PE13-012

BENDIX

7/1/2013

Section 1

Explanation

Section 1 – Explanation of Response

The following provides additional information with regard to the sales data in response to Section 1:

- Bendix sells high level assemblies to OEM and Equipment Manufacturer customers. These assemblies consist of the caliper, carrier, pads and in most cases, the service chamber.
    - This assembly can be serviced with up to three Aftermarket part numbers. These part numbers were placed in the *Part_Number_Service_txt* field with a comma separating them.
    - Daimler Trucks North America (also referenced as Freightliner, DTNA, or Daimler) is the only OEM who purchases a caliper/carrier/pad assembly and a service chamber as separate components. Their caliper/carrier assembly parts can be used on either a steer or drive axle as the part numbers are the same. This applies only to DTNA part number K025426 and K025427 in the ADB22X-V family (see explanation below). Bendix does not receive records as to which axles Freightliner installs these assemblies. This means the actual quantity of the steer axle caliper/carrier assemblies for DTNA applications is only about 1/3rd of the totals listed in the tables. This estimate is using an assumption that the majority of the vehicles are 6x4, with a single steer axle and two drive axles.
    - Brake configurations / model may vary for the different OEM's. This can be seen in the attached sales summary.
        - ADB22X-V: vertically mounted carrier; DTNA is the only customer that uses the ADB22X-V.
        - ADB22X: axially mounted carrier; All other major OEM's use this version
        - SN-7: larger disc brake; Pierce, Reyco and Oshkosh use the SN-7
- In all cases, the Service_Version_Number_txt fields contain a, "#." Since the service parts are denoted with an , "AM," in the Application_Info_txt field, their individual revision levels are listed in the Production_Version_Number_txt field.

The last date the information was gathered was April 30, 2013.

PE13-012

BENDIX

7/1/2013

Section 2

Counts

The counts per the request in Section 2 are in the below table.

a. Consumer complaints, including those from fleet operators	41
b. Field reports, including dealer field reports	4
c. Reports involving a crash, injury or fatality;	0
d. Reports involving a fire;	15*
e. Property damage claims;	0
f. Third-party arbitration proceedings where Bendix is or was a party to the arbitration	0
g. Lawsuits, both pending and closed, in which Bendix is or was a defendant or codefendant	0

* The counts in item “d” are per the Early Warning regulatory definition. All of the 15 reports alleging fire are contained in either a customer complaint or a field report as counted above. In other words, of the 41 customer complaints, 14 alleged fire or fire and of the 4 field reports, 1 alleged fire. Explanations of the reports in item (d) are found in the attached file “Section 2 Summary Description of Item D Counts”.

.

PE13-012

BENDIX

7/1/2013

Section 2

Explanation

Section 2 – Explanation of Response

Bendix does not have a single, consolidated system to collect and record customer complaints. There are, however, a series of stand-alone processes that reside in different functions within the organization that collect this information from various contact points. Thus, a search was conducted over the documents that are most likely to contain such information. Documents included emails, weekly field reports, weekly fleet sales reports, and/or weekly aftermarket sales reports. The following key words or phrases were used in the search:

- Thermal overload or thermal incident
- Brake issue or brake drag
- Smoke or fire
- Excessive heat
- Burnt Rotor
- Accelerated wear at one wheel end
- Seized brake
- Drag or Dragging brake
- Caliper sticking or caliper stuck
- Warranty regarding the items above

The resulting population of documentation was then evaluated for any reference to the alleged defect of the subject components on the subject vehicles. There are complaints where, based on the lack of detailed information available, steer axle was not identified. These complaints are included in the counts as well as in the details provided in Sections 3 and 4.

The count provided in item (d) is a subset of the total counts provided in (a) and (b) which include a reference or allegation of fire per Early Warning regulatory definition.

The last date the information was gathered was June 4, 2013.

PE13-012

BENDIX

7/1/2013

Section 2

Summary Description For Item D

Summary Description For Item D

3a. Field ID	3b. Category	3c. Owner Fleet Name	Alleged Problem	Causal / contributing factors	Summary Assessment of Problem
100	Customer Complaint	Eagle Transport	As described by the Customer to Dealer in an email sent to the Bendix account representative: "...caliper on the passenger steer tire doesn't free float. This makes it pull and burns the brakes".	Torque plate machining	After investigation this appears to have been a machining issue by our supplier that caused the brakes to not slide freely and bind. This is not related to any over adjustments that may occur as a result of an alleged thermal overload. The caliper was received along with the torque plate. The engineering assessment showed a machined step (not to print) that was likely causing the binding.
102	Customer Complaint	Eagle Transport	As described by the Customer to Dealer in an email sent to the Bendix account representative: "Left front wheel end caught fire, used extinguisher."		Unclear as to actual problem with the brake. We received pictures that do not show evidence of a brake fire, however they do show evidence a fire extinguisher was used. Pictures can be found in supporting document 102-3.
104	Customer Complaint	Eagle Transport	As described in Bendix weekly field report: "Unit 9262, Roanoke VA, build date: 6/12; right front steer lock up, small fire reported" As described in warranty claim: WARRANTY CLAIM SAYS CHECK FOR WHEEL BRAKE LOCKUP drive axle		Received conflicting information regarding this customer complaint. Email received from the customer indicates small fire reported on right steer brake however warranty claim received for the associated VIN does not allege a fire and states "wheel brake lockup" on left drive axle with a different unit number. Working with customer to understand the specific complaint.

Summary Description For Item D

3a. Field ID	3b. Category	3c. Owner Fleet Name	Alleged Problem	Causal / contributing factors	Summary Assessment of Problem
110	Customer Complaint	Stewart Spreading	As described in warranty claim submitted by the Customer to OEM and provided to the Bendix account representative in email: "Left Steer Hub cap melted and leaking fluid everything. This disc is orange on outside. A couple of nut covers even started to melt."	Improperly adjusted during manufacturing (lower running clearance). Bendix plant sets the running clearance per a gage block when the brake is assembled; It may have been adjusted at the OEM truck factory or in service.	Warranty claim indicates "not inspected" and "policy allowed". This indicates a part most likely was not returned for inspection. Per Bendix account representative: recommended customer adjust brakes 3 clicks, customer adjusted current stock and no further reports of "TO" like events from the customer. All indications that brakes were improperly adjusted from customer factory (started with a low/no running clearance)

Summary Description For Item D

3a. Field ID	3b. Category	3c. Owner Fleet Name	Alleged Problem	Causal / contributing factors	Summary Assessment of Problem
113	Field Report	Waste Management	As described by the Customer to the Bendix account representative: left front (steer) position was locking up. Comments ranged between smoking and glowing red;	Bendix field investigation indicates the running clearance was tight, however not dragging at the time of inspection as the wheel could be freely turned.	Per Bendix SWAT field report: Bendix account representative visited Elliott/Wilson Capitol Truck to inspect a Waste Management truck that had a hot running ADB on one wheel end. Found left front wheel to showed signs of overheating. Checked the running clearance and the caliper did not feel like it was moving, however wheel did turn by hand indicating there was clearance. Attempted to check clearance with feeler gauges and was unable to insert a .010” all the way between pad and tappet or pad and rotor. Backed off adjustment remove pads check pad wear and movement of caliper on pins all within specifications. New caliper and pads where sent to the dealer to be replaced and old parts were returned to Engineering.
116	Customer Complaint	A Duie Pyle	As described by the Customer to Dealer in an email sent to the Bendix account representative: "Brake caliper R/S front seized and burnt up the pads"		Bendix Application Engineer requested images from the OEM of the pads, sides and edge of the rotor as well as brake in order to help determine if this is a case of thermal overload or high slide force. To date we have not received any further information regarding this complaint.

Summary Description For Item D

3a. Field ID	3b. Category	3c. Owner Fleet Name	Alleged Problem	Causal / contributing factors	Summary Assessment of Problem
121	Customer Complaint	D&D	As described by the Customer to Bendix Account Representative via telephone and via warranty claim: "Left Steer Brakes Locked Causing Fire"		The warranty claim indicates "not inspected" and "policy allowed". This indicates a part most likely was not returned for inspection. Bendix Account Representative investigated the report the following day after receipt of complaint and there was no evidence of any flame/fire. The ABS sensor and tappet boots were damaged from having experienced high heat. The rotor also had the orange discoloration. It was confirmed a fire extinguisher was used. The customer was satisfied with the feedback.
122	Customer Complaint	Peterbilt Mississauga	As described by the Dealer to Bendix Account Representative in an email: customer complaint is his steer axle brakes are getting so hot it is melting the wheel torque indicators off the unit	This likely indicates that the original assembly torques were not to spec. The assembly of the brake to the torque plate occurs at the OEM truck manufacturing facility.	Per Bendix Account Representative, the customer re-torqued the mounting bolts (brake to torque plate) to spec and checked that the caliper was floating on the guide pins after the torque and this corrected the issue
125	Customer Complaint	The Arms Trucking Company	As described by Customer in Service Request Detail Report provide to Bendix Account Representative: "Customer had to shoot wheel and brake with fire extinguisher on left steer axle to put out fire"	Wheel bearing failure	Bendix & Volvo inspection determined a wheel bearing failure caused the issue (See field sales team report in supporting document 125-1)

Summary Description For Item D

3a. Field ID	3b. Category	3c. Owner Fleet Name	Alleged Problem	Causal / contributing factors	Summary Assessment of Problem
126	Customer Complaint	City of NY Dept of Sanitation	As described by Customer in Service Request Detail Report provide to Bendix Account Representative: "ABS LIGHT ON, WE FIND THE TONER RING HAS WALKED OUT OF THE HUB, ALSO THE BRAKE PADS ARE FALLING APART, ROTOR IS SCORING , BOOT SEAL ON CALIPER PISTON MELTED"	Tone Ring Failure	Tone ring has walked out of the hub as a causal factor described directly by the customer in the complaint. We did not receive a part back for any further investigation.
128	Customer Complaint	Cumberland Farms	As described in warranty claim: "POLICY FOR CALIPER FREEZING CAUSING A FIRE. R/R CALIPER, SHOES, ROTOR AND WHEEL BEARING." As described by Customer to Bendix Account Representative "wheel fire on front axle equipped vehicle" and documented in email by Account Representative "thermal event was on a left-side steer (front) axle that caused a fire from a hydraulic tank on the engine. This was quickly extinguished by the driver."		There is evidence of the use of the fire extinguisher in pictures provided; however the brake is not discolored; Per the engineering evaluation: Caliper did not have orange/red tinge as is typical when a Thermal Overload event occurs. Black caliper paint looked as if there was some excess heat. Boots had the typical appearance and did not look heat damaged. The pictures are available in supporting document 128-3.

Summary Description For Item D

3a. Field ID	3b. Category	3c. Owner Fleet Name	Alleged Problem	Causal / contributing factors	Summary Assessment of Problem
129	Customer Complaint	Cumberland Farms	As described in warranty claim: TOWED IN, INSPECT LEFT FRONT WHEEL, EXCESSIVE OIL LEAK, FOUN D HUBCAP MELTED & CALIPER SEIZED. R&R HUBCAP & CALIPER, PROG GRESSIVE DAMAGE TO ROTOR & PADS, BURNT. R&I CHAMBER FOR AC CESSCLEAN OIL SOAKED CMNP. "	Not a Bendix part that was returned	Bendix Inspector Notes: this was not our part returned so could not investigate and therefore claim 12256-7662-P101 was rejected; no further investigation was performed nor any additional feedback received from the customer regarding the rejected claim
135	Customer Complaint	Penske	As described by Customer to Dealer and provided to Bendix Account Representative in an email: "Smell of Burning Brakes by the driver. ABS Light came up; no WE specified; pads were found to be crumbling and over heated and the wiring for the ABS sensor burned up, no insulation left on the wire."		There is no further information available, nor any warranty claim on file associated with this complaint.
136	Customer Complaint	Penske	As described by Customer to Dealer and provided to Bendix Account Representative in an email: Smell of Burning Brakes by the driver. ABS Light came up; no WE specified.		There is no further information available, nor any warranty claim on file associated with this complaint.

Summary Description For Item D

3a. Field ID	3b. Category	3c. Owner Fleet Name	Alleged Problem	Causal / contributing factors	Summary Assessment of Problem
142	Customer Complaint	Associated Wholesale Grocers	As described in Bendix weekly field report: "thermal event on left steer axle".		In the discussion with the Bendix representative, the driver had only discussed an issue of a hot brake with the Bendix Account Representative. The TO checklist was used and it appeared the caliper may have been over adjusting. The rotor was not replaced as it appeared to be in good condition.

PE13-012

BENDIX

7/1/2013

Section 3

Explanation

Section 3 – Explanation of Response

The search criteria and process is the same as in Section 2. Some of the requested data in the file "*INCIDENT DATA*" is not available. These data fields were left blank in the file. In addition, the *Subject component part number(s) and design version fitted as original equipment* (request item "f") is not available in almost all of the customer complaints or field reports, however we were able to denote the device name/description of the component.

Device Name Explanations

ADB22X – air disc brake with a carrier that mounts in the axial plane

ADB22X V – air disc brake with a carrier that mounts in the vertical plane (only used at Freightliner)

The last date the information was gathered was June 4, 2013.

.

PE13-012

BENDIX

7/1/2013

Section 4

Explanation

Section 4 – Explanation of Response

Each customer complaint or field report was given a unique identification in response to item (a), *Bendix's file number or other identifier used.* This is located in the "3a Field ID" column in the summary table in the file ***Incident Data***. Supporting documents were labeled, starting with the unique Field ID. These reports have been redacted for non-responsive content.

The method for organization is as follows:

- The "100" series reports under "3a Field ID" are Customer Complaints.
- The "200" series reports under "3a Field ID" are Field Reports.

  Example of the numbering convention used in the supporting documents:

  - "100 fw 9105.msg" is the document containing the actual customer complaint. "100-1 RE EAGLE9105-PARTS RETURN.msg" is a related support document to customer complaint / field report ID 100.
  - The second related support document is labeled "100-2 FW EAGLE TAMPA 9105 TORQUE PLATE ISSUE.msg".

The last date the information was gathered was June 4, 2013.

PE13-012

BENDIX

7/1/2013

Section 5

Explanation & Counts

Section 5 – Explanation of Response & Counts

The following provides additional information with regard to the warranty claim data response to Section 5:

- The requested non-confidential information is provided in electronic format in the file named "WarrantyData(PE13-012)."
    - This database contains two warranty data tables.
        - The table named, "tblWarrantyData – FRONT," contains warranty claims which stated that the alleged defect occurred on the steer axle of the vehicle.
        - The table named, "tblWarrantyData – UNKNOWN," contains warranty claims which did not clearly state that the alleged defect occurred on the steer axle of the vehicle.
- The requested confidential information is provided in electronic format in the file named "WarrantyData(PE13-012)_CONFIDENTIAL."
    - This database contains two warranty data tables.
        - The table named, "tblWarrantyData – FRONT_CONFIDENTIAL," contains warranty claims which stated that the alleged defect occurred on the steer axle of the vehicle.
        - The table named, "tblWarrantyData – UNKNOWN_CONFIDENTIAL," contains warranty claims which did not clearly state that the alleged defect occurred on the steer axle of the vehicle.
- Bendix cannot provide an accurate count of claims by subject component part number. Reasons are as follows:
    - There is not a direct relationship between sales part numbers (parts listed in response #1) and warranty parts received.
        - Bendix sells to OEM's high level wheel end assemblies that contain the subject components. Typically, a customer will only return the caliper, or caliper/carrier assembly if they believe the alleged defect exists.
        - There are cases where the label containing the returned part's number is missing or damaged. In this case, the exact part number cannot be determined, and would show as a '#' symbol or, 'UNDETERMINED,' in the data.

- Please find below a count of warranty claims for the listed categories which occurred on the steer axle:

Claim Category	*# Claims Accepted*	*# Claims Rejected*	*Total Claim Count*
Warranty Claims	33*	8	**41**
Extended Warranty Claims	0	0	**0**
Claims for Goodwill	2*	1*	**3**
Field/Zone or Similar Adjustments or Reimbursements	0	0	**0**
TSB or Campaign	0	0	**0**
GRAND TOTALS	**35**	**9**	**44**

*These counts represent standard, goodwill and claims paid as part of a commercial agreement. The claim detail for goodwill and commercial agreements are found in the table named, "tblWarrantyData – FRONT_CONFIDENTIAL," of our electronic submission.

- Please find below a count of warranty claims for the listed categories for which the axle was not able to be determined:

Claim Category	*# Claims Accepted*	*# Claims Rejected*	*Total Claim Count*
Warranty Claims	90*	21	**111**
Extended Warranty Claims	0	0	**0**
Claims for Goodwill	13*	0	**13**
Field/Zone or Similar Adjustments or Reimbursements	11*	0	**11**
TSB or Campaign	0	0	**0**
GRAND TOTALS	**114**	**21**	**135**

*These counts represent standard, goodwill and claims paid as part of a commercial agreement. The claim detail for goodwill and commercial agreements are found in the table named, "tblWarrantyData – FRONT_CONFIDENTIAL," of our electronic submission.

- Please note the following with regards to the warranty claim detail information:
    - Bendix does not routinely require all of the information requested in connection with warranty claims. For example, Bendix does not require the VIN of a vehicle involved in a warranty claim.
    - If a field contains the pound symbol, '#,' the requested data is not available or required by Bendix.

- The Bendix warranty system is based on the repairs made to a vehicle. One vehicle incident may result in multiple repairs, i.e. a thermal overload on one wheel end may require replacement of the caliper/carrier and service chamber. This would be denoted as two separate claims in the Bendix system, regardless of how the customer submitted their claim to us.
    - These claims could be determined by having the same VIN, repair dates and claim mileage.
- The last date the information was gathered was April 30, 2013.

PE13-012

BENDIX

7/1/2013

Section 6

Explanation

Section 6 – Explanation of Response

The following provides additional information with regard to the response to Section 6:

- Warranty claim search criteria:
    - The Bendix warranty system component hierarchy is as follows:
        - ***Center of Competency (CoC)*** – highest level of functional assemblies, i.e. Air Disc Brakes, Acutators, Electronics, Compressors, etc…
        - ***Device*** – A collection of like parts that serve a similar function, i.e. Mack OE ADB22X, ADB22X Aftermarket, Service Chambers, etc.. and is denoted by a *Device Code* and a *Device Code Description*
        - ***Part*** – Individual Part for a specific application and is denoted by a *Part Number* and a *Part Number Description*
    - The Bendix warranty system maintains three possible claim dispositions:
        - ***Defect*** – If a claim is accepted for payment and the returned part is not under any special customer agreement or warranty policy, it is assigned a *defect code* that describes why it failed.
        - ***Policy*** – If a claim is part of a special customer agreement or warranty policy, or is being accepted for reasons other than a failure, i.e. good will, etc…, it is assigned a *policy code* that describes why it was accepted.
        - ***Rejected*** – If a warranty claim is not accepted, it is assigned a *reject code* that describes why it was not accepted.
    - A large subset of non-cancelled warranty claims was generated by filtering all claims filed under the **Air Disc Brake** and **Actuator** CoC's.
        - This ensures all caliper/carrier assembly and chamber claims are captured.
    - The second subset of claims was filtered by using the following *Device Codes* that refer only to the subject components:
        - Device Codes and Descriptions
            - 07521 - SN-7SN7 CLP,PAD,ACT
            - 07541 - 225-CLP,PAD,ACT
            - 07545 - 22X-V-CLPR PAD
            - 07570 - 22X-CLPR PAD SC
            - 07576 - 22X-MACK CLPR PAD SC
            - 07550 – AIR DISC BRAKE ACTUATOR
            - 07592 – 22X MAINTENANCE KIT

        - Device code 07576 is the only device code that is both customer and steer axle specific. Device code 07570 is not customer specific, however it is steer axle specific. All other codes contain parts that could be installed on the drive axles of subject vehicles.

    - The third subset of claims was further filtered by the subject part numbers. See response to item 1 for part numbers and descriptions.

        - As mentioned in response 5, there are cases where a part was returned but its labeling was damaged or removed. These were included for the next evaluation.

        - As mentioned above in response 1, some of these parts could have been installed on a drive axle.

    - The final subset of claims was then evaluated, claim by claim, for any reference to the alleged defect and included, if found, in our electronic submission.

        - The Customer Comments and/or Tech Comments had to explicitly reference a thermal event, i.e. contain words like, but not limited to, stick, bind, drag, hot, thermal overload, etc. AND contain a reference to the steer axle, i.e. contain words like, but not limited to, steer, front, #1 axle, etc… These claims were included in the, "tblWarrantyData – FRONT," table.

            - If the claim was not specific to an axle, it was included in the, "tblWarrantyData – UNKNOWN," table.

- List of applicable Labor Operations and Problem Codes

    - Labor Operations

        - Bendix does not use or maintain specific Labor Operations as a characteristic of a warranty claim.

    - Problem Codes

        - The Bendix warranty system maintains three possible Problem Code types or claim dispositions:

            - ***Defect*** – If a claim is accepted for payment and the returned part is not under any special customer agreement or warranty policy, it is assigned a *defect code* that describes why it failed.
                - A *Defect Code* will be a 4 digit number with no prefix.

            - ***Policy*** – If a claim is part of a special customer agreement or warranty policy, or is being accepted for reasons other than a failure, i.e. good will, etc…, it is assigned a *policy code* that describes why it was accepted.

- A *Policy Code* is a 4 digit alphanumeric code with a, “P,” as its prefix

- ***Rejected*** – If a warranty claim is not accepted, it is assigned a *reject code* that describes why it was not accepted.
-
  - A *Reject Code* is a 4 digit alphanumeric code with an, “R,” as its prefix.

- The following *Problem Codes* are found in our electronic submission:

  - Defect Codes

    - 1340 – Seal Prob, Leakage
    - 3044 – Integrity Prob, Body Fractured
    - 5196 – Mechanical Prob, Inop
    - 5232 – Mechanical Prob, Seized

  - Policy Codes

    - P011 – Cannot test part
      - When Bendix warranty does not have the ability to properly confirm the customer’s complaint, we will pay the claim.

    - P018 – Negotiated Settlement
      - This is used when there is a negotiation made prior to settling a disputed claim.

    - P020 – Exception defined in notes
      - This is used when no other policy codes apply to a claim.

    - P024 – Engineering test request
      - This is used when engineering would like to perform a closer inspection of a warranty part.

    - P011 – Proof-of-Delivery
      - When Customer provides documentation that part was received by Bendix, however we cannot locate it for analysis.

    - P031 – Customer Agreement
      - When a long term agreement with a customer is different than the standard warranty policy, this code is used.

    - P033 – ADB Thermal Overload
      - Policy code, “P033,” was entered into the system May 2012 to facilitate tracking of any air disc brake thermal overload claims accepted. Prior to this date, claims relating to the alleged defect were coded with other policy or defect codes interchangeably.

- Reject Codes
    - R279 – Not our Part
        - A non-Bendix part was sent in for warranty
    - R384 – All Tests Passed to Spec
        - Part was evaluated, but met all necessary performance specifications.
    - R381 – Complaint not verified
        - Claim included specific compliant information but inspection results did not validate.
    - R544 – Damaged, but not by us
        - When a part was damaged, but not by a defect in material or workmanship.
    - R888 – Part not received
        - The failed part was not received for analysis.

- Bendix standard warranty policy and any extended warranty agreements for the subject components are located in our response to Section 7.

PE13-012

BENDIX

7/1/2013

Section 9

Explanation

Section 9 – Explanation of Response

All engineering changes are documented and controlled in our Product Life Cycle Management Tool. Each engineering change request / project is identified with a unique number (ECN or CR). The database was queried for all engineering changes related to the ADB22X / ADB22X-V, per the following:

- ADB22X / ADB22X-V OE customer level part numbers that were built with service brake chambers between January 2010 and May 2013.
- ADB22X / ADB22X-V OE customer level part numbers that were built without brake chambers between January 2010 and May 2013
- ADB22X / ADB22X-V internal caliper / carrier / pad / brake chamber part numbers
- ADB22X / ADB22X-V internal caliper / carrier / pad part numbers
- ADB22X / ADB22X-V internal caliper / carrier part numbers
- ADB22X / ADB22X-V internal caliper part numbers

In addition, the manufacturing plant was queried for changes with regard to manufacturing, quality control, and supply. Information with respect to items (a) through (h) above is summarized in the attached files noted in the cover letter.

Within the data file, the first tab contains a diagram to explain our product / part number structure. This demonstrates how a “caliper/carrier”, for example, relates to a final OE level customer part number. The second tab within the file summarizes the changes. The first column within this table is a Bendix unique identifier based on the project number the change was given in our engineering database (for design changes). This is for reference only. All planned changes per this section are noted with a date (item a) of “Future”.

Please note: item (h) – In the absence of a specific definition of “Interchangeable”, we have responded to the request from two perspectives:

1. Whether the component of the brake assembly that actually changed in design can be interchanged in the field with the prior version of the component.

2. Whether the new resulting brake assembly can be interchanged in the field with the prior version of the brake assembly.

The engineering changes on SN7 brake family sold by Bendix used a different search criterion. The SN7 brake assembly is purchased from our parent company in Germany and Bendix installs the brake chamber and provides this product to our OE companies. In this case the engineering change database was queried for all the changes related to the part numbers we purchase from Germany. These parts were searched for changes that relate to or may relate to the alleged defect in the subject vehicles.

Service chambers are purchased from a sister Knorr Bremse company. They are either sold by Bendix as an assembly on our disc brake or are sold loose (as noted in the response to Section 1). The engineering changes associated with the part number we purchase reside in the Product Life Cycle Management tool. These parts were searched for changes that relate to or may relate to the alleged defect in the subject vehicles.

The last date the information was gathered was June 27, 2013