

From: [Lafon Tim \(othy\)](#)
To: [Bowker, Kyle \(NHTSA\)](#)
Cc: [York, Bruce \(NHTSA\)](#); [Brown Cheryl](#)
Subject: RE: Information Request Related to Investigation #EA16-001
Date: Monday, October 16, 2017 11:33:49 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Volvo's Response NEF 106kmb EA16 001 redacted.pdf](#)

Dear Kyle and Bruce,

See requested information/ responses to the inquiry I still need to collect all documents that would be reportable under question 6. I will compile this and send by FedEx as this will need to be put on a stick. This will take me a few days to get done.

Also, some of the information requested involves information in active lawsuits. I will request confidentially for these items, so I will send according to the requirements for treatment of confidential information. The attached document has the information redacted,

Best regards,
Tim

From: Lafon Tim (othy)
Sent: Friday, September 15, 2017 4:27 PM
To: 'Bowker, Kyle (NHTSA)'
Cc: York, Bruce (NHTSA); Brown Cheryl
Subject: RE: Information Request Related to Investigation #EA16-001

Dear Kyle,
Thank you very much for the extension. Attached is what I have collected thus far.

Best Regards,
Tim

From: Bowker, Kyle (NHTSA) [<mailto:Kyle.Bowker@dot.gov>]
Sent: Friday, September 15, 2017 4:00 PM
To: Lafon Tim (othy)
Cc: York, Bruce (NHTSA)
Subject: RE: Information Request Related to Investigation #EA16-001

Tim,

I am writing to acknowledge Volvo's request for a due date extension. I have passed your request on to Bruce York. As a matter of protocol, it is the ODI division chief who responds to requests for IR due date extensions. As I previously expressed to you via telephone, it was my intent to give manufacturers up to 8 weeks to respond to the peer IR letter. So an extension to the middle of October should be no problem.

I have advised Bruce of my recommendation and he will get back to you as soon as possible. In the

meantime, Volvo's request for a due date extension is satisfactory until Bruce formally responds to your request. Have a nice weekend.



Kyle Bowker
Senior Safety Defects Engineer, CNG-FSI, IAAI-FIT
Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE., Washington, DC 20590
Office: 202-366-9597 Mobile: 202-297-0617

From: Lafon Tim (othy) [<mailto:timothy.lafon@volvo.com>]
Sent: Wednesday, September 13, 2017 9:37 PM
To: Bowker, Kyle (NHTSA) <Kyle.Bowker@dot.gov>
Subject: RE: Information Request Related to Investigation #EA16-001

Dear Kyle,
Can I get an extension to the middle of October?

Thanks and Best Regards,
Tim

From: Lafon Tim (othy)
Sent: Wednesday, August 09, 2017 2:09 PM
To: 'Bowker, Kyle (NHTSA)'
Subject: RE: Information Request Related to Investigation #EA16-001

Hi Kyle,
Let's meet on Friday at 9 am if that is ok.

Best Regards,
Tim

From: Bowker, Kyle (NHTSA) [<mailto:Kyle.Bowker@dot.gov>]
Sent: Wednesday, August 09, 2017 2:00 PM
To: Lafon Tim (othy)
Subject: RE: Information Request Related to Investigation #EA16-001

I am also available tomorrow (Thursday) at 10am EDT. If you need more time to review the IR letter before we discuss, my schedule is open all day Friday.



Kyle Bowker
Senior Safety Defects Engineer, CNG-FSI, IAAI-FIT
Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE., Washington, DC 20590
Office: 202-366-9597 Mobile: 202-297-0617

From: Lafon Tim (othy) [<mailto:timothy.lafon@volvo.com>]
Sent: Wednesday, August 09, 2017 1:45 PM
To: Bowker, Kyle (NHTSA) <Kyle.Bowker@dot.gov>
Subject: RE: Information Request Related to Investigation #EA16-001

Hi Kyle,
Sounds good. I am available at 10 am and 1 pm tomorrow. Will either of these times work for you? I also have an open schedule on Friday if that works better.

Best Regards,
Tim

From: Bowker, Kyle (NHTSA) [<mailto:Kyle.Bowker@dot.gov>]
Sent: Wednesday, August 09, 2017 1:40 PM
To: Lafon Tim (othy)
Subject: RE: Information Request Related to Investigation #EA16-001

Tim,

I'd be happy to talk to you more in detail about the information request letter and expectations for how Volvo will respond. We can do this by telephone after you've had a chance to review the IR letter and think about it for a bit.



Kyle Bowker
Senior Safety Defects Engineer, CNG-FSI, IAAI-FIT
Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE., Washington, DC 20590
Office: 202-366-9597 Mobile: 202-297-0617

From: Lafon Tim (othy) [<mailto:timothy.lafon@volvo.com>]
Sent: Wednesday, August 09, 2017 1:30 PM
To: McClary, Barbara (NHTSA) <Barbara.McClary@dot.gov>
Cc: Bowker, Kyle (NHTSA) <Kyle.Bowker@dot.gov>; York, Bruce (NHTSA) <Bruce.York@dot.gov>; McMahon, Mary Kay (NHTSA) <marykay.mcmahon@dot.gov>; Brown Cheryl <cheryl.brown@volvo.com>
Subject: RE: Information Request Related to Investigation #EA16-001

Dear Barbara,
I acknowledge receipt of EA16-001. I will collect the requested information and respond to the inquiry. I do not see any issues at this time responding on the date Sept. 15, 2017; but if needed, will request additional time according to the instruction in the document.

Best Regards,

Tim

Cc. Cheryl Brown, Administrative Assistance

From: McClary, Barbara (NHTSA) [<mailto:Barbara.McClary@dot.gov>]

Sent: Wednesday, August 09, 2017 12:00 PM

To: Lafon Tim (othy)

Cc: Bowker, Kyle (NHTSA); York, Bruce (NHTSA); McMahon, Mary Kay (NHTSA)

Subject: Information Request Related to Investigation #EA16-001

Good morning,

Attached please find an information request related to Investigation #EA16-001.

Thank you,

Barbara McClary

Administrative Officer

NHTSA - Office of Defects Investigation (ODI)

U.S. Department of Transportation

1200 New Jersey Avenue, SE,

Washington, DC 20590

Office. 202-366-6805

barbara.mcclary@dot.gov

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1. State the number of subject vehicles manufactured to date, grouped by vehicle model and model year. Also, for each vehicle model and model year grouping, state the number of subject vehicles where Volvo installed the subject component(s) as original equipment.

Response: The information is provided in the table below. The information was last collected is October 12, 2017 and the source is Volvo and Mack Trucks production records. Note: the tanks identified as installed by Volvo Group were actually installed in most cases by the 3rd party CNG system/ tank supplier. They are identified as installed by the Volvo Group because we contracted the CNG system supplier to install the system and the work was conducted at our facility.

Make	Model	MY	# CNG vehicles manufactured	# vehicles with tanks installed by Volvo Group
Mack	Pinnacle (CXU)	2014	44	2
Mack	Pinnacle (CXU)	2015	444	362
Mack	Pinnacle (CXU)	2016	24	15
Mack	Pinnacle (CXU)	2017	53	0
Mack	Pinnacle (CXU)	2018	7	0
Mack	TerraPro (LEU)	2011	71	0
Mack	TerraPro (LEU)	2012	176	0
Mack	TerraPro (LEU)	2013	262	0
Mack	TerraPro (LEU)	2014	376	0
Mack	TerraPro (LEU)	2015	314	0
Mack	TerraPro (LEU)	2016	374	0
Mack	TerraPro (MRU)	2011	59	0
Mack	TerraPro (MRU)	2012	115	0
Mack	TerraPro (MRU)	2013	173	0
Mack	TerraPro (MRU)	2014	233	0
Mack	TerraPro (MRU)	2015	217	0
Mack	TerraPro (MRU)	2016	358	0
Mack	TerraPro (MRU)	2017	103	0
Mack	TerraPro (MRU)	2018	79	0
Mack	LR	2015	1	0
Mack	LR	2016	12	0
Volvo	VNL	2013	4	0
Volvo	VNL	2014	263	0
Volvo	VNL	2015	314	0
Volvo	VNL	2016	237	0
Volvo	VNL	2017	190	0
Volvo	VNL	2018	69	0
Volvo	VNM	2012	12	0
Volvo	VNM	2013	25	0
Volvo	VNM	2014	110	0
Volvo	VNM	2015	1	0
Volvo	VNM	2016	34	0
Volvo	VNM	2017	0	0
Volvo	VNM	2018	20	0

2. State the number of subject vehicles Volvo is aware of, that have experienced Level 3 damage to one or more subject components, grouped by vehicle make, model and model year. Multiple incidents involving the same vehicle are to be counted together as one.

Response: Volvo is aware of four (4) reports where Level 3 damage occurred to the subject components. The information was last collected on October 16, 2017. The source of the information is the Volvo Group North America Regulatory Affairs and Legal Department files,

Vehicle Make	Vehicle Model	Vehicle Model Year	Number per category
Mack	TerraPro (MRU)	2014	One (1)
Mack	TerraPro(MRU)	2016	One (1)
Volvo	VNL	2015	Two(2)

3. State the number of subject components Volvo has installed as original equipment on subject vehicles, sold for service replacement and/or aftermarket installation to date, grouped by calendar year of vehicle production (for original equipment) or calendar year of fuel container sale (for service replacement and/or aftermarket installation), and by fuel container designation (Type 1, Type 2, Type 3 or Type 4).

Response:

Calendar Year	Tank Type	Original Equipment	Service Replacement/ Aftermarket Installation
2010	4	0	0
2011	4	0	0
2012	4	0	0
2013	4	2	0
2014	4	362	0
2015	4	15	0
2016	4	0	0
2017	4	0	0

The information was last collected on October 12, 2017 and the source is Volvo and Mack Trucks production records. Note: the tanks identified as installed by Volvo Group were actually installed in most cases by the 3rd party CNG system/ tank supplier. They are identified as installed by the Volvo Group because we contracted the CNG system supplier to install the system and the work was conducted at our facility.

4. State the number of subject components Volvo is aware of, that have experienced Level 3 damage. For each such container, please provide:
- Calendar year of vehicle production (for original equipment) or calendar year of fuel container sale (for service replacement and/or aftermarket installation);
 - End-of-life date;
 - Calendar year the fuel container was condemned;
 - Fuel container designation (Type 1, Type 2, Type 3 or Type 4); and
 - Summary description of damage that condemned the cylinder (i.e. object impact or abrasion; fire exposure; chemical exposure; improper repair attempt).

Response:

	<i>Incident 1</i>	<i>Incident 2</i>	<i>Incident 3</i>	<i>Incident 4</i>
<i>a. Calendar Year of vehicle production</i>	<i>2013</i>	<i>2014</i>	<i>2014</i>	<i>2015</i>
<i>b. End-of-life date</i>	<i>unknown</i>	<i>unknown</i>	<i>unknown</i>	<i>unknown</i>
<i>c. Calendar year the fuel container was condemned</i>	<i>2016</i>	<i>2015</i>	<i>2016</i>	<i>2017</i>
<i>d. Fuel container designation</i>	<i>4</i>	<i>4</i>	<i>4</i>	<i>4</i>
<i>e. Summary description of damage</i>	<i>Fire Exposure</i>	<i>Fire Exposure</i>	<i>Fire Exposure</i>	<i>Fire Exposure</i>

The information was last collected on October 16, 2017. The source of the information is the Volvo Group North America Regulatory Affairs and Legal Department files,

5. State the number of each of the following, received by Volvo, or of which Volvo is otherwise aware, which relate to, or may relate to, the integrity of the subject components:
- Reports involving a crash;
 - Reports involving a fire or explosion;
 - Reports involving injury or fatality;
 - Property damage claims;
 - Third-party arbitration proceedings where Volvo is or was a party to the arbitration; and
 - Lawsuits, both pending and closed, in which Volvo is or was a defendant or codefendant. For subparts "a" through "f," state the total number of each item (e.g., crash reports, injury reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a crash report and an injury report involving the same incident in which a crash occurred are to be counted as a crash report, an injury report and a lawsuit report). In addition, for each incident related to items "a" through "f," provide a summary

description of the alleged problem and causal and contributing factors and Volvo's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Response:

a. Reports Involving Crash	0
b. Reports involving fire or explosion	4
c. Reports involving injury or fatality	1 injury reported
d. Property damage claims	2
e. Third-Party Arbitrations	0
f. Lawsuits	2

	Incident 1	Incident 2
Parties to the Action	See Below	See Below
Caption	[REDACTED]	[REDACTED]
Court	[REDACTED]	[REDACTED]
Docket number	[REDACTED]	[REDACTED]
Date filed	February 15, 2017	July 31, 2015

The information was last collected on October 16, 2017. The source of the information is the Volvo Group North America Legal Department files.

- 6 Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the integrity of the subject components or the fuel systems they are part of, that have been conducted, are being conducted, are planned, or are being planned by, or for, Volvo. For each such action, provide the following information:
- a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s), supplier(s) and/or third-party provider(s) responsible for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Response: The information associated with this request would be associated with the four incidents that are reported in question 2. This information is being collected and will be sent on a memory stick because of the size of some of the files. As some of this information is associated with active lawsuits, we will request confidentiality for this information.