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Via Electronic Mail: Cynthia.glass@dot.gov

October 24, 2014

Ms. Cynthia Glass
National Highway Traffic Safety Administration
The Recall Management Division: NVS-215
1200 New Jersey Avenue, S.E.
Room W48-331
Washington, D.C. 20590

Re: **Bendix Commercial Vehicle Systems LLC Response to EQ14-012**

Dear Ms. Glass:

This letter is being provided in response to Jennifer Timian's letter of October 16, 2014.

The request in the letter is for Bendix Commercial Vehicle Systems LLC (Bendix CVS) to either file a recall notice and information report, or file an explanation of a decision not to make a defect decision.

In the first page of Ms. Timian's letter it states the following:

> "Williams reported to NHTSA that it sold 10 of these defective throttle pedal springs to Bendix Commercial Vehicle Systems (your company) for possible installation into vehicles".

This statement is incorrect. Bendix CVS purchased 10 throttle pedal assemblies and not the individual springs.

Bendix CVS has determined that it will not make a defect decision on the Williams Controls' WM-526 throttle pedal assemblies. Bendix CVS purchased the 10 throttle pedal assemblies from Williams Controls and sold them to AutoCar Trucks Service locations as service kits. Bendix CVS is not the manufacturer of these assemblies, nor does Bendix CVS have design, manufacturing or test responsibilities for this product, nor did Bendix CVS install these assemblies into any motor vehicles. As such, Bendix is not in a position to render a defect determination. Bendix CVS notes that, in a July 29, 2014 letter from Williams Control to Bendix CVS, Williams stated, "Williams Controls continues to believe that this condition does not present an unreasonable risk to motor vehicle safety in the United States".

Based on the above information, Bendix CVS does not believe it has a responsibility to file a defect notification on this issue.

Best Regards,



Rafael Dominguez
Director Quality & Product Safety