

PIERCE MANUFACTURING INC.

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AN OSHKOSH CORPORATION COMPANY • ISO 9001 CERTIFIED

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April 3, 2015

Ms. Cynthia Glass  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE.  
Washington, DC 20590

Re: EQ 15-003

Dear Ms. Glass:

Pierce Manufacturing Inc. (Pierce) is responding to the agency's March 20, 2015 letter concerning certain Cummins engines.

Pierce has had an opportunity to investigate this issue and believes there is no safety defect for our product. We have reached this conclusion based on the following:

1. From discussions with Cummins on this issue, Pierce has learned that Cummins does not believe there is any risk to safety related to the thermostat.
2. A review of our warranty data indicates no incidents of heater hose leaks in any manner that may be contributed to a malfunctioning thermostat.
3. Our vehicle design provides protection to occupants from potential heater hose leaks by several means—
  - The majority of heater lines that are located inside the passenger compartment are constructed of metal versus a rubber or silicon based soft hose (higher pressure rated).
  - The heater hose lines are enclosed or covered with panels, to provide protection to the hoses from being damaged or abused by occupants, and to contain any leak that may spray. If a leak were to occur, it would collect along the floor as is typical for most vehicles.
  - The soft hoses used are rated to handle pressures much higher than those produced by the coolant system.

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4. Pierce does not have any warranty data related to the thermostat in the Cummins engines. As the engine is separately warranted, any engine warranty or service repairs are performed by a Cummins dealer and not by Pierce. As a result, the warranty records related to the thermostat would not be in the possession of Pierce.

Based on the above points, Pierce does not believe there is a safety related defect associated with the thermostat on Cummins ISC/ISL engines. Therefore, we will not be issuing a defect notice at this time. We will continue to monitor our vehicles for any indication of such a problem occurring. If you require any further information, please contact me.

Sincerely



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