January 6, 2015

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, 14E-018, 13V-532 – Williams Controls - Throttle Pedal Return Springs**
Ref: Certified Letter received on December 18, 2014
Dated: December 18, 2014 from J. Timian, Recall Management Division Chief

Dear Ms. Glass:

NABI Bus, LLC confirms receipt of the subject Equipment Query (EQ).
In July of 2014 NABI became aware of the Gillig recalls related to the components in question. At that time we initiated an investigation to determine if NABI had been shipped any of the subject throttle assemblies. We contacted Williams Controls for more information and determined that 50 of the subject throttle assemblies had been shipped to NABI Parts, LLC for aftermarket part sales. These assemblies were not installed on any NABI buses during production of those buses. Williams Controls advised NABI that they had not initiated a recall of these pedal assemblies, and noted that the assembly had dual or redundant return springs.

To date, there have been no reported faults or failures of throttle return springs in the subject assemblies sold through our aftermarket parts or on any NABI buses.

It is also NABI'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 sold by NABI Parts, LLC have likely 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 NABI. In August of 2014, 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, NABI determined not to declare a recall on the Williams Controls throttle return springs. If you have any questions or require clarification on any point, please feel free to contact me.

Sincerely,

Dan Allen
Chief Engineer of Mfg. and Service Support
Office 256-241-1274; Cell 256-453-2242
Email: dan.allen@nabiusa.com