



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

DEC 10 2012

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail and Email

Mr. Henry Dangson
Senior Director of Quality
MGM Brakes
8530 Cliff Cameron Drive
Charlotte, NC 28269-9786

NVS-215aa
EQ12-011
12V-465
12V-518

Re: Multiple Safety Recalls Involving MGM Parking Brake Chambers

Dear Mr. Dangson:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain parking brake chambers that multiple vehicle manufacturers have decided contain a safety related defect that could lead a vehicle crash. This investigation has been assigned the identification EQ12-011.

On September 19, 2012, Navistar, Inc. (Navistar) notified the NHTSA that it had decided a defect exists in certain model year 2013 International 8600, 2012 and 2013 Durastar, 2011-2013 ProStar, and 2012 WorkStar trucks, manufactured from November 23, 2010, through April 02, 2012, and equipped with piston spring brake feature code 04EVP. The piston bore area of the parking brake chamber may have an air leak that could result in the parking brake not fully releasing. If the parking brake does not fully release, the service brakes may lock up without warning, increasing the risk of a crash. This matter was assigned recall number 12V-465.

On October 23, 2012, this same issue was reported by New Flyer Industries Ltd. (New Flyer) regarding certain model year 2010-2012 New Flyer transit buses. This matter was assigned recall number 12V-518. Both Navistar and New Flyer identified MGM Brakes as the manufacturer of the defective brake chambers. A copy of each respective recall notification is enclosed for your information.

The purpose of this request is to obtain a list of purchasers that were sold these parking brake chambers so they are made aware of this safety issue and are able to determine the need for any similar safety recall. It is also to request MGM Brakes provide the requisite defect report should it agree that it sold or distributed defective motor vehicle equipment to vehicle manufacturers. It is further to ascertain whether MGM Brakes manufactured and sold or distributed any defective 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 MGM parking 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 MGM Brakes manufactured and sold or distributed any equipment containing the defect involved in the aforementioned recalls reports in the replacement market and, if so, provide a list of all customers that received the same or similarly affected MGM parking 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 defective 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 Navistar and New Flyer that these parking brake chambers contain a safety related defect, 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 EQ12-011.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odj@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Timian', with a stylized flourish at the end.

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

Enclosures

RECEIVED

By Recall Management Division at 10:06 am, Sep 20, 2012

P: 331-332-1590
W: navistar.com

September 19, 2012

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington D.C. 20590

Subject: Defect Information Report (Initial)
Navistar Campaign 12524

Dear Associate Administrator:

This defect information report is submitted pursuant to Part 573.6(a).

(1) MANUFACTURER'S NAME [Part 573.6(c)(1)]

- Navistar, Inc for its INTERNATIONAL® brand trucks.

(2) IDENTIFICATION OF VEHICLES [Part 573.6(c)(2)]

- Vehicle Type / Make / Model / Model Year Involved:
 - Commercial Truck / INTERNATIONAL® / 8600 / 2013
 - Commercial Truck / INTERNATIONAL® / DuraStar® / 2012 and 2013
 - Commercial Truck / INTERNATIONAL® / ProStar® / 2011, 2012 and 2013
 - Commercial Truck / INTERNATIONAL® / WorkStar® / 2012
- Vehicle Manufacturing Dates:
 - 11/23/2010 thru 04/02/2012.
- Other Identification Necessary to Describe Vehicles:
 - Equipped with piston spring brake feature code 04EVP.

(3) COMPONENT MANUFACTURER [Part 573.6(c)(2)(iv)]

This report relates only to a component supplied by Indian Head Industries – MGM Brakes.
Contact information is:

Henry Dangson
Director of Quality
8530 Cliff Cameron Drive
Charlotte, North Carolina 28269
(704) 547-7411

(4) VEHICLE POPULATION INVOLVED [Part 573.6 (c)(3)]

Type	Make	Model	Number of Suspect Vehicles		
			United States	Canada	Export
Commercial Truck	INTERNATIONAL®	8600	23	0	0
Commercial Truck	INTERNATIONAL®	DuraStar®	16	2	0
Commercial Truck	INTERNATIONAL®	ProStar®	514	16	0
Commercial Truck	INTERNATIONAL®	WorkStar®	6	0	0

(5) PERCENTAGE OF VEHICLES ESTIMATED TO CONTAIN THE DEFECT [Part 573.6 (c)(4)]

- It is estimated that all (100%) of the vehicles in suspect population could have the defect.

(6) DESCRIPTION OF DEFECT [Part 573.6 (c)(5)]

- An internal design modification to the piston bore area of the piston in the spring brake chamber may in certain cases cause internal air leakage in the chamber.
- During release of the parking brake, an internal leak past the spring piston could result in the parking brake not fully releasing in some cases which could result in partial to full brake application.
- An unexpected application of the parking brake may contribute to a vehicle crash which may result in property damage, personal injury, or death.

(7) CHRONOLOGY OF PRINCIPAL EVENTS WHICH LED TO DETERMINATION OF A SAFETY DEFECT or TEST RESULTS THAT LED TO DETERMINATION OF NONCOMPLIANCE [Part 573.6 (c)(6)/(7)]

- 7/2/2012– Navistar Customer Service receives notice reporting a leaking piston in an MGM spring brake chamber.
- 7/17/2012 – Customer Service receives notice of additional leaks past the piston in the spring brake chamber.
- 7/25/2012 – Customer Service and MGM started working with select fleets to better understand issue.
- 8/10/2012 – Customer Service, Compliance, and MGM met to determine the scope, root cause, and severity of the issue in Navistar products.
- 8/15/2012 – Navistar completed determination of the total suspect population of vehicles built with suspect spring brake chambers.
- 8/23/2012 – Engineering, Compliance, and MGM met to discuss root cause and possible failure modes.
- 9/12/2012 – Navistar declares a safety recall.

(8) PROGRAM TO REMEDY DEFECT [Part 573.6 (c)(8)]

- The remedy will involve installation of a new spring brake chamber.

(9) PLAN FOR REIMBURSEMENT [Part 573.6 (c)(8)(i)]

- Navistar's plan for reimbursement of pre-notification remedies, on file and dated 1/5/09, applies and instructions will be included in the customer notification.

(10) SCHEDULE FOR RECALL NOTIFICATION [Part 573.6 (c)(8)(ii)]

- The schedule for recall notification is based on the availability of repair parts which cannot be determined at this time. However, a plan to mail an interim owner notification letter may be developed if the final remedy will not be available before 11/12/2012.

(11) MANUFACTURER'S CAMPAIGN NUMBER [Part 573.6 (c)(11)]

- 12524

The undersigned should be contacted for any additional information regarding this recall on (331) 332-1590.

Sincerely,



R. L. Van Laar
Compliance Manager
Navistar, Inc.

RV: FI

**NEW FLYER**

23 October 2012

VIA EMAIL and MAIL

Chief - Recall Management Division
US DOT – National Highway Traffic Safety Administration
Office of Defects Investigation (NVS-215)
1200 New Jersey Ave. SE,
Washington, DC 20590

Subject: New Flyer Safety Recall Declaration - MGM Integrated Guide Brake Chambers

To whom it may concern:

New Flyer Industries Canada ULC and New Flyer of America Inc. (together "New Flyer"), is declaring recall status with regards to reported failures of the integrated guide brake chambers which are designed and manufactured by Indian Head Industries Inc. / MGM Brakes ("MGM").

New Flyer has been working with MGM for almost a year to determine the root cause brake overheat issues experienced on New Flyer vehicles. It has been determined that MGM changed the internal design of the specific models of brake chamber used by New Flyer between November 2010 and December 2011, to the integrated guide design. These brake chambers may under certain conditions allow sufficient pressure to escape from the parking brake circuit to result in brake drag.

Brake drag causes thermal damage to brakes, brake system components and may result in fire.

New Flyer has not experienced any fires related to these overheat issues and with MGM's assistance has been actively campaigning those customers who may have this brake chamber design installed. Buses found to have the modified brake chamber design are retrofitted with a previous design of chamber which has not exhibited the same failure.

The new MGM design was to improve brake chamber performance at lower temperatures. Since the fit, form and function of this non-serviceable component remained the same, no modification of part number was made, and no end used notification was required from MGM. This has resulted in some difficulty identifying the specific New Flyer vehicles the subject chambers have been installed on. Of the brake chambers originally shipped to New Flyer, 56% have already been identified and replaced.

New Flyer will contact the customers who purchased buses identified as possibly having the subject chambers, and will continue to coordinate the retrofit campaigns with MGM.

New Flyer is filing the appropriate 573 defect report (see attached) and will manage all quarterly reporting for this recall.

If you have any further questions please contact me.

Sincerely,
NEW FLYER OF AMERICA INC.
NEW FLYER INDUSTRIES CANADA ULC

By: **Kerry Legg**
Vehicle Safety & Regulatory Compliance Manager
(204) 224-6706

Headquarters/
Winnipeg Facility
711 Kernaghan Ave.
Winnipeg, Manitoba
R2C 3T4 Canada
Ph: (204) 224-1251

Customer
Services
25 DeBaets St.
Winnipeg, Manitoba
R2J 4G5 Canada
Ph: (204) 982-8400

New Product
Development
Unit 7, 45 Beghin Ave.
Winnipeg, Manitoba
R2J 4B9 Canada
Ph: (204) 982-8413

Crookston
Facility
214 5th Ave. SW
Crookston, Minnesota
56716 USA
Ph: (218) 281-5752

St. Cloud
Facility
6200 Glenn Carlson Dr.
St. Cloud, Minnesota
56301 USA
Ph: (320) 203-0576

www.newflyer.com

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report¹

On 10 October 2012, New Flyer Industries Canada ULC [MFR] decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: 24 October 2012

Furnish the manufacturer's identification code for this recall (if applicable): R12-031

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

New Flyer Industries Canada ULC
Corporate Headquarters
711 Kernaghan Ave.
Winnipeg, MB Canada
R2C 3T4

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Mr. Kerry Legg
Vehicle Safety & Regulatory Compliance Manager
Telephone Number: (204) 224-6706

Fax No.: (204) 224-0248

Name and Title of Person who prepared this report.

Same as above.



Signed:

¹Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5227 or by FAX at (202) 366-7882.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall:

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): C35LFR

VIN Range: Beginning: 038625 **Ending:** 038629

VIN Range: Beginning: 039003 **Ending:** 039011

Vehicle Type: Heavy Duty Transit Bus **Body style:** Compressed Natural Gas Thirty Five Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): C40LF

VIN Range: Beginning: 038660 **Ending:** 038661

VIN Range: Beginning: 039460 **Ending:** 039582

VIN Range: Beginning: 039640 **Ending:** 039899

Vehicle Type: Heavy Duty Transit Bus **Body style:** Compressed Natural Gas Forty Foot Low Floor

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): C40LFR

VIN Range: Beginning: 038603 **Ending:** 038604

VIN Range: Beginning: 038662 **Ending:** 038664

VIN Range: Beginning: 038799 **Ending:** 038806

VIN Range: Beginning: 038891 **Ending:** 038916

VIN Range: Beginning: 038981 **Ending:** 039002

VIN Range: Beginning: 039202 **Ending:** 039221

VIN Range: Beginning: 039331 **Ending:** 039338

VIN Range: Beginning: 039443 **Ending:** 039451

VIN Range: Beginning: 039988 **Ending:** 039991

VIN Range: Beginning: 040094 **Ending:** 040104

Vehicle Type: Heavy Duty Transit Bus **Body style:** Compressed Natural Gas Forty Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): D35LFR

VIN Range: Beginning: 038795 **Ending:** 038798

VIN Range: Beginning: 040108 **Ending:** 040112

Vehicle Type: Heavy Duty Transit Bus **Body style:** Diesel Thirty Five Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011 - 2012

Model(s): D40LFR

VIN Range: Beginning: 038672 Ending: 038706

VIN Range: Beginning: 038790 Ending: 038794

VIN Range: Beginning: 039312 Ending: 039319

VIN Range: Beginning: 040241 Ending: 040295

Vehicle Type: Heavy Duty Transit Bus **Body style:** Diesel Forty Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011 - 2012

Model(s): D60LFR

VIN Range: Beginning: 038559 Ending: 038576

VIN Range: Beginning: 038665 Ending: 038665

VIN Range: Beginning: 038707 Ending: 038731

VIN Range: Beginning: 038756 Ending: 038758

VIN Range: Beginning: 039284 Ending: 039308

VIN Range: Beginning: 039321 Ending: 039330

VIN Range: Beginning: 039593 Ending: 039627

VIN Range: Beginning: 040113 Ending: 040118

Vehicle Type: Heavy Duty Transit Bus **Body style:** Diesel Sixty Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): DE35LFR

VIN Range: Beginning: 038630 Ending: 038631

Vehicle Type: Heavy Duty Transit Bus **Body style:** Diesel Electric Thirty Five Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): DE40LFR

VIN Range: Beginning: 038632 Ending: 308654

VIN Range: Beginning: 039012 Ending: 039031

VIN Range: Beginning: 039921 Ending: 039934

VIN Range: Beginning: 039996 Ending: 040008

Vehicle Type: Heavy Duty Transit Bus **Body style:** Diesel Electric Forty Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011 - 2012

Model(s): DE60LFR

VIN Range: Beginning: 038752 Ending: 038755

VIN Range: Beginning: 038807 Ending: 038822

VIN Range: Beginning: 038917 Ending: 038919

VIN Range: Beginning: 038950 Ending: 038980

VIN Range: Beginning: 040024 Ending: 040057

VIN Range: Beginning: 040159 Ending: 040223

Vehicle Type: Heavy Duty Transit Bus **Body style:** Diesel Electric Sixty Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2010 - 2011

Model(s): XD35

VIN Range: Beginning: 038226 Ending: 038242

VIN Range: Beginning: 039905 Ending: 039909

VIN Range: Beginning: 039975 Ending: 039975

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Diesel Thirty Five Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): XD40

VIN Range: Beginning: 038577 Ending: 038585

VIN Range: Beginning: 038759 Ending: 038789

VIN Range: Beginning: 039073 Ending: 039147

VIN Range: Beginning: 039339 Ending: 039375

VIN Range: Beginning: 039628 Ending: 039639

VIN Range: Beginning: 040071 Ending: 040084

VIN Range: Beginning: 040124 Ending: 040128

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Diesel Forty Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Make(s): New Flyer **Model Years Involved:** 2010 - 2011

Model(s): XDE35

VIN Range: Beginning: 038262 Ending: 038278

VIN Range: Beginning: 038586 Ending: 038587

VIN Range: Beginning: 040146 Ending: 040149

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Diesel Electric Thirty Five Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Make(s): New Flyer **Model Years Involved:** 2010 - 2012

Model(s): XDE40

VIN Range: Beginning: 038140 **Ending:** 038153

VIN Range: Beginning: 038491 **Ending:** 038542

VIN Range: Beginning: 038588 **Ending:** 038602

VIN Range: Beginning: 038920 **Ending:** 038926

VIN Range: Beginning: 039035 **Ending:** 039072

VIN Range: Beginning: 039222 **Ending:** 039222

VIN Range: Beginning: 039226 **Ending:** 039272

VIN Range: Beginning: 039309 **Ending:** 039311

VIN Range: Beginning: 039376 **Ending:** 039442

VIN Range: Beginning: 039583 **Ending:** 039592

VIN Range: Beginning: 040122 **Ending:** 040123

VIN Range: Beginning: 040150 **Ending:** 040153

VIN Range: Beginning: 040158 **Ending:** 040158

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Diesel Electric Forty Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Make(s): New Flyer **Model Years Involved:** 2011 - 2012

Model(s): XN40

VIN Range: Beginning: 039910 **Ending:** 039920

VIN Range: Beginning: 040090 **Ending:** 040093

VIN Range: Beginning: 040224 **Ending:** 040239

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Compressed Natural Gas Forty Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): XN60

VIN Range: Beginning: 039320 **Ending:** 039320

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Compressed Natural Gas Sixty Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents.

84.7 %

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Model	Year	Number of Vehicles Potentially Involved
C35LFR		14
C40LF		385
C40LFR		113
D35LFR		9
D40LFR		103
D60LFR0		123
DE35LFR		2
DE40LFR		70
DE60LFR		153
XD35		23
XD40		183
XDE35		23
XDE40		261
XN40		31
XN60		1

Total Number Potentially Affected by the Recall:

1494

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

67%

Identify and describe how the recall population was determined—in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

Sales and purchase orders of MGM brake chambers were reviewed to correlate receipt, and use in New Flyer production. Due to the inconsistencies with supply stock and usage, the recall population also includes buses from the same build order which were on the production line both before and after the time period specified. All vehicles will be inspected for applicable brake chamber date codes, to identify those brake chambers which will require replacement.

III. Describe the Defect or Noncompliance

5. 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.

Under certain intermittent conditions, brake chambers have been found to leak sufficient pressure from the parking brake circuit to allow for brake drag when the parking brake is supposed to be released.

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

Cause is believed to be related to modification of the internal seal of the spring brake chamber piston.

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

May produce brake drag at sufficient speed and duration creating an overheat condition, and can possibly result in fire.

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

Brake drag can and will result in smoking brakes due to overheated brake components.

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

MGM Brakes
Transit Business Unit
8530 Cliff Cameron Dr.
Charlotte, NC 28269

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Henry Dangson
Director Quality Assurance

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

In late October of 2011, New Flyer began receiving field reports from a single customer indicating hot brake conditions had been detected on a drum style rear brake system. New Flyer incorporated the engineering assistance of our axle and brake component suppliers in an effort to troubleshoot for root cause. Between that time and February of 2012, they explored the slack adjuster geometry, brake shoe design, brake lining composition, springs and hardware, brake retarder set-up and pressure, vehicle programming for retarder and interlock control, regional or environmental factors. No specific root cause was identified. Complicating the issue was the lack of similar or related occurrences at other nationwide locations operating buses with the same components and vehicle programming.

New Flyer installed data loggers, brake monitoring systems and modified control system software in an effort to prevent the events. By the 6th of February, twelve hot brake incidents had been recorded which escalated the issue to fleet defect proportions at that customer location. Brake chamber leakage seemed to be the primary cause.

On 22 February 2012, New Flyer attended the testing lab for MGM in an effort to replicate the failures. The following items remained as a focus, slack adjuster geometry, interlock function combined with park brake application and the affects of the assembly grease used in the chamber manufacture.

MGM also disclosed at this time that there had been an internal design modification to the MGM spring brake chambers which was incorporated into their production in November of 2010. The original design had a single lip seal and an O-ring guiding the piston within the bore of the chamber. The new design, replaced the seal and o-ring with a single larger integrated guide (seal). This design was proven to provide better sealing qualities at lower ambient temperatures (approaching -40 degrees F) than the original design. As there were no specific changes to the fit, form or function of the brake chamber, no changes to the component part number were made nor were any notifications sent to the end user.

MGM also made a decision to revert back to the original brake chamber design in December of 2011, once again no notifications were sent to end users. The concept of replacing the new brake chamber design with the exiting brake chamber design is explored, while continuing to review vehicle programming changes (modification of retarder function, interlock application and pressure, and anti-rollback features) and the incorporation of brake monitoring systems.

On 28 Feb 2012 New Flyer issues an instruction (ITS4919) to this customer to inspect and replace all rear brake chambers within specified date codes.

In March of 2012 New Flyer receives reports of hot brake incidents from four more customers. One of these is has vehicle with a disk brake design. Root cause analysis is conducted to determine if these events are related to the original. MGM commits to supplying replacement brake chambers of the original design for these campaigns.

Between April and June of 2012, two more disk brake equipped customers report hot brake conditions. New Flyer develops instructions to replace the brake chambers on disk brake equipped models. New Flyer and MGM review shipping and production records in order to determine which New Flyer customers are potentially effected during that year of production.

Final approval of both the instructions is delayed by customer approval process. ITS5094 was created for disk brakes for date codes from 112310 to 120611 (November 23 2010 to December 6, 2011), and ITS5095 was created for drum brakes for date codes from, 011211 to 121311 (January 12, 2011 to December 13, 2011). Both instructions are finalized and released in September of 2012, during the interim two more customers report hot brake events.

October 2012, New Flyer decides to declare recall and conduct inspections on all vehicles and fleets which were in production during the applicable time frame to determine if the brake chambers require replacement. The current listing includes 1494 buses bound for US consumers, and although it is anticipated that only 67% of these will actually have the suspect components installed, more vehicle may be added to the listing pending results of the inspections in the field.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

N/A

V. Identify the Remedy

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

Vehicles built within a specific date range will be inspected to determine the date coding on the rear (and center) axle brake chambers to determine if the brake chambers require replacement. Those disk brake chambers which were manufactured by MGM with date codes from 112310 to 120611 (November 23 2010 to December 6, 2011), and those drum brake chambers manufactured by MGM with date codes from, 011211 to 121311 (January 12, 2011 to December 13, 2011) will be replaced.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

MGM disk brake chambers (MGM part number MJB2024ET758) manufactured with date codes from 112310 to 120611 (November 23 2010 to December 6, 2011), and drum brake chambers (MGM part numbers MJS3024ET115 and MJS3024ET116) manufactured with date codes from, 011211 to 121311 (January 12, 2011 to December 13, 2011) will be replaced.

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.

New Flyer began receiving the originally designed brake chambers (correction for recall) for use in production in December of 2011.

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 the recall.

Recall notifications to owners will be sent out within 10 days of notification receipt of this document from the NHTSA Recalls Office, and the assignment of the Recall Code. New Flyer and MGM are currently already engaged recall preventative actions at many of our customer locations. At this time, of the 2233 chambers shipped to New Flyer approximately 57% have been identified and replaced.

VII. Furnish Recall Communications

9. 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 (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office electronically or by Fax (202-366-7882) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

RECEIVED

By Recall Management Division at 10:28 am, Dec 04, 2012

12V-518
(10 pages) Amended



NEW FLYER

3 December 2012

VIA EMAIL

Chief - Recall Management Division
US DOT – National Highway Traffic Safety Administration
Office of Defects Investigation (NVS-215)
1200 New Jersey Ave. SE,
Washington, DC 20590

Subject: Safety Recall 12V-518 - MGM Integrated Guide Brake Chambers

To whom it may concern:

New Flyer Industries Canada ULC and New Flyer of America Inc. (together "New Flyer"), has determined that the original recall population, as identified in the 573 defect report submitted to the National Highway Traffic Safety Administration (NHTSA) on 24 October 2012, was incorrect.

Recall population for 12V-518 has been reduced from 1494 vehicles to 1041 vehicles. New Flyer hereby submits a revision to the 573 defect report (attached).

If you have any further questions please contact me.

Sincerely,

NEW FLYER OF AMERICA INC.

NEW FLYER INDUSTRIES CANADA ULC

By: **Kerry Legg**
Vehicle Safety & Regulatory Compliance Manager
(204) 224-6706

Headquarters/
Winnipeg Facility
711 Kernaghan Ave.
Winnipeg, Manitoba
R2C 3T4 Canada
Ph: (204) 224-1251

Customer
Services
25 DeBaets St.
Winnipeg, Manitoba
R2J 4G5 Canada
Ph: (204) 982-8400

New Product
Development
Unit 7, 45 Beghin Ave.
Winnipeg, Manitoba
R2J 4B9 Canada
Ph: (204) 982-8413

Crookston
Facility
214 5th Ave. SW
Crookston, Minnesota
56716 USA
Ph: (218) 281-5752

St. Cloud
Facility
6200 Glenn Carlson Dr.
St. Cloud, Minnesota
56301 USA
Ph: (320) 203-0576

www.newflyer.com

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report¹

On 10 October 2012, New Flyer Industries Canada ULC [MFR] decided that a defect which relates to motor vehicle safety existed in the motor vehicles listed below, and furnished notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

NHTSA recall code assigned: **12V-518**

On 28 November 2012, New Flyer became aware that the original listing of vehicles identified for 12V-518 included many vehicles which were NOT affected by the subject recall. New Flyer hereby submits a revision to the original defect report, with a revised listing of effected vehicles.

Date the original report was prepared: 24 October 2012

Date the revised report was prepared: 3 December 2012

Furnish the manufacturer's identification code for this recall (if applicable): R12-031

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

New Flyer Industries Canada ULC
Corporate Headquarters
711 Kemaghan Ave.
Winnipeg, MB Canada
R2C 3T4

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Mr. Kerry Legg
Vehicle Safety & Regulatory Compliance Manager
Telephone Number: (204) 224-6706 Fax No.: (204) 224-0248

Name and Title of Person who prepared this report.

Same as above.



Signed:

¹Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5227 or by FAX at (202) 366-7882.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall:

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): C40LF

VIN Range: Beginning: 038660 **Ending:** 038661

VIN Range: Beginning: 039460 **Ending:** 039582

VIN Range: Beginning: 039640 **Ending:** 039899

Vehicle Type: Heavy Duty Transit Bus **Body style:** Compressed Natural Gas Forty Foot Low Floor

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): C40LFR

VIN Range: Beginning: 038891 **Ending:** 038916

VIN Range: Beginning: 039202 **Ending:** 039221

VIN Range: Beginning: 039988 **Ending:** 039991

VIN Range: Beginning: 040094 **Ending:** 040104

Vehicle Type: Heavy Duty Transit Bus **Body style:** Compressed Natural Gas Forty Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): D35LFR

VIN Range: Beginning: 040108 **Ending:** 040112

Vehicle Type: Heavy Duty Transit Bus **Body style:** Diesel Thirty Five Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): D40LFR

VIN Range: Beginning: 039312 **Ending:** 039319

Vehicle Type: Heavy Duty Transit Bus **Body style:** Diesel Forty Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): D60LFR

VIN Range: Beginning: 038665 **Ending:** 038665

VIN Range: Beginning: 039284 **Ending:** 039308

VIN Range: Beginning: 039593 **Ending:** 039627

Vehicle Type: Heavy Duty Transit Bus **Body style:** Diesel Sixty Foot Low Floor Restyled

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 011211 to 121311.

Make(s): New Flyer **Model Years Involved:** 2010 - 2011

Model(s): XD35

VIN Range: Beginning: 038226 Ending: 038242

VIN Range: Beginning: 039905 Ending: 039909

VIN Range: Beginning: 039975 Ending: 039975

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Diesel Thirty Five Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Make(s): New Flyer **Model Years Involved:** 2011

Model(s): XD40

VIN Range: Beginning: 038577 Ending: 038585

VIN Range: Beginning: 038759 Ending: 038789

VIN Range: Beginning: 039073 Ending: 039147

VIN Range: Beginning: 039339 Ending: 039375

VIN Range: Beginning: 039628 Ending: 039639

VIN Range: Beginning: 040071 Ending: 040084

VIN Range: Beginning: 040124 Ending: 040128

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Diesel Forty Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Make(s): New Flyer **Model Years Involved:** 2011 - 2012

Model(s): XN40

VIN Range: Beginning: 039910 Ending: 039920

VIN Range: Beginning: 040090 Ending: 040093

VIN Range: Beginning: 040224 Ending: 040239

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Compressed Natural Gas Forty Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Make(s): New Flyer **Model Years Involved:** 2010 - 2011

Model(s): XDE35

VIN Range: Beginning: 038262 Ending: 038278

VIN Range: Beginning: 038586 Ending: 038587

VIN Range: Beginning: 040146 Ending: 040149

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Diesel Electric Thirty Five Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Make(s): New Flyer **Model Years Involved:** 2010 - 2012

Model(s): XDE40

VIN Range: Beginning: 038140 **Ending:** 038153

VIN Range: Beginning: 038491 **Ending:** 038542

VIN Range: Beginning: 038588 **Ending:** 038602

VIN Range: Beginning: 038920 **Ending:** 038926

VIN Range: Beginning: 039035 **Ending:** 039072

VIN Range: Beginning: 039222 **Ending:** 039222

VIN Range: Beginning: 039226 **Ending:** 039272

VIN Range: Beginning: 039309 **Ending:** 039311

VIN Range: Beginning: 039376 **Ending:** 039442

VIN Range: Beginning: 039583 **Ending:** 039592

VIN Range: Beginning: 040122 **Ending:** 040123

VIN Range: Beginning: 040150 **Ending:** 040153

VIN Range: Beginning: 040158 **Ending:** 040158

Vehicle Type: Heavy Duty Transit Bus **Body style:** Xcelsior Diesel Electric Forty Foot

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Recalled vehicles have spring brake chambers with date codes between 112310 to 120611.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents.

59.1 %

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Model	Year	Number of Vehicles Potentially Involved
C40LF		385
C40LFR		61
D35LFR		5
D40LFR		8
D60LFR		61
XD35		23
XD40		183
XN40		31
XDE35		23
XDE40		261

Total Number Potentially Affected by the Recall:

1041

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

67%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

Sales and purchase orders of MGM brake chambers were reviewed to correlate receipt, and use in New Flyer production. In November of 2012 an audit of the Bill of Materials for vehicles identified in the original 573 defect report indicated that many vehicle models were incorrectly added to the recall population. Effected population size has been adjusted to reflect actual installations.

Due to the inconsistencies with supply stock and usage, the recall population also includes buses from the same build order which were on the production line both before and after the time period specified. All vehicles will be inspected for applicable brake chamber date codes, to identify those brake chambers which will require replacement.

III. Describe the Defect or Noncompliance

5. 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.

Under certain intermittent conditions, brake chambers have been found to leak sufficient pressure from the parking brake circuit to allow for brake drag when the parking brake is supposed to be released.

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

Cause is believed to be related to modification of the internal seal of the spring brake chamber piston.

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

May produce brake drag at sufficient speed and duration creating an overheat condition, and can possibly result in fire.

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

Brake drag can and will result in smoking brakes due to overheated brake components.

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

MGM Brakes
Transit Business Unit
8530 Cliff Cameron Dr.
Charlotte, NC 28269

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Henry Dangson
Director Quality Assurance

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

In late October of 2011, New Flyer began receiving field reports from a single customer indicating hot brake conditions had been detected on a drum style rear brake system. New Flyer incorporated the engineering assistance of our axle and brake component suppliers in an effort to troubleshoot for root cause. Between that time and February of 2012, they explored the slack adjuster geometry, brake shoe design, brake lining composition, springs and hardware, brake retarder set-up and pressure, vehicle programming for retarder and interlock control, regional or environmental factors. No specific root cause was identified. Complicating the issue was the lack of similar or related occurrences at other nationwide locations operating buses with the same components and vehicle programming. New Flyer installed data loggers, brake monitoring systems and modified control system software in an effort to prevent the events. By the 6th of February, twelve hot brake incidents had been recorded which escalated the issue to fleet defect proportions at that customer location. Brake chamber leakage seemed to be the primary cause.

On 22 February 2012, New Flyer attended the testing lab for MGM in an effort to replicate the failures. The following items remained as a focus, slack adjuster geometry, interlock function combined with park brake application and the affects of the assembly grease used in the chamber manufacture.

MGM also disclosed at this time that there had been an internal design modification to the MGM spring brake chambers which was incorporated into their production in November of 2010. The original design had a single lip seal and an O-ring guiding the piston within the bore of the chamber. The new design, replaced the seal and o-ring with a single larger integrated guide (seal). This design was proven to provide better sealing qualities at lower ambient temperatures (approaching -40 degrees F) than the original design. As there were no specific changes to the fit, form or function of the brake chamber, no changes to the component part number were made nor were any notifications sent to the end user.

MGM also made a decision to revert back to the original brake chamber design in December of 2011, once again no notifications were sent to end users. The concept of replacing the new brake chamber design with the exiting brake chamber design is explored, while continuing to review vehicle programming changes (modification of retarder function, interlock application and pressure, and anti-rollback features) and the incorporation of brake monitoring systems.

On 28 Feb 2012 New Flyer issues an instruction (ITS4919) to this customer to inspect and replace all rear brake chambers within specified date codes.

In March of 2012 New Flyer receives reports of hot brake incidents from four more customers. One of these is has vehicle with a disk brake design. Root cause analysis is conducted to determine if these events are related to the original. MGM commits to supplying replacement brake chambers of the original design for these campaigns.

Between April and June of 2012, two more disk brake equipped customers report hot brake conditions. New Flyer develops instructions to replace the brake chambers on disk brake equipped models. New Flyer and MGM review shipping and production records in order to determine which New Flyer customers are potentially effected during that year of production.

Final approval of both the instructions is delayed by customer approval process. ITS5094 was created for MGM type 2024 disk brake for date codes from 112310 to 120611 (November 23 2010 to December 6, 2011), and ITS5095 was created for type 3024 drum brakes for date codes from, 011211 to 121311 (January 12, 2011 to December 13, 2011). Both instructions are finalized and released in September of 2012, during the interim two more customers report hot brake events.

October 2012, New Flyer decides to declare recall and conduct inspections on all vehicles and fleets which were in production during the applicable time frame to determine if the brake chambers require replacement. Additional Instructions are created for variations of the MGM type 3024 drum brake chamber (Long Stroke, E Stroke, Etc.).

In late November 2012 an audit of the recall population as originally reported was conducted, and it was determined that the list of effected vehicles was reduced from 1494 to 1041. New Flyer submits a revision to the 573 Defect Report.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

N/A

V. Identify the Remedy

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

Vehicles built within a specific date range will be inspected to determine the date coding on the rear (and center) axle brake chambers to determine if the brake chambers require replacement. Those 2024 disk brake chambers which were manufactured by MGM with date codes from 112310 to 120611 (November 23 2010 to December 6, 2011), and those 3024 drum brake chambers manufactured by MGM with date codes from, 011211 to 121311 (January 12, 2011 to December 13, 2011) will be replaced.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

MGM type 2024 disk brake chambers manufactured with date codes from 112310 to 120611 (November 23 2010 to December 6, 2011), and MGM type 3024 drum brake chambers manufactured with date codes from, 011211 to 121311 (January 12, 2011 to December 13, 2011) will be replaced.

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.

New Flyer began receiving the originally designed brake chambers (correction for recall) for use in production in December of 2011.

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 the recall.

Recall notifications to owners have all been issued. New Flyer and MGM are currently already engaged recall preventative actions at many of our customer locations. At this time, of the 2233 chambers shipped to New Flyer approximately 57% have been identified and replaced.

For those customers who originally received recall notices for vehicles which are not affected, retraction notices have been issued.

VII. Furnish Recall Communications

9. 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 (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office electronically or by Fax (202-366-7882) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.