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R. L. Van Laar
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July 1, 2010

Ref.: NVS-215aa
EQ 10-003

Navistar Inc. is responding to your letter EQ10-003 originally dated 4/2/10, received in this office on 6/29/10 regarding Indiana Mills & Manufacturing, Inc. (IMMI) reporting of a noncompliance to FMVSS 222 for a seat cushion retention locking mechanism in certain seat assemblies. Note that your original letter and follow-up letter, dated 6/17/10, were addressed to IC Corp of Oklahoma and IC Corp. in Arkansas. It should be noted that these entities are manufacturing locations only and do not have the personnel to respond to this request.

Navistar has learned that our Tulsa Bus Plant worked closely with IMMI back at the time this issue was discovered. All vehicles built at this location were corrected by 2/2/10. The repair involved installing a guide bracket which positively locates the locking mechanism relative to the latch position. A total of 73 CE bus models were completed with this accepted remedy.

Therefore, because all buses built with the suspect latch have had the guide bracket installed Navistar does not plan to file a defect information report regarding the IMMI seat cushion locking mechanism. We trust this letter addresses your concerns regarding the installation of this seat in the CE Bus model and apologize for the late response to this letter.

The undersigned should be contacted for any additional information regarding this issue on (260) 461-1890.

Sincerely,

R. L. Van Laar

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Compliance Manager
Navistar, Inc.

RV:ta