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March 11, 2019

Bruce York, Division Chief
Peter Kivett, Investigator
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE 20590

MAR 12 2019

Re: PE 18-009

Dear Mssrs. York and Kivett:

This letter is submitted in response to the Information Request (IR) dated September 19, 2018 with regard to PE 18-009. As you know, Pierce Manufacturing Co. (Pierce) was granted an extension of time to respond to the IR, and Pierce then met with you on November 30, 2018 to discuss its investigation into the issues raised in the IR. On January 2, 2019, Pierce submitted a Defect Information Report to conduct a safety recall to inspect field units and to reprogram control units as necessary. Per agreement with the agency, Pierce is nonetheless providing information relating to production volumes, as well as the number of warranty claims and customer complaints associated with this investigation.

Production Numbers

The recall covers 886 Arrow XT, Dash, Enforcer, Impel, Quantum and Velocity fire trucks built between January 22, 2004 and October 31, 2018. The trucks were either built with an aerial device Command Zone II controller, or such a controller may have been installed in the truck during service.

Warranty claims and Customer Complaints

Pierce received a total of five reports regarding unintended aerial ladder movement. Pierce's investigation found that three of the reports (one from the South Metro Fire Rescue

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Authority in Parker Colorado and two from the Montgomery County Fire and Rescue authority in Rockville, Maryland) were associated with an unintended signal generated within the control module. Two reports (one from the Passaic Fire Department in Passaic, New Jersey and the other from the Boston Fire Department in Boston, Massachusetts) were found to be associated with damage to the joystick control. Pierce reviewed its warranty claims and customer complaints and, while it identified 18 total claims involving the joy stick, the company did not identify any additional claims relating to unintended movement of the aerial ladder.

If you have any additional questions with regard to this investigation and recall, please let us know.

Very Truly Yours,

A handwritten signature in black ink that reads "Jacqueline Glassman". The signature is written in a cursive, flowing style.

Jacqueline Glassman