



BLUE BIRD

OFFICE OF DEFECTS &
INVESTIGATIONS
2009 DEC 18 P 1:56

December 17, 2009

Mr. Richard Boyd, Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Blue Bird Body Company response to Defect Petition DP09-006

Dear Mr. Boyd:

The following information is provided in response to questions detailed in Defect Petition DP09-006 dealing with Recall 07V-586 received via e-mail on December 4, 2009. Specific questions are repeated below with responses. The remedial actions associated with this Recall were initially performed under contract with Complete Coachworks. Since Complete Coachworks is no longer a viable company, Blue Bird is completing the remaining items at its facility in Fort Valley, Georgia.

As detailed below, and as discussed with the agency previously, Blue Bird has taken numerous steps to remedy the safety defect that led to the voluntary initiation of this recall, i.e., a front end overweight condition. To date, all affected coaches have had the safety-related defect addressed (However to date there are a few owners that have refused to allow relocation of the generator). The remaining open issues on certain coaches are items that do not affect the safe and normal operation or use of these vehicles. There have been no reports of tire or axle failures or any other incidents related to the defect condition on any of the remedied vehicles.

This response is based upon information gathered from Blue Bird locations where such information is ordinarily found, i.e., Blue Bird's Engineering, Service and Warranty Departments. This information was gathered as of December 16, 2009.

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1. Provide a list that identifies the menu (choices) of remedial actions that Blue Bird deployed to correct/mitigate the defects identified in Campaign 07V-586.

RESPONSE:

- a) Install new front tie rods and increase front gross axle weight rating (GAWR) from 16,000 to 17,000 pounds
 - b) Install new Michelin 315/80R22.5L XZA2 tires on front with 130 psi
 - c) Perform front end alignment
 - d) Increase gross vehicle weight rating (GVWR) by 2,000 pounds (1,000 pounds front & 1,000 pounds drive axle)
 - e) Install Hadley air leveling system crossover kit with reprogrammed control unit
 - f) Calibrate and set air governor to 130 psi
 - g) Relocate generator from front to third storage bay (some units)
 - h) Install auxiliary air compressor for tire inflation
 - i) Modify trailer hitch tongue load from 1,850 pounds to 1,000 pounds (some units)
 - j) Install 130 psi front tire inflation placard on dash
 - k) Provide Owner's Manual addendums
 - l) Add new vehicle certification label with 54,000 GVWR
 - m) Provide decals for: 1) Operation of auxiliary air compressor, 2) Trailer hitch capacity, 3) Recommended tire inflation levels, and 4) Under floor storage bay load capacities
 - n) Install larger capacity coolant reservoir on units with relocated generator
 - o) Install larger capacity cooling fan and improve generator access on units with relocated generator
 - p) Relocate generator power control box on units with relocated generator
 - q) Remove steel generator support structure from front generator compartment on units that have relocated generator (some units)
2. For each remedial action identified in response to Request No. 1 above, identify by VIN which vehicle(s) received each of the identified remedy action(s).

RESPONSE:

See enclosed spreadsheet (Remedial Actions Status For Campaign 07V-586) for status as of December 16, 2009. Remedial actions are ongoing and are being scheduled at owner permission and convenience.

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3. For each remedial action identified in response to (1) above, describe the effect(s) that that action had on vehicle operation including, but not limited to, cargo carrying capacity and/or load placement limitations and/or restrictions.

RESPONSE:

- a) Install new front tie rods and increased front gross axle weight rating (GAWR) from 16,000 to 17,000 pounds
 - Increased independent front suspension load capacity by 1,000 pounds.
- b) Install new Michelin 315/80R22.5L XZA2 tires on front with 130 psi
 - Increased load carrying capacity of front tires to over 17,000 pounds.
- c) Perform front end alignment
 - Assure front end alignment with new tie rods.
- d) Increase gross vehicle weight rating (GVWR) by 2,000 pounds (1,000 pounds front & 1,000 pounds drive axle)
 - Increased cargo carrying capacity 1,000 pounds on front and 1,000 pounds on drive axle.
- e) Install Hadley air leveling system crossover kit with reprogrammed control unit
 - Equalized front loading so that left and right sides were balanced while driving. Also recalibrated control unit that determines loading on drive and tag axles.
- f) Calibrate and set air governor to 130 psi
 - Improves performance of Hadley air leveling system.
- g) Relocate generator from front to third storage bay (some units)
 - Relocated approximately 1,200 pounds from front of coach
 - Reduced approximately 37 cu ft of available 235 cu ft of under floor storage space. However 45 of 51 coaches with relocated generators have regained an additional 16 cu ft of storage added to front in former location of generator for a net loss of 21 cu ft of storage.
- h) Install auxiliary air compressor for tire inflation
 - Allows owners to have on board capacity to inflate vehicle front tires to 130 psi. Occupies 1.8 cu ft of under floor storage.

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- i) Modify trailer hitch tongue load from 1,850 pounds to 1,000 pounds (some units)
 - Reduced trailer tongue load capacity by 850 pounds on some units so all units will have a tongue rating of 1,000 pounds. Some of the subject units were originally manufactured with 1,000 pound tongue capacity. No change to the rating of the trailer hitch.
- j) Install 130 psi front tire inflation placard on dash
 - No effect on vehicle operation other than a front tire pressure reminder. (sample enclosed)
- k) Provide Owner's Manual addendums
 - Supplies information on tire care and inflation, on board tire inflation system instructions, vehicle loading information, relocated generator, and trailer hitch tongue load capacity. (samples enclosed)
- l) Add new vehicle certification label with 54,000 GVWR
 - Informs owners of GAWR's and increased GVWR to allow greater cargo carrying capacity. (sample enclosed)
- m) Provide decals for: 1) Operation of auxiliary air compressor, 2) Trailer hitch capacity, 3) Recommended tire inflation levels, and 4) Under floor storage bay load capacities
 - Owner information for air compressor operation, trailer tongue capacity, and tire inflation levels. Under floor storage bay capacities establish guidelines for loading the bays. Storage bay capacities were developed for each coach based on full fuel, ¼ tank of fresh water, and including weight for driver and passenger. Vehicles were weighed with owners belongings in the living area and loose items removed from the under floor storage bays. Each coach varies depending on option content and configuration. Also varies from coach to coach depending on how the owner has equipped the unit. Owners are free to load the vehicle however they choose (with full water if desired) as long as they are operated under gross axle weight ratings (GAWR) and gross vehicle weight rating (GVWR). (samples enclosed)
- n) Install larger capacity coolant reservoir on units with relocated generator
 - Increases coolant capacity for generator.
- o) Install larger capacity cooling fan and improve generator access on units with relocated generator

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- Increases cu ft of air flow to generator per generator manufacturer recommendation. Modification also improves maintenance access to inboard side of generator. Larger cooling fan takes up an additional 3.4 cu ft.
- p) Relocate generator power control box on units with relocated generator
- Installed in location in order to meet operating temperature requirements per generator manufacturer recommendation. Control box occupies .28 cu ft at top of storage bay.
- q) Remove steel generator support structure from front generator compartment on units that have relocated generator (some units)
- Removes additional 260 pounds from front of coach on heavier units. Additional frame reinforcements are also added where generator structure was removed. Six units do not have 16 cu ft front storage from generator relocation.
4. Describe the compromises, if any, which have been imposed on owners whose on-board generators had been relocated.

RESPONSE:

Compromise is loss of cubic foot of under floor storage where generator is relocated. In all but six units the net loss of under floor storage is 21 cu ft. Relocated generator does not have a slide-out feature since new location has access to entire outboard side of generator. In response to some owner's comments on the ability to access the relocated generator for maintenance, Blue Bird has modified the recall program to include adding an access panel to the inboard side of the generator box.

5. Identify all other compromises in vehicle use, function, and/or operation, if any, which have been imposed on owners by the remedial action(s) associated with 07V-586.

RESPONSE:

Reduced under floor storage space on units with relocated generator

Trailer hitch tongue load reduced on some units

Some owners have objected to Blue Bird's recommendation of traveling with ¼ tank of fresh water. Owners can travel with full tank of fresh water if they choose as long as coach is operated under the increased gross axle weight ratings (GAWR) and increased gross vehicle weight rating (GVWR) as a result of this recall.

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6. Describe the process that Blue Bird followed when weighing the subject vehicles (a) before and (b) after implementing the corrective actions identified in response to Request No. 1.

RESPONSE:

Process for weighing units was the same before and after recall work was completed. Units were weighed with full fuel and ¼ tank of fresh water. The majority of the units were weighed with customers personal belongings loaded in the above floor living area. Non-attached owner items were removed from under floor luggage bays prior to being weighed. As a result of the recall steps the owner has many options on how they load the vehicle. We have recently had the opportunity to weigh two empty (no owner belongings) coaches that have had all remedy actions completed. As mentioned earlier other vehicle weights were taken with owner belongings in the living space. The average cargo carrying capacity of these two coaches with full fuel, full fresh water, and two passengers is 3,672 pounds.

Several owners have expressed concern over a supposed reduction in cargo carrying capacity as a result of the remedy provided in this recall. Please note, however, that the remedy work performed on these vehicles did not result in reduced cargo carrying capacity. Although under floor storage was reconfigured on some units, as discussed above, the recall remedy actually increased the Gross Vehicle Weight Rating (GVWR) for each vehicle by 2,000 pounds, with a corresponding increase in cargo carrying capacity.

The issue of the relocated generator having adequate ventilation has also been raised. The generator manufacturer's updated specifications now call for increased cooling capacity. All units with relocated generators are being modified to include a larger cooling fan (549 cu ft min versus 965 cu ft min) as specified by generator manufacturer. We do not believe there is any risk of a fire or other safety concerns with units operating with smaller cooling fan. Work to install the larger cooling fan has been completed or scheduled on 45 of 51 units. The remaining units are being scheduled at owner convenience.

Blue Bird appreciates the opportunity to respond to these issues. Please feel free to call me at (478-822-2077) or e-mail at bruce.miles@blue-bird.com if you have any questions or would like to discuss any further details.

Sincerely,

Bruce Miles

Bruce Miles

Engineering Manager, Validation and Policy

Attachments

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REMEDIAL ACTIONS STATUS FOR CAMPAIGN 07V-586 Dec 16, 2009

Body #	Vin Number	a) New 17,000 # Tie Rods; Increase Front GAWR from 16,000 to 17,000 lbs.	b) New Michelin 315/80R22.5L XZA2 Front Tires @ 130 PSI	c) Align Front End	d) Increased GVWR by 2,000 lbs (Front by 1,000 and Drive by 1,000)	e) Install Hadley Air Leveling Cross Over Kit and Reprogrammed Module	f) Set Air Governor to 130 PSI	g) Relocate Generator from Front to Third Bay	h) Install Air Compressor For Tire Inflation	i) Modified Trailer Hitch Tongue Load Capacity	j) 130 PSI Tire Inflation Placard for Dash	k) Owner's Manual addendums	l) Vehicle Certification Label (54,000# GVWR)	m) Decals for 1) Air compressor, 2) Trailer Hitch Capacity, Storage Bay Capacities	n) Install Larger Surge Tank for Generator Relocated	o) Install Larger Capacity Cooling Fan and Improve Generator Access On Units With Generator Relocated	p) Relocate Generator Relocated	q) Remove Steel Structure From Front Generator Compartment on Units With Generator Relocated
1	37 1BBCRB2805W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
2	275 1BBCRB2885W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
3	276 1BBCRB895W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
4	277 1BBCRB805W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
5	278 1BBCRB825W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
6	279 1BBCRB845W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
7	280 1BBCRB865W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
8	281 1BBCRB2895W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
9	282 1BBCRB8X5W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
10	283 1BBCRB815W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
11	284 1BBCRB885W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
12	285 1BBCRB8X5W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
13	286 1BBCRB815W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
14	290 1BBCRB895W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
15	291 1BBCRB805W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
16	292 1BBCRB825W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
17	293 1BBCRB845W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
18	294 1BBCRB805W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
19	297 1BBCRB865W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
20	298 1BBCRB885W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
21	305 1BBCRB816W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
22	306 1BBCRB836W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
23	307 1BBCRB856W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
24	308 1BBCRB816W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
25	309 1BBCRB836W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
26	310 1BBCRB856W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
27	355 1BBCRB816W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
28	356 1BBCRB836W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
29	357 1BBCRB856W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A
30	358 1BBCRB816W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	N/A

Unit Scrapped

REMEDIAL ACTIONS STATUS FOR CAMPAIGN 07V-586 Dec 16, 2009

[illegible]