



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

**APR 09 2012**

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via USPS Certified Mail**  
Warranty / Compliance Dept.  
TSE Brakes, Inc.  
2310 Industrial Drive SW  
Cullman, AL 35055

NVS-215aa  
EQ12-004  
12V-125

Re: Safety Recall 12V-125

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain brake chambers that a motorhome chassis manufacturer has decided not to comply with Federal Motor Vehicle Safety Standards (FMVSS) and could lead to personal injury or property damage. This investigation has been assigned the identification EQ12-004.

In a letter dated March 22, 2012, Spartan Motors Chassis, Inc. (Spartan) notified the NHTSA that it had decided a noncompliance exists in certain model year 2012 K2 and MG chassis manufactured from December 15, 2011, through January 31, 2012, and equipped with 3030 brake chambers. These vehicles fail to comply with the requirements FMVSS Number 121, "Air Brake Systems" because they do not meet the park brake and draw bar requirements. The park brake may not hold the vehicle in place and if the vehicle moves, injury or property damage could occur without warning. NHTSA assigned recall number 12V-125 to this matter. A copy of the respective notification is enclosed for your information.

Spartan reported to NHTSA that TSE Brakes, Inc. (TSE) manufactured the noncompliant brake chambers used in its motorhome chassis.

The purpose of this request is to obtain a list of purchasers that were sold these brake chambers so they are made aware of this safety recall and are able to determine the need for any similar safety recall. It is also to request TSE provide the requisite noncompliance report should it agree that it sold or distributed noncompliant motor vehicle equipment to vehicle manufacturers. It is further to ascertain whether TSE manufactured and sold or distributed any noncompliant equipment in the replacement market for which it may have responsibility for filing a report with NHTSA and conducting a recall campaign. Accordingly, we require the following information:



1. Provide a list of all customers that received the same or similarly affected TSE brake chambers and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.
2. State whether TSE manufactured and sold or distributed any equipment containing the noncompliance involved in the aforementioned recalls report in the replacement market and, if so, provide a list of all customers that received the same or similarly affected TSE brake chambers and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

Pursuant to Federal law, a manufacturer of motor vehicle equipment must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a FMVSS exists in that equipment. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the noncompliant equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report.

If your company does not agree with Spartan that these brake chambers do not meet the applicable FMVSS requirements, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

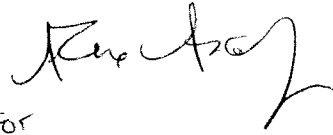
This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ12-004.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,



For

Jennifer Timian  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosure

**Spartan Motors Chassis, Inc.**

1000 Reynolds Road - Charlotte, MI - 48813

**DEFECT AND NONCOMPLIANCE REPORT - DOMESTIC**

<b>Description:</b>	Potential Noncompliance to FMVSS 121 Park Brake and Hill Hold Requirements
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<b>Internal Code:</b>	12005
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<b>Date of Report:</b>	3/22/2012
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**Submitted to:** Associate Administrator for Safety Assurance  
National Highway Traffic Safety Administration  
1200 New Jersey Ave. SE  
Washington, DC 20590

Attn: Mrs. Kelly Schuler, Office of Defects Investigation  
Fax: (202) 366-7882  
Email: RMD.ODI@dot.gov

**Manufacturer Identification:** Spartan Motors Chassis, Inc.  
1541 Reynolds Road  
Charlotte, MI 48813

Telephone: (517) 543-6400

**Corporate contact for recall information:**

Wesley D. Chestnut  
Compliance and Validation  
Spartan Motors, Inc.  
(517) 543-6400, ext. 3275  
Fax: (517) 543-7729  
Email: wdchestn@spartanmotors.com

Preparer's Signature:



**III. DESCRIBE THE DEFECT OR NONCOMPLIANCE**

**Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.**

The identified vehicles may not meet the park brake and draw bar requirements of section S5.6 of FMVSS 121 - Air Brake Systems.

**Describe the cause(s) of the defect or noncompliance condition.**

Pending

**Describe the consequence(s) of the defect or noncompliance condition.**

Under certain conditions the park brake may not hold the vehicle in place.

**Identify any warning which can (a) precede or (b) occur.**

If the vehicle moves a crash or property damage may occur without warning.

**If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address:**

Generic Component Name:	Brake Chamber
Supplier Part Number:	3030TLH2
Spartan Part Number:	0574-MM1-001
Supplier Corporate Name:	TSE Brakes, Inc.
Address:	2310 Industrial Drive SW Cullman, AL 35055
CEO or Knowledgeable Rep:	

**IV. PROVIDE THE CHRONOLOGY IN DETERMINING THE DEFECT/NONCOMPLIANCE**

**If defect, furnish a chronological summary with dates of all the principle events that were the basis for the determination of the defect. Include number of reports, accidents, injuries, fatalities, and warranty claims.**

**If noncompliance, identify and provide the test results or other data in chronological order with dates on which the noncompliance was determined.**

29NOV11 - During chassis validation, the suspect brake chambers were identified to potentially have lower output force than designed.

01DEC11 - Suspect brake chambers were sent to TSE for analysis.

11JAN12 - TSE determines the spring output force was at the minimum range of design thresholds.

12JAN12 - Engineering evaluations begin to determine if lower than designed output forces from the suspect brake chambers would be sufficient to hold vehicles of the various weight rating ranges in which the chamber is used.

02MAR12 - Engineers complete an initial review of previous test results and begin conducting required output force calculations in comparison to the actual measurements taken from the defective brake chambers.

15MAR12 - Engineering identifies a discrepancy in actual test results versus the measurements taken on the chambers.

20MAR12 - Engineering completes the evaluation and determine vehicles in the identified weight rating ranges may be at risk at not meeting the park brake and drawbar requirements of FMVSS 121 if the chassis was equipped with the suspect, defective brake cans.

22MAR12 - Compliance notifies the NTHSA of the noncompliance.

**V. IDENTIFY THE REMEDY**

**Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.**

**Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.**  
Components that are not a part of the recall are marked with a date code. Suspect chambers are within a certain date code when suspect springs were used.

**Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.**  
Inspection criteria at TSE was modified to detect brake chambers that may be providing an output force that is on the low end of the design requirements.

**VI. IDENTIFY THE RECALL SCHEDULE**

**Furnish a schedule or agenda, with specific dates, for notification to other manufacturers, dealers/retailers, and purchasers. Please identify any foreseeable problems with implementing this recall.**  
Pending

**VII. FURNISH RECALL COMMUNICATIONS**

**Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification.**

DOCUMENT DESCRIPTION	DATE AND MANNER SUBMITTED
Notification letter to other manufacturers	Pending
Draft Notification letter to purchasers	Pending
Press release (if applicable)	N/A
Recall Service Bulletin (RSB)	Pending
Notification Envelope	Pre-Approval

**The manufacturer's campaign identification number if not identical to the number**  
12-005