



October 28, 2015

VIA EXPRESS MAIL

Mr. Bruce York, Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration

Washington, D.C.

Re:

Dear Mr. York:

On behalf of Volvo Trucks North America, I am responding to the questions presented in your letter dated October 13, 2015.

As always, we consider information on our customer's to be confidential. Therefore, any information regarding customer names, addresses and contact information should be blacked out before release to the NHTSA public website.

With Best Regards,

Tim L. LaFon
Vice President, Regulatory Affairs
Telephone:
Email:

1. *State the total number of subject vehicles sold in the United States by make, model, and model year. Further break this production data by front suspension type (i.e., air vs. spring) and cab suspension type (i.e., hard mount, spring, or air ride).*

Make	Model	Model Year	Total	Cab Suspension (Air)	Steer Axle Suspension (Mechanical)	Steer Axle Suspension (Air)
Volvo	VNL	2013	14,133	14,133	12,292	1,841
Volvo	VNL	2014	12,016	12,016	10,412	1,604
Volvo	VNL	2015	17,883	17,883	15,345	2,538
Volvo	VNL	2016	17,984	17,984	16,141	1,843
		Totals	62,016	62,016	54,190	7,826

2. *State the number, by make, model and model year, and provide copies of all documents containing the following, from all sources, of which Volvo is aware and which related, or could relate to the alleged defect in the subject vehicles:*
 - a. *Owner/ Fleet Complaints;*
 - b. *Field Reports;*
 - c. *Crash Incident Claims;*
 - d. *Subrogation Claims;*
 - e. *Property Damage Claims;*
 - f. *Third-party arbitration proceedings, where Volvo is or was a party to the arbitration; and,*
 - g. *Lawsuits, both pending and closed, in which Volvo is or was a defendant or codefendant.*

Table 1:

Make	Model	Model Year	Owner/ Fleet Complaints	Field Reports	Crash Incident Claims	Subro. Claims	Prop. Damage Claims	3 rd Party Arb.	Lawsuits
Volvo	VNL	2013	1	4	0	0	0	0	0
Volvo	VNL	2014	1	1	0	0	0	0	0
Volvo	VNL	2015	8	22	0	0	0	0	1*
Volvo	VNL	2016	3	5	0	0	0	0	0
		Totals	13	32	0	0	0	0	1

*The person that petitioned NHTSA and which is the subject of this inquiry

Further breakdown of reports from Table 1

Make	Model	Model Year	Owner/ Fleet Complaints	Field Reports	Loss of control	Cab Sway Reported	Cab Misalignment Reported
Volvo	VNL	2013	1	4	0	1	4
Volvo	VNL	2014	1	1	0	0	2
Volvo	VNL	2015	8	22	0	1	29
Volvo	VNL	2016	3	5	0	0	8
		Totals	13	32	0	2	41

3. *State, by make, model, and model year, a total count for all of the following categories of claims, collectively, that have been paid by Volvo to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.*

Make	Model	Model Year	Loss of control	Cab Sway reported	Cab misalignment reported
Volvo	VNL	2013	0	2	19
Volvo	VNL	2014	0	0	17
Volvo	VNL	2015	0	3	222
Volvo	VNL	2016	0	4	34
		Totals	0	9	292

4. *Provide all copies of service and technical documents, including but not limited to notices, bulletins, advisories, and other communications that Volvo provided, or made available to dealers, zone offices, field offices, fleet purchasers, relating in whole or part to the alleged defect in the subject vehicles or which will be provided or made available within the next 60 days.*

Volvo has released one instruction on how to correctly align the rear cab suspension and a DSM letter sent to Volvo District Service Managers to inform them of the reports of cab leaning. Both documents are attached.

5. *State whether and how the alleged defect could adversely affect vehicle control including advanced safety systems, such as electronic stability control, roll stability control etc., which may be offered on the subject vehicles. If any testing supporting Volvo's answer has been conducted, please provide a summary of the test purpose and result.*

The alleged defect does not adversely affect vehicle control. Volvo has not received any warranty claims, customer complaints, field reports, vehicle crash reports, property damage claims, or personal injury claims. Furthermore, the advanced safety systems are controlled by inputs from the chassis and not the cab; therefore, the systems are not affected.

6. *Furnish Volvo's assessment of the alleged defect in the subject vehicles, including*

a. *All causal or contributory factor(s);*

Potential causal or contributory factors include leaking shocks, deflated air bags, worn components such as the torsion bar, and misalignment of cab.

b. *The failure mode(s);*

Aesthetic and feel, there are no safety-related failure modes

c. *Root cause of failures; and*

See response to "a".

d. *The risk to motor vehicle safety that it poses.*

There is no risk to motor vehicle safety. Regarding the petitioner's truck that prompted this inquiry, we found no issues with the truck. In addition, the truck was reviewed by a third party assigned by the court, see attached, and there were no safety concerns noted.

Therefore, the claim is not a safety-related defect under the context of the Motor Vehicle Safety Act.