NAVISTAR®

Navistar, Inc.
2601 Navistar Drive
Lisle, IL 60532 USA

P: 331-332-1590
W: navistar.com

R. L. Van Laar
Compliance Manager

Cynthia Glass
Recall Management Division
Office of Defects Investigation
Enforcement
1200 New Jersey Ave. S.E.
Washington, D.C. 20590

October 29, 2014

Ref.: EQ 14-012
NVS-215cg

Navistar Inc. is responding to your letter dated 10/16/14 and received in this office on 10/20/14 regarding 1764 possible defective throttle pedal springs that may have been shipped to Navistar by Williams Controls Inc. for installation onto our vehicles.

Navistar has worked with Williams Controls to understand when the suspect shipments could have been sent to us. Suspect lots were shipped between March and August of 2008.

Navistar then determined a vehicle build population that could have the suspect pedal springs installed. Navistar then performed a warranty search based on this VIN population, reviewed field reports, and reviewed this build population for possible accidents or injuries. Navistar found no reported warranty claims, field reports, or reports of accidents or injuries as a result of vehicles built with the suspect pedal springs in North America. One warranty claim was found in Mexico where the pedal was replaced, but there was no indication of a broken spring.

Given this information and the fact that these vehicles have been operating for over seven years without any reported incident, Navistar does not plan to file a defect information report. We trust this letter addresses your inquiry regarding the suspect throttle pedal springs purchased from Williams controls.

The undersigned should be contacted for any additional information regarding this issue on (331) 332-1590.

Sincerely,

R. L. Van Laar

R. L. Van Laar
Product Compliance Manager
Navistar, Inc.

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

RECEIVED
OCT 20 2014
PRODUCT INTEGRITY

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

October 16, 2014

Navistar, Inc.
Attn: Mr. Rick Van Laar
2701 Navistar Drive
Lisle, Illinois 60532

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

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

Dear Mr. Rick Van Laar:

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 **1764** of these defective throttle pedal springs to Navistar, Inc. (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:

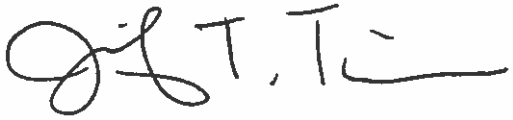
All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access 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