BY ELECTRONIC MAIL (cynthia.glass@dot.gov)

December 2, 2014

Ms. Cynthia Glass
Recall Management Division
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

Re: EQ14-012; NVS-215cg

Dear Ms. Glass:

This responds to Ms. Timian's October 16, 2014 letter in the above-referenced equipment query. The letter, which was addressed to Mr. Jeff Martin, was returned to NHTSA as undeliverable, but was subsequently emailed to me on November 21, 2014 with a request for a response by December 2.

As an initial matter, your letter incorrectly refers to Cummins as a vehicle manufacturer. Cummins is not a vehicle manufacturer, but is a manufacturer of engines and other equipment, which are sold as original and replacement equipment for both on-highway and off-highway applications.

With respect to the 32 WM-526 throttle pedal assemblies that Williams Controls reportedly sold to Cummins, we are continuing to investigate where or how these products were used by Cummins (e.g., internal testing, etc.) and whether any of these units were shipped beyond our control. I will follow up with you when I have more information, but please note that at this time, Cummins has not made a safety-defect determination with respect to the pedal assemblies or any Cummins products in which these components may have been installed.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Mark L. Wilson

Mark L. Wilson
Director – Product Safety
Cummins Inc.

Phone: 812-377-7543
Fax: 812-377-2433
Email: mark.l.wilson@cummins.com

cc: Mr. Christopher H. Grigorian, Foley & Lardner LLP

BY ELECTRONIC MAIL (cynthia.glass@dot.gov)

December 23, 2014

Ms. Cynthia Glass
Recall Management Division
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

Re: EQ14-012; NVS-215cg

Dear Ms. Glass:

This letter follows up on my December 2, 2014 letter and subsequent emails dated December 3, 2014 and December 10, 2014 (which was misaddressed and resent to you on December 22.) in the above-referenced equipment query. As stated in my December 10 email, we have determined the usage of the 32 units that were shipped to Cummins as follows:

Twenty-two units were installed on Cummins stationary-use engine training modules. These were not installed on motor vehicles and, in these applications, would not be considered "motor vehicle equipment."

Ten units were sold to an affiliated Cummins distributor, which installed them as replacement parts on used vehicles during a retrofit process. In this regard, Cummins and the Cummins distributor were merely distributors/installers of the Williams Control products. Neither would be deemed the manufacturer of the product of which the Williams Controls unit is a component.

In light of the foregoing, neither situation necessitates Cummins to make a safety defect evaluation with respect to these products.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Mark L. Wilson

Mark L. Wilson
Director – Product Safety
Cummins Inc.

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cc: Mr. Christopher H. Grigorian, Foley & Lardner LLP