to order this option.

No material or finish changes are anticipated to occur within the next 120 days. However, Blue Bird will be evaluating processes and/or procedures in an effort to determine if aluminum seat floor tracks that may need to be replaced can be reasonably identified. This information when determined will be incorporated into a service update and mailed to owners operating buses with aluminum seat floor tracks in the Northern "Rust Belt" states.

15. Describe the differences and similarities between the non-anodized track assembly used on the subject buses and the anodized replacement seat track assembly. Provide a copy of all compliance testing documents relative to Federal Motor Vehicle Safety Standard 222 certification performed by Blue Bird, or on their behalf, on the subject buses and their seat tracks.

**Blue Bird's Response:**

There are only minor changes in the foot print of the non anodized floor track and the anodized floor track. See enclosed seat floor track drawings 1788264, 0010010 and 0031447.

Copies of FMVSS 222 certification test are enclosed.

16. Furnish Blue Bird's assessment of the alleged defect in the subject vehicle including:
- a. The causal or contributory factor(s);
  - b. The failure mechanism(s);
  - c. The failure mode(s);
  - d. The risk to motor vehicle safety that it poses; and
  - e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning.

**Blue Bird's Response:**

- a. Highly corrosive elements used on highways in certain northern states in the winter may contribute to the alleged defect.
- b. The alleged defect may occur as a result of galvanic action between the aluminum floor track and highly corrosive elements used on highways in certain northern states during the winter.
- c. The alleged defect may occur as a result of galvanic action between the aluminum floor track and highly corrosive elements used on highways in certain northern states during the winter.
- d. Based on currently available data and recent successful FMVSS 222 pull test conducted on behalf of the Agency (NHTSA), Blue Bird does not view the alleged defect as an unreasonable risk to motor vehicle safety.

- e. The alleged defect may make the seat floor tracks difficult to use due to debris build up in the floor track channels. Also, signs of corrosion may become visible around some seat floor track attaching bolts.
17. Furnish a copy of all documents not specifically requested herein, which Blue Bird believes are relevant to, or which were used in formulating its assessment of, the alleged defect. **Identify what action Blue Bird intends to take on this issue.**

**Blue Bird's Response:**

Based on currently available data and recent successful FMVSS 222 pull test conducted on behalf of the Agency (NHTSA), As noted in the last paragraph of our response to No. 14 once reasonable inspection procedures are determined Blue Bird plans to publish a service update to owners advising owners to inspect the aluminum seat floor tracks on a regular basis and replace as necessary. The service update will be sent to owners operating vehicles in the following states.

Connecticut	Indiana	Minnesota	Pennsylvania
Washington, DC	Massachusetts	New Hampshire	Rhode Island
Delaware	Maryland	New Jersey	Vermont
Iowa	Maine	New York	Wisconsin
Illinois	Michigan	Ohio	West Virginia



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