FERRARA
FERRARA FIRE APPARATUS, INCORPORATED

By Electronic Mail (Cynthia.Glass@DOT.GOV)

December 19, 2014

Cynthia Glass
General Engineer, RMD
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

RE: – Throttle Pedal Spring Systems Failure
EQ14-012 Equipment Query

Based on our evaluation we have found no issue with the WM-526 pedal pertaining to the springs. This also coincides with the attached document from Curtiss-Wright and their findings. Ferrara Fire has received no reports of spring fractures in any vehicles equipped with a WM-526 pedal. Ferrara Fire feels that this condition does not present an unreasonable risk to motor safety in the United States.

If you require additional information, please do not hesitate to contact me.

Sincerely,

Ronald G. Lavicott

Director of Chassis Engineering
Ferrara Fire Apparatus, Inc.
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Holden, LA 70744

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Kevin Word
Ferrara Fire Apparatus
27855 James Chapel Road
Holden, LA 70744

October 20, 2014

REF: WM-526 Accelerator Pedals

Dear Kevin,

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 Ferrara Fire Apparatus. The specific WM-526 information we provided to NHTSA on sales to your company will be made available. We understand Ferrara Fire Apparatus 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.

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

Regards,

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