GENERAL DYNAMICS
Land Systems

Via Electronic Mail
Kelly.schuler@dot.gov

20 May 2016 LAD 16-0114

Ms. Kelly Schuler
Safety Recall Specialist
Recall Management Division
Office of Defects Investigation
Enforcement
United States Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Ave SE
Washington, DC 20590

Subject: General Dynamics Land Systems, Inc Response to Safety Recall Notice 15E-065

Reference: 1. NHTSA Correspondence NEF-150kjs, EQ16-002, 15E065

Dear Ms. Schuler,

In response to the referenced correspondence, and as discussed during our phone call on 16 May 2016, General Dynamics Land Systems, Inc. (GDLS) advises that the Marmon-Herrington drive axles were used in vehicles which GDLS sold to Morgan Composites and Defence Systems (Morgan), a United Kingdom Company. The vehicles serve a military application and were ultimately sold to the Danish Acquisition and Logistics Organisation (DALO).

The Federal Regulations cited in the referenced correspondence are authorized by 49 USC §30102, which defines a "motor vehicle" as "vehicles… primarily for use on public streets, roads and highways". The vehicles in question were not offered for commercial sale in the United States, and its primary use is for military purposes, not for use on public streets, roads and highways. As such, the cited Federal Law is not applicable to the vehicles manufactured by GDLS. While GDLS does not intend to issue a recall notice, it plans to work with Morgan to mitigate any impact to the vehicles as a result of this issue.

If you should have additional questions or wish to discuss, please contact the undersigned at your earliest convenience.

Sincerely,

GENERAL DYNAMICS LAND SYSTEMS

Lauren A. Necci

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Contracts Specialist

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