12 November, 2014 VIA EMAIL & MAIL

Cynthia Glass
National Highway Traffic Safety Administration (NHTSA)
Recall Management Division
Location: NVS-215 - Rm W48-331
1200 New Jersey Ave. SE,
Washington, DC 20590

Subject: **EQ 14-012 – Williams Controls - Throttle Pedal Return Springs**

Ref: Certified Letter received on 30 October 2014
Dated 16 October 2014 from J. Timian, Recall Management Divison Chief

Our File: R14-017

Dear Ms. Glass:

New Flyer Industries Canada ULC and New Flyer of America Inc. (together "New Flyer"), confirm receipt of the subject Equipment Query (EQ).

In July of 2014 Williams Controls (a division of Curtiss-Wright) contacted New Flyer to inform us of the offshore failures of their product, and provided us with information on both the Provost (Volvo) and Gillig recalls related to the components in question. At that time they also provided us with the analysis report on the WM-526 pedal assembly.

New Flyer conducted a historical review of all field issues associated with the Williams Controls assembly. To date, there have been no reported faults or failures of throttle return springs in the WM-526 assembly on any New Flyer buses.

It is also New Flyer's understanding that neither Gillig, Provost (Volvo) or Daimler Bus have experienced a failure of this component, and that the only recorded failures so far are those offshore events in 2010 and 2011 as identified in the Williams Controls report of 17 February 2013.

The offshore failures reported, on the batches identified as suspect, occurred within three to four years of manufacture. The same components from that time period installed on New Flyer buses have been in service for seven to eight years without a single reported incident of spring failure.

Since both springs would have to fail for a control issue to arise, and a pedal with one failed spring would operate in a sluggish nature, it is highly unlikely that the maintenance environment in North America would allow for a bus to remain in service in this condition. Yet again, none have been reported.

This issue has been fully examined by New Flyer. In August of 2014 a risk analysis was conducted, in reference to all the information as presented above. The determination was that the likelihood for a double spring failure to occur is extremely remote.

Due to lack of supporting evidence of a potential threat to vehicle or passenger safety, New Flyer determined not declare a recall on the Williams Controls throttle return springs.

If you have any questions or require clarification on any point, please contact me.

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



By: Kerry Legg
Vehicle Safety & Regulatory Compliance Manager
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