



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via USPS Certified Mail**

Ms. April Murray  
Stoughton Trailer Inc.  
416 S Academy Street  
Stoughton, WI 53589

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

**Subject: Safety Recall EQ12-011**

Dear Ms. Murray:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain MGM Brakes, Type 24 MGM J-Series piston parking brake chambers that the manufacturer has decided contain a safety related defect that could cause the brake chambers to lock up without warning, increasing the risk of a crash. This investigation has been assigned the identification EQ12-011.

The purpose of this letter is to make you aware of a potential safety problem in MGM Brakes, Type 24 MGM J-Series parking brake chambers and to remind you of your responsibilities under Federal law.

In a letter dated September 19, 2012, Navistar notified the NHTSA that it had decided a defect exists in certain Model Year (MY) 2013 International 8600, MY2012-2013 DuraStar, MY2011-2013 ProStar and MY2012 WorkStar trucks manufactured from November 23, 2010 through April 2, 2012. These vehicles were equipped with MGM J-Series piston spring parking brake chambers, 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. NHTSA assigned recall number 12V-465 to this matter. On October 23, 2012, New Flyer Industries, Ltd. reported the same issue with MGM parking brake chambers in certain MY2010-2012 New Flyer transit buses. NHTSA assigned recall number 12V-518 to this matter. A copy of both notifications is enclosed for your information.

MGM Brakes reported to NHTSA that it sold **5,998** of these defective units to Stoughton Trailer Inc. (your company) for possible installation into new motor vehicles, including trailer applications. The parts were shipped to your company, February 28, 2011, through March 20, 2012.



Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. 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. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective MGM J-Series piston spring parking brake chambers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree with Navistar and New Flyer that a defect exists in these MGM brake chambers, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

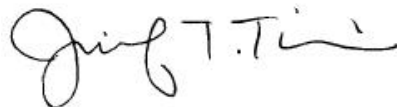
This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant 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 Cynthia Glass of my staff at (202) 366-2920 or by e-mail at [cynthia.glass@dot.gov](mailto:cynthia.glass@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,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with the first name being more prominent.

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

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via USPS Certified Mail**

Mr. Roy Heath  
Mertz Manufacturing, Llc  
1701 N. Waverly  
Ponca City, OK 74602

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

**Subject: Safety Recall EQ12-011**

Dear Mr. Heath:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain MGM Brakes, Type 24 MGM J-Series piston parking brake chambers that the manufacturer has decided contain a safety related defect that could cause the brake chambers to lock up without warning, increasing the risk of a crash. This investigation has been assigned the identification EQ12-011.

The purpose of this letter is to make you aware of a potential safety problem in MGM Brakes, Type 24 MGM J-Series parking brake chambers and to remind you of your responsibilities under Federal law.

In a letter dated September 19, 2012, Navistar notified the NHTSA that it had decided a defect exists in certain Model Year (MY) 2013 International 8600, MY2012-2013 DuraStar, MY2011-2013 ProStar and MY2012 WorkStar trucks manufactured from November 23, 2010 through April 2, 2012. These vehicles were equipped with MGM J-Series piston spring parking brake chambers, 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. NHTSA assigned recall number 12V-465 to this matter. On October 23, 2012, New Flyer Industries, Ltd. reported the same issue with MGM parking brake chambers in certain MY2010-2012 New Flyer transit buses. NHTSA assigned recall number 12V-518 to this matter. A copy of both notifications is enclosed for your information.

MGM Brakes reported to NHTSA that it sold **4,120** of these defective units to Mertz Manufacturing, Llc (your company) for possible installation into new motor vehicles, including trailer applications. The parts were shipped to your company, November 29, 2010, through March 28, 2012.



Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. 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. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective MGM J-Series piston spring parking brake chambers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree with Navistar and New Flyer that a defect exists in these MGM brake chambers, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

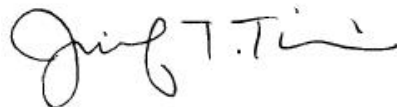
This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant 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 Cynthia Glass of my staff at (202) 366-2920 or by e-mail at [cynthia.glass@dot.gov](mailto:cynthia.glass@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,



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

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via USPS Certified Mail**

Mr. Don Hobbs  
Kentucky Manufacturing Co.  
7201 Logistics Drive  
Louisville, KY 40258

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

**Subject: Safety Recall EQ12-011**

Dear Mr. Hobbs:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain MGM Brakes, Type 24 MGM J-Series piston parking brake chambers that the manufacturer has decided contain a safety related defect that could cause the brake chambers to lock up without warning, increasing the risk of a crash. This investigation has been assigned the identification EQ12-011.

The purpose of this letter is to make you aware of a potential safety problem in MGM Brakes, Type 24 MGM J-Series parking brake chambers and to remind you of your responsibilities under Federal law.

In a letter dated September 19, 2012, Navistar notified the NHTSA that it had decided a defect exists in certain Model Year (MY) 2013 International 8600, MY2012-2013 DuraStar, MY2011-2013 ProStar and MY2012 WorkStar trucks manufactured from November 23, 2010 through April 2, 2012. These vehicles were equipped with MGM J-Series piston spring parking brake chambers, 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. NHTSA assigned recall number 12V-465 to this matter. On October 23, 2012, New Flyer Industries, Ltd. reported the same issue with MGM parking brake chambers in certain MY2010-2012 New Flyer transit buses. NHTSA assigned recall number 12V-518 to this matter. A copy of both notifications is enclosed for your information.

MGM Brakes reported to NHTSA that it sold **649** of these defective units to Kentucky Manufacturing Co. (your company) for possible installation into new motor vehicles, including trailer applications. The parts were shipped to your company, May 6, 2011, through October 28, 2011.



Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. 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. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective MGM J-Series piston spring parking brake chambers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree with Navistar and New Flyer that a defect exists in these MGM brake chambers, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

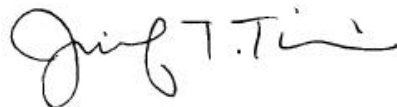
This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant 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 Cynthia Glass of my staff at (202) 366-2920 or by e-mail at [cynthia.glass@dot.gov](mailto:cynthia.glass@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,



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

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via USPS Certified Mail**

Mr. Phillip Ford  
Capacity Of Texas Inc.  
401 Capacity Drive  
Longview, TX 75604

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

**Subject: Safety Recall EQ12-011**

Dear Mr. Ford:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain MGM Brakes, Type 24 MGM J-Series piston parking brake chambers that the manufacturer has decided contain a safety related defect that could cause the brake chambers to lock up without warning, increasing the risk of a crash. This investigation has been assigned the identification EQ12-011.

The purpose of this letter is to make you aware of a potential safety problem in MGM Brakes, Type 24 MGM J-Series parking brake chambers and to remind you of your responsibilities under Federal law.

In a letter dated September 19, 2012, Navistar notified the NHTSA that it had decided a defect exists in certain Model Year (MY) 2013 International 8600, MY2012-2013 DuraStar, MY2011-2013 ProStar and MY2012 WorkStar trucks manufactured from November 23, 2010 through April 2, 2012. These vehicles were equipped with MGM J-Series piston spring parking brake chambers, 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. NHTSA assigned recall number 12V-465 to this matter. On October 23, 2012, New Flyer Industries, Ltd. reported the same issue with MGM parking brake chambers in certain MY2010-2012 New Flyer transit buses. NHTSA assigned recall number 12V-518 to this matter. A copy of both notifications is enclosed for your information.

MGM Brakes reported to NHTSA that it sold **84** of these defective units to Capacity Of Texas Inc. (your company) for possible installation into new motor vehicles, including trailer applications. The parts were shipped to your company, August 2, 2011, through September 1, 2011.



Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. 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. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective MGM J-Series piston spring parking brake chambers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
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Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree with Navistar and New Flyer that a defect exists in these MGM brake chambers, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

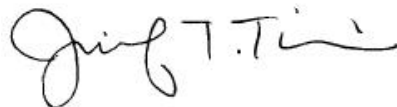
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Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with the first name being more prominent.

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

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via USPS Certified Mail**

Mr. Tom Langenfeld  
Great Dane Trailers  
2555 S. Blue Island Avenue  
Chicago, IL 60608

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

**Subject: Safety Recall EQ12-011**

Dear Mr. Langenfeld:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain MGM Brakes, Type 24 MGM J-Series piston parking brake chambers that the manufacturer has decided contain a safety related defect that could cause the brake chambers to lock up without warning, increasing the risk of a crash. This investigation has been assigned the identification EQ12-011.

The purpose of this letter is to make you aware of a potential safety problem in MGM Brakes, Type 24 MGM J-Series parking brake chambers and to remind you of your responsibilities under Federal law.

In a letter dated September 19, 2012, Navistar notified the NHTSA that it had decided a defect exists in certain Model Year (MY) 2013 International 8600, MY2012-2013 DuraStar, MY2011-2013 ProStar and MY2012 WorkStar trucks manufactured from November 23, 2010 through April 2, 2012. These vehicles were equipped with MGM J-Series piston spring parking brake chambers, 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. NHTSA assigned recall number 12V-465 to this matter. On October 23, 2012, New Flyer Industries, Ltd. reported the same issue with MGM parking brake chambers in certain MY2010-2012 New Flyer transit buses. NHTSA assigned recall number 12V-518 to this matter. A copy of both notifications is enclosed for your information.

MGM Brakes reported to NHTSA that it sold **6,097** of these defective units to Great Dane Trailers (your company): 6,050 units were shipped to your company on March 24, 2011, through December 5, 2011 for possible installation into new motor vehicles, including trailer applications; and, 47 units were shipped to your company on November 24, 2010, through January 3, 2012, for aftermarket sales.



Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. 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. Identify the units by type of use, (i.e. original equipment or aftermarket) and quantity of units. Additional content for the notification to NHTSA is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective MGM J-Series piston spring parking brake chambers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree with Navistar and New Flyer that a defect exists in these MGM

brake chambers, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

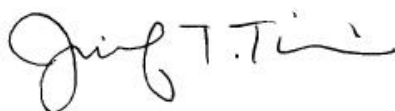
This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant 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 Cynthia Glass of my staff at (202) 366-2920 or by e-mail at [cynthia.glass@dot.gov](mailto:cynthia.glass@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,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with the first name being the most prominent.

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

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via USPS Certified Mail**

Mr. Timothy Lafon  
Volvo Trucks North America  
7900 National Service Road  
Greensboro, NC 27409

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

**Subject: Safety Recall EQ12-011**

Dear Mr. Lafon:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain MGM Brakes, Type 24 MGM J-Series piston parking brake chambers that the manufacturer has decided contain a safety related defect that could cause the brake chambers to lock up without warning, increasing the risk of a crash. This investigation has been assigned the identification EQ12-011.

The purpose of this letter is to make you aware of a potential safety problem in MGM Brakes, Type 24 MGM J-Series parking brake chambers and to remind you of your responsibilities under Federal law.

In a letter dated September 19, 2012, Navistar notified the NHTSA that it had decided a defect exists in certain Model Year (MY) 2013 International 8600, MY2012-2013 DuraStar, MY2011-2013 ProStar and MY2012 WorkStar trucks manufactured from November 23, 2010 through April 2, 2012. These vehicles were equipped with MGM J-Series piston spring parking brake chambers, 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. NHTSA assigned recall number 12V-465 to this matter. On October 23, 2012, New Flyer Industries, Ltd. reported the same issue with MGM parking brake chambers in certain MY2010-2012 New Flyer transit buses. NHTSA assigned recall number 12V-518 to this matter. A copy of both notifications is enclosed for your information.

MGM Brakes reported to NHTSA that it sold **2,242** of these defective units to Volvo Trucks North America (your company): 2,070 units were shipped to your company on November 23, 2010, through March 29, 2012 for possible installation into new motor vehicles, including trailer applications; and, 172 units were shipped to your company on December 20, 2010, through February 15, 2012, for aftermarket sales.



Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. 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. Identify the units by type of use, (i.e. original equipment or aftermarket) and quantity of units. Additional content for the notification to NHTSA is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective MGM J-Series piston spring parking brake chambers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree with Navistar and New Flyer that a defect exists in these MGM

brake chambers, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

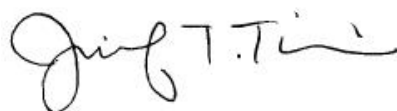
This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant 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 Cynthia Glass of my staff at (202) 366-2920 or by e-mail at [cynthia.glass@dot.gov](mailto:cynthia.glass@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,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with the first name being the most prominent.

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

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via USPS Certified Mail**

Mr. Charles Smith  
Meritor, Inc.  
2135 West Maple Road  
Troy, MI 48084

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

**Subject: Safety Recall EQ12-011**

Dear Mr. Smith:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain MGM Brakes, Type 24 MGM J-Series piston parking brake chambers that the manufacturer has decided contain a safety related defect that could cause the brake chambers to lock up without warning, increasing the risk of a crash. This investigation has been assigned the identification EQ12-011.

The purpose of this letter is to make you aware of a potential safety problem in MGM Brakes, Type 24 MGM J-Series parking brake chambers and to remind you of your responsibilities under Federal law.

In a letter dated September 19, 2012, Navistar notified the NHTSA that it had decided a defect exists in certain Model Year (MY) 2013 International 8600, MY2012-2013 DuraStar, MY2011-2013 ProStar and MY2012 WorkStar trucks manufactured from November 23, 2010 through April 2, 2012. These vehicles were equipped with MGM J-Series piston spring parking brake chambers, 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. NHTSA assigned recall number 12V-465 to this matter. On October 23, 2012, New Flyer Industries, Ltd. reported the same issue with MGM parking brake chambers in certain MY2010-2012 New Flyer transit buses. NHTSA assigned recall number 12V-518 to this matter. A copy of both notifications is enclosed for your information.

MGM Brakes reported to NHTSA that it sold **2,100** of these defective units to Meritor, Inc. (your company): 1,986 units were shipped to your company on December 2, 2010, through March 29, 2012 for possible installation into new motor vehicles, including trailer applications; and, 114 units were shipped to your company on February 3, 2011, through March 29, 2012, for aftermarket sales.



Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. 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. Identify the units by type of use, (i.e. original equipment or aftermarket) and quantity of units. Additional content for the notification to NHTSA is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective MGM J-Series piston spring parking brake chambers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree with Navistar and New Flyer that a defect exists in these MGM

brake chambers, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

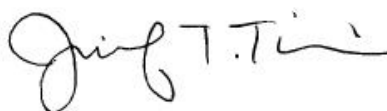
This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant 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 Cynthia Glass of my staff at (202) 366-2920 or by e-mail at [cynthia.glass@dot.gov](mailto:cynthia.glass@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,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with the first name being more prominent.

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

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via USPS Certified Mail**

Mr. Nasser Zamani  
Daimler Trucks North America  
2477 Deerfield Drive  
Fort Mill, SC 29715

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

**Subject: Safety Recall EQ12-011**

Dear Mr. Zamani:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain MGM Brakes, Type 24 MGM J-Series piston parking brake chambers that the manufacturer has decided contain a safety related defect that could cause the brake chambers to lock up without warning, increasing the risk of a crash. This investigation has been assigned the identification EQ12-011.

The purpose of this letter is to make you aware of a potential safety problem in MGM Brakes, Type 24 MGM J-Series parking brake chambers and to remind you of your responsibilities under Federal law.

In a letter dated September 19, 2012, Navistar notified the NHTSA that it had decided a defect exists in certain Model Year (MY) 2013 International 8600, MY2012-2013 DuraStar, MY2011-2013 ProStar and MY2012 WorkStar trucks manufactured from November 23, 2010 through April 2, 2012. These vehicles were equipped with MGM J-Series piston spring parking brake chambers, 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. NHTSA assigned recall number 12V-465 to this matter. On October 23, 2012, New Flyer Industries, Ltd. reported the same issue with MGM parking brake chambers in certain MY2010-2012 New Flyer transit buses. NHTSA assigned recall number 12V-518 to this matter. A copy of both notifications is enclosed for your information.

MGM Brakes reported to NHTSA that it sold **887** of these defective units to Daimler Trucks North America (your company): 591 units were shipped to your company on November 30, 2010, through March 29, 2010 for possible installation into new motor vehicles, including trailer applications; and, 296 units were shipped to your company on January 10, 2011, through October 3, 2011, for aftermarket sales.



Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. 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. Identify the units by type of use, (i.e. original equipment or aftermarket) and quantity of units. Additional content for the notification to NHTSA is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective MGM J-Series piston spring parking brake chambers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree with Navistar and New Flyer that a defect exists in these MGM

brake chambers, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

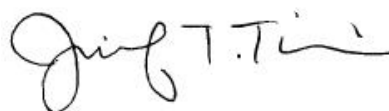
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Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ12-011.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at [cynthia.glass@dot.gov](mailto:cynthia.glass@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,

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

Enclosures