KME KOVATCH

January 3, 2011

JAN -5 2012

Mr. Bruce York, Chief
Medium & Heavy Duty Vehicle Division
Office of Defects Investigation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: PE11-027; NVS-214
KME Aerial controller

Dear Mr. York:

I am writing on behalf of Kovatch Mobile Equipment Corp. (KME) in response to your letter of September 14, 2011, concerning the above-referenced matter, which involves the possible unintended movement of the aerial device on certain KME aerial ladder/platform trucks.

This will acknowledge that, while KME has not been successful in attempts to duplicate the problem, we have been able to acquire enough anecdotal information to confirm that the issue exists and should be addressed.

KME has determined, with the assistance of vendors associated with the components in question, that the subject vehicles are all KME aerial trucks manufactured in the 2004 model year or later that have (a) manual/hydraulic controls at the turntable AND (b) electric controls on the platform/ladder supplied by Parker Hannifin Corp.

While we have not yet been able to determine the actual failure mechanism or cause of the problem, we have been able to determine that the issue of unintended movement of the aerial ladder/platform can be prevented by making certain modifications to the controller programming/operational parameters.

Under the circumstances, KME will undertake a safety recall campaign on a voluntary basis in order to implement the proposed corrective action, upon approval of your office.

Kovatch Mobile Equipment Corp. – d/b/a KME Fire Apparatus
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Attached is a list of vehicles that are subject to this recall. We believe that all subject vehicles have been identified, although all requested information about all of the vehicles is not yet available, as we continue to retrieve and compile same.

The following is a summary of KME's proposed corrective action with regard to the subject vehicles in connection with this campaign:

1. Connect laptop computer with controller programming software to subject vehicle and run diagnostic check for codes;
2. Check "dead band" setting, adjusting it to 10% if setting is found to be less than that;
3. Perform programming modification to lock out aerial platform joystick controller immediately in the event of the presence of a command signal upon actuation of the dead man's switch;
4. Perform programing modification to disable all platform aerial movement controls immediately upon actuation of the dead man's switch at the turntable.

KME has established that the actions set forth in Nos. 2-4 above will prevent the occurrence of unintended aerial ladder/platform movement upon actuation of the dead man's switch. Therefore, we have a high degree of confidence that the successful completion of the proposed recall campaign will completely eliminate the defect in 100% of the subject vehicles.

KME hereby provides the following specific information with regard to the proposed campaign:

a. Action title or identifier: KME Aerial Controller Recall Campaign 1/12
b. Planned start date: January 18, 2012
c. Expected end date: May-June 2012 (estimated)
d. Summary of subject and objective of the action: As set forth above
e. Engineering groups/suppliers responsible for designing and for conducting the action: Parker Hannifin Corp. and AFP Industries, Inc. with cooperation of KME engineering staff/customer service.
f. Summary of the findings/conclusions resulting from the action: None yet.

KME expects to be able to provide additional information shortly, and will provide updates as appropriate.

In the meantime, please feel free to contact me with any questions or concerns in regard to this matter or in regard to this response.

Very truly yours,

STEVEN M. CORMIER
General Counsel

CC: Peter Kivett

PRODUCTION DATA										
GSO	VIN	Make	Model	Model Year	Date of Manufacture	Manufacture of Aerial Platform	Manufacture of Aerial Platform Control System	Warranty Start Date	State of Original Delivery	
1828										Roanoke refurb
2760										Roanoke refurb
3065										
5133									MI	
5135									PA	
5137									WV	
5520									MI	
5618									MA	
5689									GA	
5754									PA	
5761									NY	
5777									CT	
5795									NC	
5856									MA	
5866									PA	
5881									NY	
5931									OH	
6013	1K9AF64886N[redacted]	KME	Aerial	2006				10/25/2007	MA	
6034									Ontario, Canada	
6063	1K9AF4285BN[redacted]	KME	Midmount						VA	
6080	1K9AF648X6N[redacted]	KME	Aerial	2006					OH	
6087									NJ	
6131	1K9AF64886N[redacted]	KME	Aerial	2006	Dec-05				AL	
6132	1K9AF64816N[redacted]	KME	Aerial	2006	Jan-06			5/23/2006	IL	
6137	1K9AF42886N[redacted]	KME	TDA	2006	May-06			11/8/2006	CA	
6138	1K9AF64866N[redacted]	KME	Aerial	2006					GA	
6142	1K9AF648X6N[redacted]	KME	Aerial	2006	Dec-05				MI	
6234	1K9AF42847N[redacted]	KME	TDA	2007	May-07			7/2/2007	PA	
6249	1K9AF64816N[redacted]	KME	Aerial	2006	Mar-06			6/6/2006	MA	
6250	1K9AF64867N[redacted]	KME	Aerial	2007	Jun-06				NY	
6351	1K9AF64877N[redacted]	KME	Midmount	2007	Apr-06			5/18/2006	IN	
6363	1K9AF64847N[redacted]	KME	Midmount	2007	Jul-06			8/28/2006	IL	
6378	1K9AF64867N[redacted]	KME	Aerial	2007	Sep-06				FL	
6453	1K9AF64874N[redacted]	KME	Aerial	2007	Nov-06				NC	

6475	1K9AF64837N	KME	Midmount	2007	Jan-07			1/23/2007	PA
6566	1K9AF64837N	KME	Aerial	2007	Feb-07			4/27/2007	IL
6589	1K9AF64847N	KME	Midmount	2007	Apr-07			4/21/2007	NJ
6649	1K9AF64878N	KME	Aerial	2008	Jun-07			6/28/2007	MA
6677	1K9AF64878N	KME	Aerial	2008	Aug-07			8/28/2007	CT
6693	1K9AF64858N	KME	Aerial	2008	Jul-07			8/20/2007	PA
6741	1K9AF64838N	KME	Aerial	2008	Nov-07				NJ
6746	1K9AF64858N	KME	Aerial	2008	Oct-07			11/9/2007	NY
6751	1K9AF42819N	KME	Aerial	2009	Aug-08			9/25/2008	NY
6752	1K9AF64819N	KME	Aerial	2009	Sep-08			5/27/2009	NY
6753	1K9AF64858N	KME	Aerial	2008	Apr-08			5/30/2008	MA
6754	1K9AF64858N	KME	Aerial	2008				5/30/2008	MA
6757	1K9AF64888N	KME	Aerial	2008	Sep-07			9/12/2007	OH
6795	1K9AF42818N	KME	Aerial	2008	Mar-08			5/13/2008	NY
6802	1K9AF648X8N	KME	Aerial	2008	Oct-07			11/15/2007	IL
6815	1K9AF64848N	KME	Aerial	2008	Jan-08			2/14/2008	PA
6835	1K9AF64888N	KME	Aerial	2008	Feb-08			3/24/2008	NC
6860	1K9AF64888N	KME	Aerial	2008	Dec-07			12/21/2007	MI
6906	1K9AF64878N	KME	Aerial	2008	Feb-08			5/15/2008	AL
6955	1K9AF64888N	KME	Aerial	2008	Apr-07			6/12/2007	MI
6985	1K9AF64838N	KME	Aerial	2008	Apr-08			6/9/2008	PA
6989	1K9AF64878N	KME	Aerial	2008	May-08			6/17/2008	NJ
7036	1K9AF648X8N	KME	Aerial	2008	May-08			6/24/2008	TN
7072	1K9AF64839N	KME	Midmount	2009	Jun-08			6/27/2008	PA
7110	1K9AF64829N	KME	Midmount	2009	Aug-08			11/4/2008	SC
7111	1K9AF64889N	KME	Midmount	2009	Aug-08			10/21/2008	PA
7205	1K9AF64849N	KME	Aerial	2009	Sep-08			11/24/2008	MA
7222	1K9AF64879N	KME	Aerial		Dec-08				
7263	1K9AF64849N	KME	Midmount	2009	Nov-08			12/29/2008	OH
7285	1K9AF42809N	KME	Aerial	2009	Dec-08			1/23/2009	NJ
7308	1K9AF64869N	KME	Midmount	2009	Jan-09			3/24/2009	NJ
7323	IK9AF64839NC	KME	Aerial	2009	Feb-09			3/5/2009	PA
7336	1K9AF42869N	KME	Aerial	2009	Feb-09			3/17/2009	PA
7341	IK9AF64879NC	KME	Aerial	2009	Mar-09			4/16/2009	MA
7342	1K9AF64869N	KME	Aerial	2009	Mar-09			4/1/2009	OH
7349	1K9AF64829N	KME	Aerial	2009	May-09			6/25/2009	NY
7352	1K9AF64829NC	KME	Aerial	2009	May-09			6/12/2009	MA
7362	1K9AF64849N	KME	Midmount	2009	Jun-09			7/8/2009	MD

7374	1K9AF648X9N[redacted]	KME	Aerial	2009	Mar-09			4/29/2009	PA
7426	1K9AF6488AN[redacted]	KME	Midmount	2010	Jun-09			6/30/2009	Ontario, Canada
7446	1K9AF6483AN[redacted]	KME	TDA	2010	Jun-09			7/3/2009	PA
7462	1K9AF6484AN[redacted]	KME	Midmount	2010	Jul-09			8/17/2009	PA
7470	1K9AF6482AN[redacted]	KME	Aerial	2010	Jul-09			8/20/2009	NJ
7472	1K9AF6486AN[redacted]	KME	Aerial	2010	Aug-09			11/10/2009	NJ
7473	1K9AF4289AN[redacted]	KME	Aerial	2010	Aug-09			10/6/2009	NJ
7496	1K9AF6483AN[redacted]	KME	Midmount	2010	Sep-09			11/23/2009	NY
7504	1K9AF6489AN[redacted]	KME	Midmount	2009	Sep-09			10/30/2009	MI
7554	1K9AF4282AN[redacted]	KME	Aerial	2010	Nov-09			3/12/2010	IA
7555	1K9AF648XAN[redacted]	KME	Aerial	2010	Dec-09			4/30/2010	NC
7598	1K9AF6487AN[redacted]	KME	Midmount	2010	Aug-09			12/31/2009	PA
7622	1K9AF4289AN[redacted]	KME	Aerial	2010	Jan-10			8/16/2010	IN
7658	1K9AF648XAN[redacted]	KME	Aerial	2010	Oct-09			1/14/2010	OR
7659	1K9AF428XAN[redacted]	KME	Aerial	2010	Oct-09			2/2/2010	OR
7663	1M2AXI8CXAM[redacted]	MACK	GU813	2010	Nov-09			12/2/2009	PA
7685	1K9AF6488AN[redacted]	KME	Platform	2010	Jan-10			2/8/2010	TX
7725	1K9AF6483BN[redacted]	KME	Aerial	2011	May-10			9/3/2010	NY
7742	1K9AF6488BN[redacted]	KME	Aerial	2011	Apr-10			8/16/2011	Ontario, Canada
7748	1K9AF6480AN[redacted]	KME			Feb-10				DEMO
7749	1K9AF6484BN[redacted]	KME	Aerial	2011	Jul-10			4/29/2011	Ontario, Canada
7750	1K9AF6484BN[redacted]	KME	Aerial	2011	Jan-11			3/19/2011	SC
7779	1K9AF6486BN[redacted]	KME	Aerial	2011	Oct-10			11/5/2010	PA
7836	1K9AF4289BN[redacted]	KME	Aerial	2011	Aug-10			9/11/2010	NY
7842	1K9AF6483BN[redacted]	KME	Aerial	2011	Apr-10			5/10/2010	PA
7899	1K9AF4289BN[redacted]	KME	Aerial	2011	Jun-10			7/7/2010	NY
7917	1K9AF648XBN[redacted]	KME	Aerial	2011	Jul-10			9/15/2010	CA
7927	1K9AF6480BN[redacted]	KME	Aerial	2011	Jul-10			9/1/2010	WV
7933	1K9AF4280BN[redacted]	KME	TDA	2011	Sep-10			10/8/2010	NY
7964	1K9AF6481BN[redacted]	KME	Aerial	2011	Aug-10			11/4/2010	PA
8007	1K9AF6484BN[redacted]	KME	Aerial	2011	Oct-10			11/8/2010	OH
8029	1K9AF6482BN[redacted]	KME	Aerial	2011	Apr-11			7/5/2011	NY
8046	1K9AF428XBN[redacted]	KME	TDA	2011	Dec-10			1/6/2011	MA
8059	1K9AF6480BN[redacted]	KME	Midmount	2011	Dec-10			2/15/2011	NY
8062	1K9AF6487BN[redacted]	KME	Aerial	2011	Jan-11			2/4/2011	PA
8080	1K9AF648XBN[redacted]	KME	Aerial	2011	Feb-11				DEMO
8095	1K9AF6488BN[redacted]	KME	Midmount	2011	Feb-11			3/4/2011	Ontario, Canada
8096	1K9AF6486BN[redacted]	KME	Aerial	2011	Mar-11			4/11/2011	Ontario, Canada

8108	1K9AF6484CN	[redacted]	KME	Aerial	2011	Jun-11			6/29/2011	KY	
8125	1K9AF6480BN		KME	Aerial	2011	May-11			5/27/2011	IN	
8140	1K9AF4280CN		KME	TDA	2012	May-11			9/7/2011	GA	
8147	1K9AF6482BN		KME	Aerial						DEMO	
8148	1K9AF6485BN		KME	Aerial	2011	May-11			5/27/2011	PA	
8193	1K9AF6482CN		KME	Aerial	2012	Jul-11			8/22/2011	SC	
8252	1K9AF4283CN		KME	Aerial	2012	Jul-11			8/22/2011	IN	
8281											Roanoke refurb
8296	1K9AF4287CN		KME	Aerial	2012	Aug-11			9/16/2011	PA	
8479										SC	Roanoke refurb