



welcome to the world of Van Hool
elegance and efficiency in transport

Lier, November 30, 2017

Mr. Bruce York
Chief Medium and Heavy Duty Vehicle Division
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

by email e.york@dot.gov

Your reference : NEF-106rr PE17-006

Dear Mr. York,

On behalf of itself and its North American distributor, ABC Companies, Inc. ("ABC"), Van Hool N.V. ("Van Hool") submits this in response to your letters dated dd October 11, 2017 to Van Hool N.V. ("Van Hool") and ABC Companies ("ABC"). This response was prepared based upon a good faith search for responsive information, which focused upon certain locations where responsive information is most likely to be maintained and upon review of Van Hool and ABC files in which responsive information ordinarily would be expected to be found and to which Van Hool and ABC ordinarily would refer.

The responses are based on information provided by Van Hool and ABC, except for :

- **requests 2, 3, 7 : information only provided by ABC**
- **requests 5, 9, 11, 12 : information only provided by Van Hool**

The last date the information was gathered, is October 11, 2017.

Request 1. State, by model and model year, the number of subject and peer vehicles Van Hool has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Van Hool, state the following:

- Vehicle identification number (VIN);
- Make;
- Model;
- Model Year;
- Seat belt part number and design version installed as original equipment;
- Date of manufacture;
- Date warranty coverage commenced; and
- The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

The number of subject and peer vehicles Van Hool has manufactured for sale or lease in the United States stated by model and model year, are shown in : see Enclosure 1 – CONFIDENTIAL BUSINESS INFORMATION, submitted to the Office of Chief Counsel.

The table PRODUCTION DATA is in Microsoft Excel format, see Enclosure 2 – CONFIDENTIAL BUSINESS INFORMATION, submitted to the Office of Chief Counsel.

Request 2. State the number of each of the following, received by Van Hool, or of which Van Hool is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury or fatality;
- d. Reports involving a fire;
- e. Property damage claims;
- f. Third-party arbitration proceedings where Van Hool is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Van Hool is or was a defendant or codefendant.

For subparts "a" through "f, / g," state the total number of each item (e.g., consumer complaints, field 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 consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f, / g," provide a summary description of the alleged problem and causal and contributing factors and Van Hool's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e/f" and "f, / g," 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.

Van Hool has identified no consumer complaints (a) and 5 field reports (b), that relate or may relate to the alleged defect in the subject and peer vehicles.

Van Hool has identified no reports involving a crash, injury or fatality (c); no reports involving a fire (d); no property damage claims (e); no third-party arbitration proceedings where Van Hool is or was a party to the arbitration (f); and no lawsuits, both pending and closed, in which Van Hool is or was a defendant or codefendant (g).

Request 3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Van Hool's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether a fire is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide the table in Microsoft Access 2010, or a compatible format, entitled " PRODUCTION DATA."

The table COMPLAINTS & REPORTS DATA is in Microsoft Excel format, see Enclosure 3 – items c,d and e contain CONFIDENTIAL BUSINESS INFORMATION, submitted to the Office of Chief Counsel.



Request 4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Van Hool used for organizing the documents. Describe in detail the search methods and search criteria used by Van Hool to identify the items in response to Request No. 2.

Van Hool has no documents related to the items provided for Request No. 2. However the ABC CRM database for Customer Care contains as information the "concern" that is not requested in Request no. 3 and describes per item the issue in more detail : see Enclosure 4.

Upon request by Van Hool, ABC's Customer Care, Technical, Warranty Department, reviewed the CRM database of Consumer Complaints and Field Reports and identified the consumer complaints and field reports, which relate to the alleged defect in the subject and peer vehicles. In particular the field "concern" was searched for the words, or combination of the following words : seat, belt, casing, cover, buckle, broken, displaced, dislodged, failed.

Request 5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Van Hool to date that relate to, or may relate to, the alleged defect in the subject and peer 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.

Separately, for each such claim, state the following information:

- a. Van Hool's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state. or ZIP code;
- g. Labor operation number(s);
- h. Problem code(s);
- i. Diagnostic trouble code(s);
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;
- l. Cause as stated on the repair order;
- m. Correction as stated on the repair order; and
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

The number of warranty claims by model and model year that have been paid by Van Hool to date that relate to, or may relate to, the alleged defect in the subject and peer vehicles, are:

Model	CX35	CX45	CX45	TDX25	TX40	TX45	TX45	total
Model Year	2016	2015	2016	2016	2016	2015	2016	
Number	12	100	42	1	2	11	17	185

The table WARRANTY CLAIMS DATA is in Microsoft Excel format, see Enclosure 5 – items b and c contain CONFIDENTIAL BUSINESS INFORMATION, submitted to the Office of Chief Counsel.



Request 6. Describe in detail the search methods and search criteria used by Van Hool to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

The Van Hool claim database (Framework) was queried by the IT-department to identify the warranty claims that have been paid by Van Hool to date that relate to the alleged defect in the subject and peer vehicles. In particular the part numbers concerned were used as an identifier.

Request 7. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defect in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

Not applicable.

Request 8. State, by make and model year, the terms of the new vehicle warranty coverage offered by Van Hool on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Van Hool offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

The terms of the limited and extended warranty coverage offered by Van Hool on all subject vehicles is presented by Annex A (Part 3) of the Distributors Agreement with ABC : see Enclosure 6 – CONFIDENTIAL BUSINESS INFORMATION, submitted to the Office of Chief Counsel.

Request 9. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Van Hool has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Van Hool is planning to issue within the next 120 days.

Van Hool and ABC are planning to issue Service Bulletin SB1480 in order to change rigid safety belt buckles on vehicles to be determined : for the draft see Enclosure 7.

Request 10. 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 alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Van Hool. 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) 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.

There are 3 actions that relate or may relate to the alleged defect in the subject vehicles that have been conducted or are being conducted by, or for, Van Hool :



1. Seat questions

- a. Action title : Seat questions
- b. The actual start date : February 2, 2017
- c. The expected end date : n.a.
- d. Brief summary of the subject : ABC techs are passing on information on how the seats are used by customers and why the seat belt buckles are being damaged.
- e. Engineering group responsible : Van Hool Quality Department
- f. Brief summary of the findings and conclusions : The buckles are rigidly mounted and extend above the seat cushions. The solution proposed is a buckle on a flexible.

2. Survey of the vehicle involved in the incident at Biloxi

- a. Action title : Inspection of motor coach Biloxi
- b. The actual start date : March 30, 2017
- c. The actual end date : April 12, 2017
- d. Brief summary of the subject : Information requested by NTSB on the seat belt buckle design
- e. Engineering group responsible : Van Hool Sales Department
- f. Brief summary of the findings and conclusions : Multiple belt buckles were found with the cover out of place. All continued to operate with the exception of one.

3. Update to seat buckle issues

- a. Action title : Update to seat buckle issues
- b. The actual start date : August 30, 2017
- c. The expected end date : n.a.
- d. Brief summary of the subject : The Fasching buckles are being replaced in the field by Palaz buckles.
- e. Engineering group responsible : John Oakman, consultant for Van Hool and ABC
- f. Brief summary of the findings and conclusions : Two fixes were proposed, the buckle on a flexible was retained and 2000 samples were sent into the field for a try-out.

For copies of all documents related to the actions described : see Enclosures 8, 9 and 10.

Request 11. Provide the name, contact information, and part numbers for all suppliers Van Hool has purchased the subject component from.

The subject component is the seat belt buckle :

VH Part Number	Supplier part number	Supplier, Name
11457072	X-4315-2-009	Fasching
11485470	X-14-024-02	Fasching

The contact information of the supplier :

Fasching Salzburg - Hellbrunner Strasse 11 – A-5020 Salzburg - www.faschingsalzburg.com

Request 12. Describe all modifications or changes made by, or on behalf of, Van Hool in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;



- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Van Hool is aware of which may be incorporated into vehicle production within the next 120 days.

Van Hool purchases the subject components from a third-party supplier. To date, Van Hool is not aware of any modifications or changes made by, or on behalf of, Van Hool in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to the alleged defect in the subject vehicles.

13. Produce one/two of each of the following:

- a. Exemplar samples of each design version of the subject component;
- b. Field return samples of the subject component exhibiting the subject failure mode; and
- c. Any kits that have been released, or developed, by Van Hool for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Samples for the original component are enclosed and labeled number 11 and 12.

Field return samples are enclosed and labeled number 13 and 14.

Samples for use in service repair are enclosed and labeled number 15 (VH 11190252) and 16 (VH11568344).

14. State the number of each of the following that Van Hool has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

- a. Subject component; and
- b. Any kits that have been released, or developed, by Van Hool for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Van Hool is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

The numbers Van Hool installed of the subject components in production of the vehicles of make Van Hool, models CX and T(D)X of model year 2015 and 2016, and used in service (no info on model year) are:

Component	VH Part Number	Supplier Part Number	Supplier Name	Number Production	Number Service
service repair	11190252	P2013-071-A-14	Palaz	846	2308
subject /field return	11457072	X-4315-2-009	Fasching	11150	250
subject /field return	11485470	X-14-024-02	Fasching	3052	0
service repair	11568344	4309-2-002	Fasching	in development	

Fashing Salzburg - Hellbrunner Strasse 11 – 5020 Salzburg - Austria
Point of contact : Ing. Harald Peßl - Sales Director - Tel: +43 (0)662-842721-29



Palaz Safety Belts - Çalı San.Bölgesi Kanal Cad. No:17 - 16159 Çalı/Bursa - TURKEY
Point of contact : Dr. Ing. Sükrü KAYAOGLU – CEO - Tel: +90 224 482 48 31.

Van Hool installed the subject component also in production of the vehicles of make Van Hool, models CX and T(D)X of :

- model year 2017 produced from June 10, 2016 to May 21, 2017
- model year 2018 produced from May 14, 2017 to date

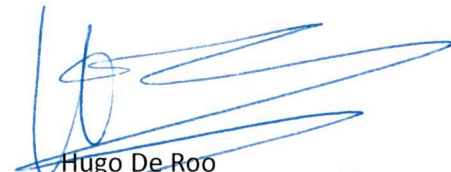
15. Furnish Van Hool's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The reports included with this inquiry.

- a. **The contributory factor to the alleged defect in the subject vehicle is the fact that the cover of the buckle is held in place by only one plastic notch.**
- b. **The failure mechanism is the cover sliding down when heavily pushed on (e.g. by standing on the buckle or tampering the buckle).**
- c. **The failure mode is the buckle mechanism uncovered.**
- d. **The risk to motor vehicle safety is undetermined.**
- e. **The operator and other persons inside the vehicle can easily see that the buckle is uncovered.**
- f. **There are no reports for this inquiry other than already mentioned.**

The documents in the enclosures to this request for information are provided as PDFs and Microsoft Excel files on the flash drive, which will be arriving together with the samples via Hand Delivery.

Sincerely,



Hugo De Roo
Area Export Manager



Pascale Reyntjens
Chief Compliance and Regulations

Cc. Van Hool : Sigrid Geldof, Mark Stroeykens, Geert Bauwens
Cc. ABC : Thomas Dematteo, Anne Archambault, Louis Hotard

