Founded in 1852
by Sidney Davy Miller

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TEL (248) 879-2000
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October 21, 2014

SENT VIA EMAIL and OVERNIGHT MAIL

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation, Enforcement,
National Highway Traffic Administration
1200 New Jersey Avenue SE
Washington, DC 205590

Re: EQ14-012

Dear Ms. Timian:

My client, Williams Controls, has been forwarded a copy of your letter of October 16, 2014, that was sent to OEM/final assembly purchasers of certain Williams Controls WM-526 pedal assemblies in connection with EQ14-012. A representative copy of the letter is attached. On the first page of the letter, first sentence of the last paragraph, you state the following:

> "Williams reported to NHTSA that it sold [REDACTED] of these defective throttle pedal springs to [REDACTED] (your company) for possible installation into vehicles."

This incorrect statement requires a response by my client. First, Williams Controls did not sell "throttle pedal springs" to its customers; it sold WM-526 throttle pedal assemblies. This statement is confusing my client's customers. Second, and more important, Williams Controls takes issue with this statement because it strongly suggests that either Williams Control or NHTSA have determined that the WM-526 pedals at issue are "defective." Williams Controls has made no such determination and it is unaware of any such finding by NHTSA. In fact, Williams Control has informed NHTSA on several occasions that it believes the WM-526 pedals at issue are neither defective nor do they pose an unreasonable risk to motor vehicle safety. As the agency also knows, Williams Controls has also informed its customers of this belief as well, and provided to its

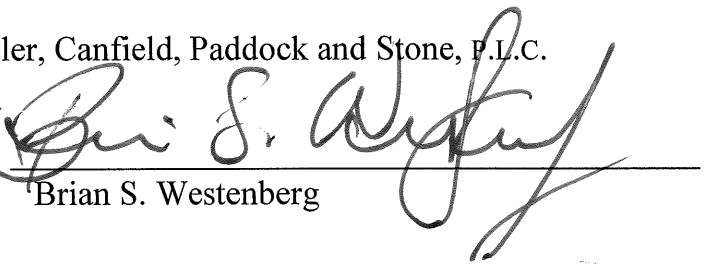
customers the factual support for this determination. (See the attached Part 579.5 External Communication filing of August 6, 2014.)

The purpose of this letter is to inform you that my client continues to believe that affected WM-526 pedals are not defective, notwithstanding language in your October 16, 2014, letter that is, at best, imprecise. I am also requesting that you post this letter to the public docket for EQ14-012.

My client looks forward to responding to your information request, which was received yesterday. In the meantime, should you have any questions please contact me.

Very truly yours,

Miller, Canfield, Paddock and Stone, P.L.C.

By: 

Brian S. Westenberg

BSW

Cc: Affected Williams Controls Customers

Westenberg, Brian S.

From:	Studer, Kurt <kstuder@curtisswright.com>
Sent:	Wednesday, August 06, 2014 10:20 AM
To:	tsb@nhtsa.dot.gov
Cc:	Westenberg, Brian S.
Subject:	Part 579.5 Submission for July, 2014
Attachments:	Notice to OEMs regarding WM-526.pdf; WM-526 Investigation Summary 130217 (3).pdf

Associate Administrator:

Attached please find a copy of my company's Part 579.5 external communications for the month of July, 2014. The recipients of the letter and the attachment are certain heavy-duty vehicle manufacturers that were previously identified on a customer list requested by Cynthia Glass (ODI). The customer list was submitted to the Chief Counsel's Office on July 18, 2014, with a request for confidentiality.

Please contact the undersigned if you have any questions.

Thank you.

Kurt J. Studer
Director of Quality

Curtiss-Wright Industrial
14100 SW 72nd Ave.; Portland, OR USA 97224
kstuder@curtisswright.com I www.cw-industrial.com
T: 503.684.3801 I M: 503.913.3292

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Industrial Division
14100 SW 72nd Ave
Portland, OR 97224, USA
T: +1.503.684.8600
www.cw-industrial.com

Name
Company
Address

July 29, 2014

REF: WM-526 Accelerator Pedals

Dear XXX,

As we discussed, Williams Controls investigated a potential condition with certain WM-526 accelerator pedals that were shipped worldwide in 2008. In February 2013, Williams Controls concluded its investigation and memorialized its findings in a report entitled "Field Complaint Analysis Report: Williams Controls WM-526 Complaints." A copy of this report is attached, which has been modified to redact an OEM's name. The report describes a condition of fractured springs found on certain WM-526 accelerator pedals detected by another OEM outside of the United States. It is believed the springs fractured due to local stress risers originating from pinched or lapped material on the radius edge of the spring likely caused by variation in the skiving process. The fractured springs identified were from production lots in November and December 2007 and the occurrences of fractured springs in non-U.S. markets were random and isolated.

There have been no reports of crashes or injuries associated with broken power springs in any WM-526 pedal. Williams Controls has received no reports in the U.S. of fractured WM-526 springs. In February, 2013, Williams Controls concluded that this condition did not present an unreasonable risk to motor vehicle safety in the United States. In October 2013 Prevost chose as a preventive measure to recall 32 pedals from the affected lot. No reports of failed springs have resulted from this campaign (13V 532). Gillig LLC decided to recall 98 aftermarket WM-526 accelerator pedals after learning about the Prevost recall, despite receiving no complaints of broken springs in WM-526 pedal from the affected lot. No reports of failed springs have resulted from this aftermarket parts recall campaign (14E-018). In June 2014, after receiving the recall reports from Prevost and Gillig, NHTSA informally contacted Williams Controls to inquire what other of its customers were sold WM-526 pedals from the affected spring lot. On July 18, 2014, Williams Controls supplied the sales information to NHTSA under a claim of confidentiality. This included sales to XXX. The specific WM-526 information we provided to NHTSA on sales to your company will be made available. We understand XXX has received no reports of spring fractures in any of vehicles equipped with a WM-526 pedal from the late 2007 production run. This is consistent with our findings that spring fractures are non-existent in the U.S. market.

To date, there have been no additional spring fractures reported by any of the over 100 customers around the world that bought WM-526 pedals produced with springs from the affected production lots. Williams Controls continues to believe that this condition does not present an unreasonable risk to motor vehicle safety in the United States. On July 21, 2014, NHTSA informed Williams Controls during a telephone call that it will open a formal Equipment Query and contact buyers of the WM-526 pedals identified by Williams Controls. Because your company purchased WM-526 pedals using the spring within the affected lots, you may be contacted by NHTSA and asked whether you have received reports of WM-526 failures of springs in the field and if so, are you intending to perform a safety recall.

Industrial Group – Williams Controls
Industrial Division
14100 SW 72nd Ave
Portland, OR 97224, USA
T: +1.503.684.8600
www.cw-industrial.com

If you require additional information or if we can be of further assistance, please do not hesitate to contact me.

Regards,

Kurt Studer
Director of Quality
Curtiss-Wright Industrial - Williams Controls
T: +1503-684-3801
E: kstuder@curtisswright.com

Williams Controls
14100 SW 72nd Avenue
Portland, Oregon 97224

Phone: 503-684-8600
Fax: 503-624-3812

Field Complaint Analysis Report

Williams Controls

WM-526 [redacted] Complaint

February 17, 2013

Executive Summary:

In October 2010, [redacted] reported a broken power spring on a WM-526 pedal from India. In December 2010, another broken spring was reported by [redacted] on a pedal from Ireland. Neither of these pedals was returned to Williams Controls (WMCO). Between October 2010 and August 2011, 21 claims of pedals with broken springs were submitted to WMCO from [redacted]. Examination of the broken springs indicated that 8 of the springs (including one pedal with 2 broken springs) fractured prematurely due to local stress risers originating from pinched or lapped material on the radius edge of the spring material. The lapped condition appears to have been present prior to the winding of the springs and was likely caused by variation in skiving.

From October 2011 through August 2012, WMCO proactively replaced 280 pedals at [redacted] on fleets in Ireland, the UK and Portugal. All of the pedals were returned and analyzed for spring fracture. From the field replacement pedals, 2 additional broken springs were found that fractured from a similar edge condition due to variation in skiving. There were also 10 springs identified that exhibited similar poor edge condition but were still in tact. While these 10 springs did not fracture, they were considered to be at risk of a premature fracture.

All of the fractured and at-risk springs have been traced to select production lots from the spring former from November and December 2007. From the same production lots, there have also been 32 good springs analyzed with acceptable edge formation that do not exhibit the pinched or lapped condition. The data suggests this issue was caused due to variation in the skiving operation isolated to a small batch of springs.

There have not been any additional spring fractures reported by [redacted] or any of the other 100+ customers around the world that bought WM-526 pedals produced with springs from these lots. There have been no reports of crashes or injuries associated with broken power springs on a WM-526 pedal.

Williams Controls will continue to closely monitor the field data on WM-526 pedal performance. Should any additional broken power springs be confirmed in the field, additional investigation will be undertaken.

Pedal Safety Design

The WM-526 electronic throttle control has been in production at Williams Controls for over 20 years. Over 2.5 million pedals have been shipped since 1999. The pedal is designed with redundant power springs for safety, reliability and compliance to FMVSS-124 Return to Idle regulation. The pedal is fully operational with one spring, although with a lower actuation force that would offer advanced warning to an operator. If both springs were to fail, it could result in the pedal not returning to idle. The vehicles from which the field complaints were submitted are [redacted] equipped with a Brake Throttle Override (BTO) system. The BTO system is a safety system that will cut fueling should the brake be applied at the same time as the accelerator.

Chronology of Events

The investigation of this issue has spanned from October 2010 through December 2012. A graphical timeline can be found in Appendix 1.

October 13, 2010	The first field complaint for a pedal with a broken spring was submitted by [redacted] to WMCO. The reported failure was in service in India. The pedal was not returned to WMCO for analysis.
December 3, 2010	The second field complaint for a pedal with a broken spring was submitted by [redacted] to WMCO from a bus in Ireland. The pedal was not returned to WMCO for analysis.
March 28, 2011	Two pedals with broken springs were returned from Ireland to WMCO for analysis.
August 30, 2011	7 [redacted] field complaints were received by WMCO, including one pedal with two broken springs. Broken springs are sent for analysis to an independent third party laboratory.
September 20, 2011	Material analysis report on broken springs is received from outside laboratory. The lab performed a range of analyses including visual inspection, scanning electron microscope (SEM), energy dispersive spectroscopy (EDS) examination and material hardness test. The report concluded that the broken springs failed from a variety of causes. The failures included fracture originating from a chlorine filled pit, weld splatter present on the spring, and 8 failures attributed to a pinched or lapped end. The pinched end is the result of variation in the skiving process that forms the rounded edges on the spring material after slitting and before spring winding.
October 28, 2011	In a proactive effort to gain more data, [redacted] and WMCO launch a joint effort to replace almost 200 pedals in the field at the bus fleet in Ireland. New pedals are supplied to replace those in service. The in service pedals are to be sent to WMCO for analysis.
March 12, 2012	The final shipment of replaced pedals is received at WMCO from Ireland. 193 pedals in total are replaced in the field. Upon receipt at WMCO, the pedals are systemically analyzed. The pedals are visually inspected, measured for mechanical characteristics, and disassembled for further visual inspection. The springs are visually inspected and the edge is screened using a cotton ball test. The test was recommended by an external export using the rationale that springs exhibiting the pinched edge condition would pull cotton fibers that would be visible to the naked eye. Any springs that pulled cotton fibers during this screening were sent to an outside lab for in depth analysis.

	From this study, 2 additional broken springs were found to be caused from variation in skiving. 34 springs were sent for analysis as a result of the cotton ball screening test. 10 springs were found to have edge condition that could be at risk for fracture, but none of these springs had actually fractured.
April 19, 2012	WMCO hires outside consultant to support investigation and statistical analysis of the issue.
June 8, 2012	To further understand the issue and collect additional data, a cooperative field survey is launched to replace pedals from the field in geographic regions outside of Ireland. WMCO supplied a range of chassis numbers based on the failed units. [redacted] identified 2 bus fleets with pedals suspected to be close to the same time range. The fleets in the UK and Portugal are sent replacement pedals to change out in service pedals for return to WMCO.
June 25, 2012	WMCO representatives visit supplier of raw material and witness skiving process.
August 5, 2012	47 pedals from a bus fleet in the UK are received by WMCO for field survey. All springs are intact and pass the cotton ball screening.
October 9, 2012	40 pedals from a bus fleet in Portugal are received and analyzed at WMCO. No additional skiving related fractures were found.

Skiving Process and Spring Failure

The in depth spring analysis revealed that on 10 of the fractured springs, and 10 at-risk springs, the edge of the spring material was characterized as having a pinched or lapped condition. In June 2012, WMCO visited the raw material supplier. The supplier receives sheets of the specified AISI 301 stainless steel material from the mill. The material is slit from the 24" wide master coil sheets to ribbons of the desired width. Skiving is performed to remove all burrs from slitting and produce the desired full round edge on the spring material. The skiving process is performed in two passes through carbide cutters in a submerged coolant bath at a speed of approximately 500 feet/minute. The material is monitored for width and camber prior to winding onto coils for shipment to WMCO spring formers.

This poor edge condition creates a local stress riser and a fracture origination point. The poor skiving on the edge of the spring material can be seen in Figures 1 and 2.

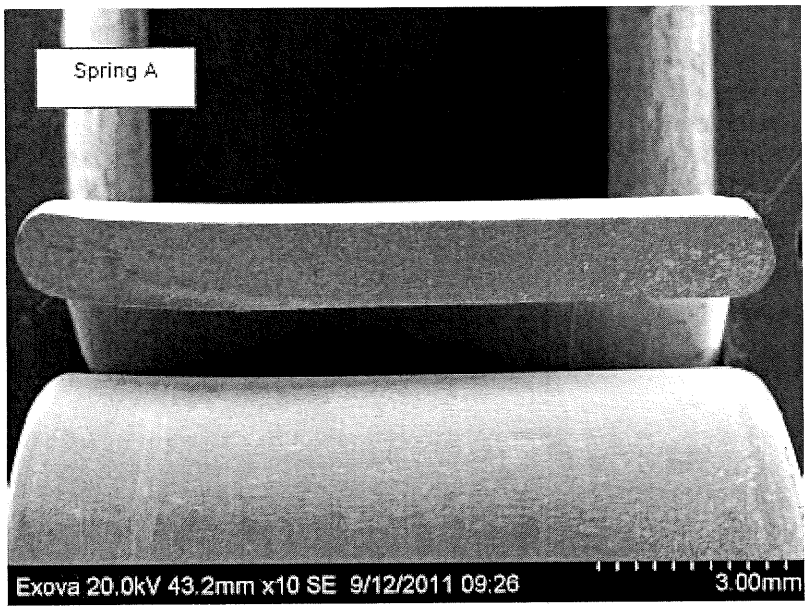


Figure 1: Spring from Ireland bus return. The red arrow shows the likely fracture origination point. Photo source report T116340.

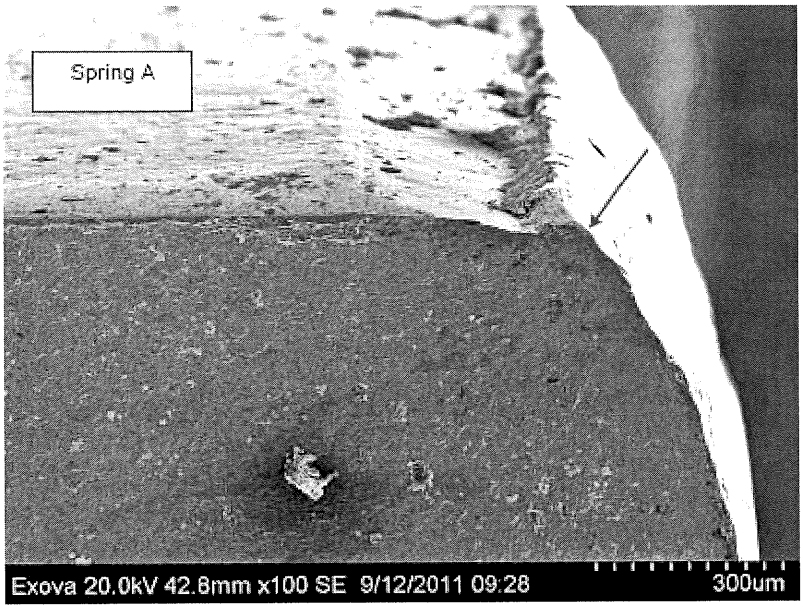


Figure 2: Spring from Ireland bus return. The red arrow shows the likely fracture origination point. Photo source report T116340.

The pedals with springs that fractured from variation in skiving had an average of 130,252 miles with a standard deviation of 27,585 miles. Statistics for the fractured springs can be found in Table 1.

Table 1: Mileage statistics for fractured and at-risk springs

	Mileage			
	Average	Min	Max	St Dev
Fractured Springs	**130,252**	**88,717**	**168,202**	**27,585**
At-Risk Springs	**117,927**	**22,958**	**168,824**	**82,316**

The summary of the fractured and at-risk springs can be found in Appendix 2.

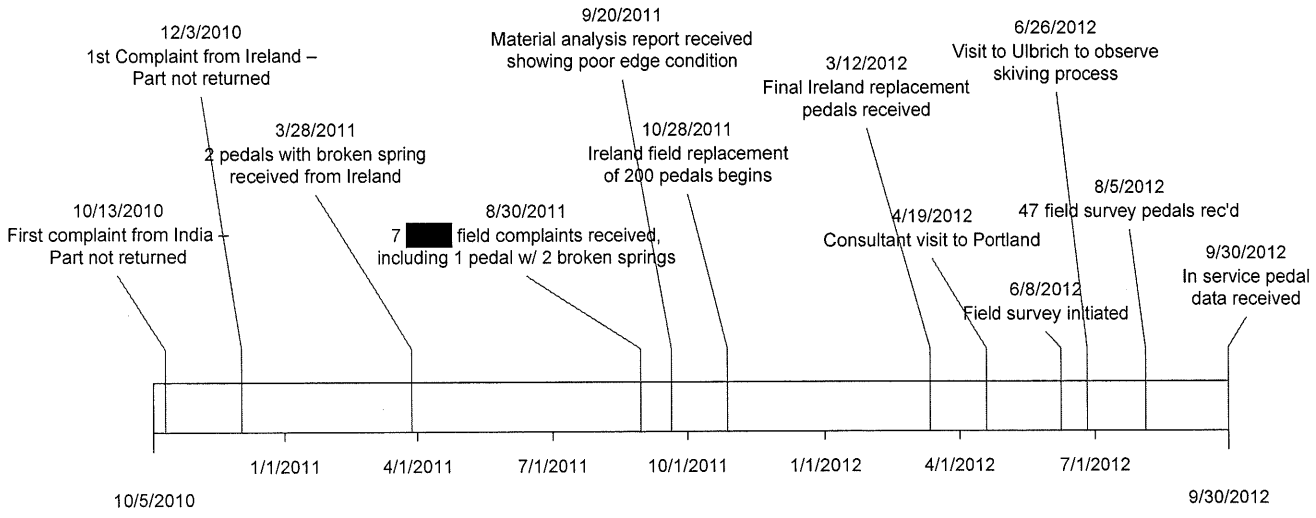
Ongoing monitoring

The confirmed spring conditions at [redacted] have been limited to 9 pedals with 10 broken springs (one pedal with two broken springs). Through the replacement pedal initiative and field survey, an additional 10 at-riskt springs have been identified but are in tact. All of the confirmed fractured and at-risk springs are found to have originated from spring lots from November or December 2007. Of the over 600 springs from the field that have been analyzed, an additional 32 springs from these production dates were examined and found to have no issue.

The WM-526 pedal platform is sold to over 100 customers all over the world in a variety of applications. No other field complaints of broken springs from this time period have been reported and there have been no reports of crashes or injuries associated with broken power springs on a WM-526 pedal.

Williams Controls will continue to closely monitor the field data on WM-526 pedal performance. Should any additional broken power springs be confirmed in the field, additional investigation will be undertaken.

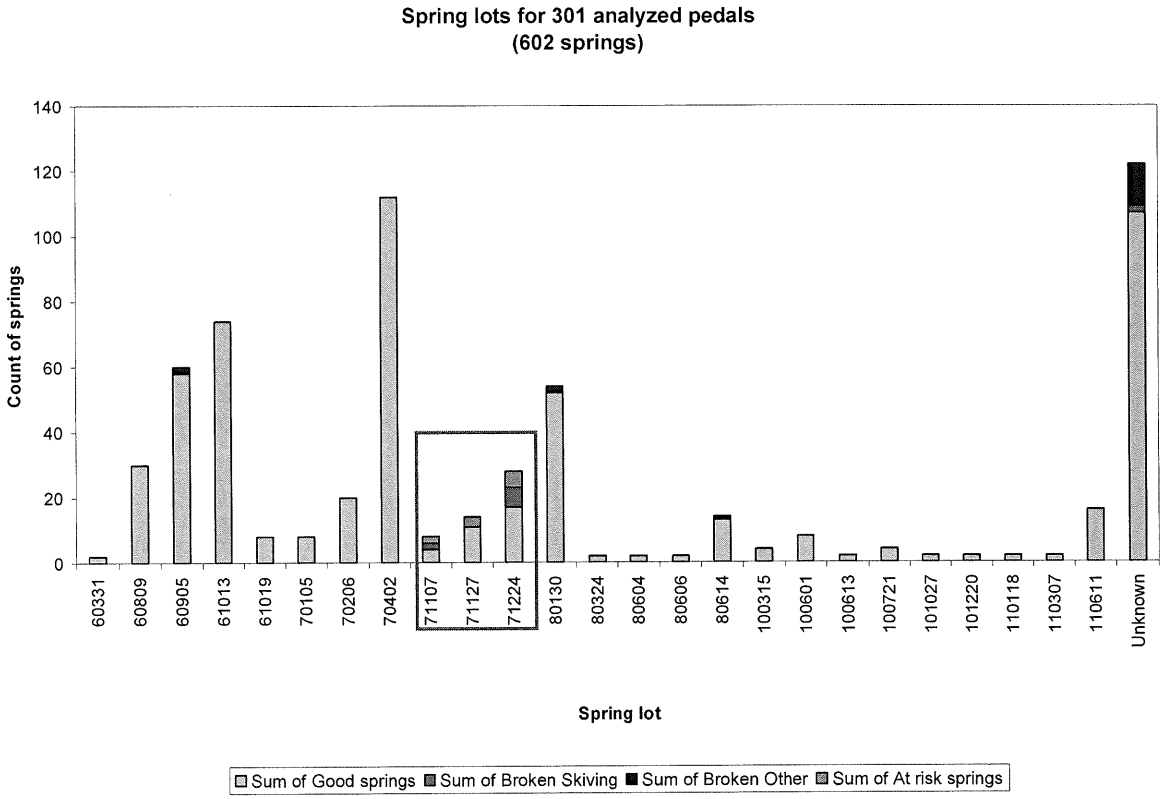
Appendix 1: Timeline of Events for WM-526 spring issue



Appendix 2: Summary of Pedals with fracture or at risk springs due to improper skiving

Group	Claim Number	Pedal Build Date	Return Region	Mode	Spring Lot #	Miles	Good springs	Broken Skiving	At risk springs
1st Field Returns	[redacted]	Not available	India B9R	Skiving mark	N/A	168,202	1	1	0
1st Field Returns	[redacted]	02/15/08	Ireland	Skiving mark	71224	N/A	1	1	0
1st Field Returns	[redacted]	02/15/08	Ireland	Skiving mark	71224	101,257	1	1	0
1st Field Returns	[redacted]	12/28/07	Ireland	Skiving mark	71107	151,455	1	1	0
1st Field Returns	[redacted]	02/15/08	Ireland	Skiving mark	71224	88,717	1	1	0
1st Field Returns	[redacted]	02/15/08	Ireland	Skiving mark	71224	129,068	1	1	0
1st Field Returns	[redacted]	02/15/08	Ireland	Skiving mark	71224	132,669	0	2	0
Ireland Replace	[redacted]	12/28/07	Ireland	Skiving mark	71107	140,393	1	1	0
Ireland Replace	[redacted]	12/25/07	Ireland	At risk	71127	168,824	1	0	1
Ireland Replace	[redacted]	02/15/08	Ireland	At risk	71224	N/A	0	0	2
Ireland Replace	[redacted]	02/15/08	Ireland	At risk	71224	N/A	1	0	1
Ireland Replace	[redacted]	02/15/08	Ireland	At risk	71224	161,999	0	0	2
Ireland Replace	[redacted]B	12/28/07	Ireland	At risk	71107	N/A	0	0	2
Ireland Replace	[redacted]	12/25/07	Ireland	At risk	71127	22,958	0	0	2
Ireland Replace	[redacted]	Not available	Ireland	Skiving mark	N/A	N/A	1	1	0

Appendix 3: Spring lots for analyzed pedals



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

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

October 16, 2014

[redacted]

NVS-215cg
EQ 14-012
14E-018
13V-532

Subject: Safety Recall 14E-018 and 13V-532

Dear Ms. Marie Shober:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain throttle pedal springs. This investigation has been assigned the identification number EQ 14-012.

On October 28, 2013, Prevost Cars, Inc. (Prevost) notified the NHTSA that it decided a defect exists in certain model year (MY) 2009-2010 H3-45 and MY 2009 H3-41, X3-45, XLII Converted Coach Shells and XLII-45 Entertainer Converted coach and MY 2008 H3-VIP coach shells. The mechanical springs manufactured by Williams Controls, Inc. (Williams) are used to return the accelerator pedal to idle after the driver lifts their foot off the pedal may break. If the springs break, the pedal may not return to idle once the driver lifts their foot off the pedal, increasing the possibility of a loss of vehicle control and the risk of a crash. This matter was assigned recall number 13V-532. A copy of the notification is enclosed for your information.

On April 21, 2014, Gillig LLC (Gillig) notified the NHTSA that it is recalling certain models of throttle pedal springs manufactured by Williams, Part Number (PN) 351298 or Gillig PN 51-19017-016, Williams PN 351571 or Gillig PN 51-19017-019, Gillig PN 45-35027-000. Gillig used the springs in a subassembly. The springs on the throttle used to return the throttle pedal may fracture prematurely due to stress risers originating from pinched or lapped material. If the springs fracture, this could cause a loss of vehicle control and an increase the risk of a vehicle crash. This matter was assigned recall number 14E-018. A copy of the notification is enclosed for your information.

Williams reported to NHTSA that it sold [redacted] of these defective throttle pedal springs to [redacted] (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective throttle pedal springs. 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 required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;
b. 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,
c. 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 that vehicles it manufactured with these throttle pedal springs are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include 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.

IMPORTANT UPDATE:

All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers **and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220**

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-012.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

Sincerely,



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

Enclosures

RECEIVED
y Recall Management Division at 6:03 am, Oct 29, 2013

13V-532
(4 pages)
PREVOST

October 28, 2013

Jennifer Timian
Chief, Recall Management Division
Office of Defect Investigations
National Highway Traffic Safety Administration (NSA-10)
1200 New Jersey Avenue, S.E.
Washington, D.C, 20950
Submitted via Email to rmd.odi@dot.gov

Subject: Recall Campaign SR13-72
Accelerator Pedal Power Spring

Dear Jennifer,
On behalf of Prevost, I want to inform you that on October 21, 2013, a safety-related defect was determined to exist on certain Prevost vehicles. The issue is on a limited number of accelerator pedals where the mechanical power spring, which is an integral part of the accelerator pedal, may prematurely fail. There have been no reports of vehicle crashes associated with this defect; therefore, Prevost views this as a preventive measure.

Prevost will administer a voluntary safety recall to inspect and replace the suspect accelerator pedals as required on the affected vehicles. Owner notification letters will be sent no later than 60 days from the time of this notice.

Please feel free to contact me if you have any questions.

Best regards,

Tim LaFon
Vice President, Regulatory Affairs
Volvo Group North America, LLC.
7900 National Service Rd.
Greensboro, NC 27409
Office: (336) 393-2233

PREVOST

Defect Report

Recall Campaign Number: Prevost SR13-72
Subject: Accelerator Pedal Power Spring

Vehicle Manufacturer:
Prevost a division of Volvo Group Canada, Inc. ("Prevost")

Component Manufacturer:
Williams Controls
14100 SW 72nd Avenue
Portland, OR 97224

Component: WM-526 Accelerator Pedal

Models/ Model Years:

Certain vehicles manufactured from July 18, 2008 through December 8, 2008 with Prevost PN 531483 (Williams Controls PN 351692).

Selection of vehicles was based on delivery information from Williams Controls and Prevost's part usage records.

Affected models and model years include:

Model	Model Year(s)
X3-45 Coach	2009
H3-41 Coach	2009
H3-45 Coach	2009, 2010
H3-VIP Coach Shells	2008
XL2 Converted Coach Shells	2009
XL2-45 Entertainer Converted Coach Shells	2009

Recall Population:

There are 32 suspect pedals that were sold to Prevost. A review of production data revealed that there are 81 vehicles that were sold in the United States that may have received a suspect accelerator pedal.

The percentage of the population containing the defect is unknown.

Description of the Defect

Mechanical springs are used to return the accelerator pedal to idle when the driver lifts their foot off of the accelerator pedal. On the suspect pedals, the edge of the raw material that was used to make the spring may have a poor edge condition that can result in a local stress riser and a fracture origination point. As a result, a crack may occur that can lead to a broken spring.

There are two springs; therefore, both springs would have to fail to present a risk.

If both springs were to fail, it could result in the pedal not returning to idle. If this occurs, this may present a risk of a vehicle crash under certain conditions if the driver does not have time to take action by applying the service brakes, switching the transmission into neutral, applying the park brake, or cutting off the ignition key.

Chronology:

6/20/13	Volvo Group North America's Regulatory Affairs opens an investigation on accelerator pedals. This was prompted by reports of spring failures being tracked by the Volvo Bus Europe.
7/9/13	Initial findings are that the suspect parts were only installed on Volvo Buses, which have an accelerator pedal disable feature. Therefore, this was not considered a safety-related defect.
9/23/13	William's Control informs Volvo Group North America that Prevost received 32 pedals with suspect springs.
9/26/13	Volvo Group North America's Regulatory Affairs Group informs NHTSA.
10/21/13	Product Safety Committee determines that a safety-related defect exists on Prevost vehicles manufactured with the suspect accelerator pedals.
10/28/13	Safety –related defect report submitted to NHTSA.

There are three warranty claims that were received on April 27, 2010, August 3, 2010, and August 23, 2010 where the accelerator pedal was replaced; it is unknown whether these are related.

To date, no accidents, injuries nor fatalities have been reported.

Description of the Remedy
The recall repair will involve inspection and replacement if the part is stamped with a suspect serial number.

Reimbursement for cost incurred by the owner for "prenotification remedies" will be addressed on a case-by-case basis according to the Volvo Group North America's "General Plan for Reimbursement of Pre-notification Remedies" which was published October 28, 2013.

Recall Communications
Owner notification will occur within 60 days of this notice. An advanced copy of the owner notification letter will be submitted for review and approval prior to release.

RECEIVED
By Recall Management Division at 2:10 pm, Apr 21, 2014

14E-018
(5 pages)

Safety Defect and Noncompliance Report Guide for Equipment
Part 573 Defect and Noncompliance Report

On April, 16, 2014 Gillig LLC **decided that a defect which relates to motor vehicle safety exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.**

Date this report was prepared: April 21, 2014

Furnish the manufacturer's identification code for this recall (if applicable): N/A

1) Identify the full corporate name of the company initiating the recall.
Gillig LLC
25800 Clawiter Road
Hayward, Ca 94545

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.
Gregory J. Vismara
Gillig LLC
Vice President

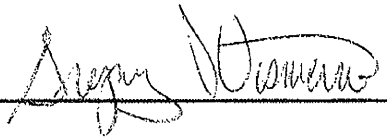
Telephone number: 510-264-5037 **Fax Number:** 510-264-3897

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.
Williams Controls
14100 SW 72nd Avenue
Portland, Oregon 97224

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:
Kurt J. Studer, Director of Quality

Telephone number: 503-684-3801

Name and Title of Person who prepared this report:
Gregory J. Vismara
Gillig LLC
Vice President

Signed: 

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Items of Equipment Involved in this Recall. For each make and model or applicable item of equipment product line provide:

Generic name of the item: Throttle Pedal

Make: Williams Controls **Model:** WM-526
Part Number: Williams PN 351298 Gillig PN 51-19017-016
Function: The throttle pedal is the physical device used by the operator to command speed/torque to the engine.
Other information which characterizes/distinguishes the item of equipment to be recalled: The suspect throttle pedals may contain mechanical power springs that may fail prematurely. These pedals are marked with specific serial numbers.

Make: Williams Controls **Model:** WM-526
Part Number: Williams PN 351571 Gillig PN 51-19017-019
Function: The throttle pedal is the physical device used by the operator to command speed/torque to the engine.
Other information which characterizes/distinguishes the item of equipment to be recalled: The suspect throttle pedals may contain mechanical power springs that may fail prematurely. These pedals are marked with specific serial numbers.

Make: Williams Controls **Model:** WM-526
Part Number: Gillig PN 45-35027-000 (Assembly containing Williams PN 351298)
Function: The throttle pedal is the physical device used by the operator to command speed/torque to the engine.
Other information which characterizes/distinguishes the item of equipment to be recalled: The suspect throttle pedals may contain mechanical power springs that may fail prematurely. These pedals are marked with specific serial numbers.

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

II. Identify the Recall Population

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

Model	Year	Number of Items Potentially Involved
51-19017-016	Shipped to Gillig 2008	92
51-19017-019	Shipped to Gillig 2008	1
45-35027-000	Shipped to Gillig 2008	5

Total Number Potentially Affected by the Recall: 98

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance: 50%

Identify and describe how the recall population was determined – in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:
Williams controls provided component serial numbers and associated purchase order numbers for the suspect units. Based on that information and inventory level tracking, Gillig Parts Department determined to which customers these pedals were sold/shipped. All suspect pedals were sold to the aftermarket, no suspect pedals were installed on Gillig production vehicles.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or non-compliance. Illustrations should be provided as appropriate.
Mechanical springs are used to return the throttle pedal to idle when the driver lifts his/her foot off the throttle pedal. Suspect pedals may contain springs which may fracture prematurely due to local stress risers originating from pinched or lapped material on the radius edge of the spring material.

Describe the causes(s) of the defect or noncompliance condition.
The pinched or lapped material on the radius edge of the spring material appears to have been present prior to the winding of the springs and was likely caused by a variation in skiving during the material manufacturing process.

Describe the consequence(s) of the defect of noncompliance condition.
There are two springs, therefore both springs would have to fail to present a risk. If both springs were to fail, it could result in the pedal not returning to idle and potentially loss of vehicle control.

Identify any warning which can (a) precede or (b) occur.
Upon failure of the first spring the driver may notice a decrease in the required pedal effort.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.
Williams Controls
14100 SW 72nd Avenue
Portland, Oregon 97224

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:
Kurt J. Studer, Director of Quality

IV. Provide the Chronology in Determining the Defect/Noncompliance

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.
January 7, 2014 Williams Controls provided Gillig with data and failure analysis reports on throttle return spring failures. April 16, 2014 Gillig determined that a safety related defect exists on parts supplied through the Gillig Parts Department for aftermarket service replacement. To date, no accidents, injuries, fatalities or related warranty claims have been reported.

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

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.
The remedy will involve replacement of the entire pedal assembly if the assembly is labeled with a serial number from the suspect lot. Replacement pedal assemblies do not contain suspect springs.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.
New pedal assemblies will not be marked with serial numbers from the suspect list.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.
All suspect pedals were sold to the aftermarket through the Gillig Parts Department, no suspect pedals were installed on Gillig production vehicles.

VI. Identify the Recall Schedule

9. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.
Recall will begin immediately after NHTSA approval. Replacement parts are available.

VII. Furnish Recall Communications

10. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. ***A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.***

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.