



Timothy J. Nalepka
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June 11, 2020

BY EMAIL AND BY OVERNIGHT DELIVERY

National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590
Attention: Bruce B. York, Chief
Medium and Heavy Duty Vehicles Division
Office of Defects Investigation

Re: NEF-106RR
PE20-001

Dear Mr. York:

This letter and enclosures will serve as Motor Coach Industries International, Inc.'s response to your April 7, 2020 letter in the above matter.

1. State, by model and model year, the number of subject and peer vehicles MCI has manufactured for sale or lease in the United States. Separately, for each subject and peer vehicle manufactured to date by MCI, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Subject component supplier, part number and design version installed as original equipment;
 - f. Date of manufacture;
 - g. Date warranty coverage commenced; and
 - h. 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".

RESPONSE:

Please see the “PRODUCTION DATA” worksheet in the attached Excel spreadsheet entitled “6_11_20 MCI RESPONSE TO ODI PE20-001”. The sources of the MCI data provided were MCI’s Production Schedule and engineering records, and the data was last gathered on or about June 5, 2020.

2. State the number of each of the following, received by MCI, or of which MCI 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. Property damage claims;
 - e. Third-party arbitration proceedings where MCI is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which MCI is or was a defendant or codefendant.

For subparts "a" through "f," 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," provide a summary description of the alleged problem and causal and contributing factors and MCI’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e/f" and "f/g," [sic] 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:

Please see the “Request 2” worksheet in the attached Excel spreadsheet entitled “6_11_20 MCI RESPONSE TO ODI PE20-001”. The sources of the MCI data provided were MCI’s Service Tracking database, TREAD Act reports and supporting data, and lawsuit and incident files, and the data was last gathered on or about June 9, 2020.

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. MCI'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. If passengers were transferred to a second vehicle and if this occurred at roadside;
- j. Whether a crash is alleged;
- k. Whether property damage is alleged;
 1. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

RESPONSE:

Please see the "REQUEST NUMBER TWO DATA" worksheet in the attached Excel spreadsheet entitled "6_11_20 MCI RESPONSE TO ODI PE20-001". The sources of the MCI data provided were MCI's Service Tracking database, TREAD Act reports and supporting data, and lawsuit and incident files, and the data was last gathered on or about June 9, 2020.

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 MCI used for organizing the documents. Describe in detail the search methods and search criteria used by MCI to identify the items in response to Request No. 2.

RESPONSE:

Please see the attached Excel spreadsheet entitled "6_11_20 Request 4 - MCI RESPONSE TO ODI PE20-001", which is separated into CONSUMER COMPLAINTS and FIELD REPORTS worksheets. MCI searched its Service Tracking database, TREAD Act reports and supporting data, and lawsuit and incident files, by using the following key words and part numbers:

KEY WORDS:

Hose, Coolant, Tube, Elbow, Hump Hose, Heater Hose, Radiator, Rad

PART NUMBERS:

16-11-1969

16-11-1970

06-01-1499

06-01-1653

06-01-1656

06-01-1647

06-01-1729

06-01-1701

6L-8-369

6L-8-350

06-01-1599

06-01-1601

06-01-1587

06-01-1562

06-01-1600

06-01-1624

06-01-1645

06-01-1651

06-01-1686

06-01-1750

The data was last gathered on or about June 9, 2020.

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by MCI 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. MCI'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. If passengers were transferred to a second vehicle and if this occurred at roadside;

- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- h. Labor operation number(s);
- i. Problem 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 this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

RESPONSE:

Please see the "WARRANTY DATA" worksheet in the attached Excel spreadsheet entitled "6_11_20 MCI RESPONSE TO ODI PE20-001". The source of the MCI data provided was MCI's warranty database, and the data was last gathered on or about June 9, 2020.

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

Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions, applicable to the alleged defect in the subject vehicles.

State, by make and model year, the terms of the new vehicle warranty coverage offered by MCI on the subject and peer 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 MCI offered for the subject and peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

RESPONSE:

Please see the "Request 6" worksheet in the attached Excel spreadsheet entitled "6_11_20 MCI RESPONSE TO ODI PE20-001". The sources of the MCI data provided were MCI's warranty database and sales contract files, and the data was last gathered on or about June 9, 2020.

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that MCI 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 MCI is planning to issue within the next 120 days. Provide copies of any service instructions and/or required tools concerning the subject components provided to dealers.

RESPONSE:

Please see the attached MCI Procedure 6-32 dated May 16, 2017. The source of the MCI data provided was MCI's Service Bulletin database, and the data was last gathered on or about June 9, 2020.

8. Describe all assessments, required maintenance, 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, MCI. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. Required service intervals as it pertains to time or mileage in service of the subject component;
 - c. The actual or planned start date;
 - d. The actual or expected end date;
 - e. Brief summary of the subject and objective of the action;
 - f. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - g. 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:

Please see the "Request 8" worksheet in the attached Excel spreadsheet entitled "6_11_20 MCI RESPONSE TO ODI PE20-001", and the documents contained within the folder "REQUEST 8 - MCI RESPONSE TO ODI PE20-001". The sources of the MCI data provided were MCI's engineering records and service reports, and the data was last gathered on or about June 9, 2020.

9. Describe all modifications or changes made by, or on behalf of, MCI 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 MCI is aware of which may be incorporated into vehicle production within the next 120 days.

RESPONSE:

Please see the “Request 9” worksheet in the attached Excel spreadsheet entitled “6_11_20 MCI RESPONSE TO ODI PE20-001”. The source of the MCI data provided was MCI’s engineering records, and the data was last gathered on or about June 9, 2020.

10. State the number of each of the following that MCI 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 MCI 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 MCI is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

RESPONSE:

Please see the “Request 10” worksheet in the attached Excel spreadsheet entitled “6_11_20 MCI RESPONSE TO ODI PE20-001”. The sources of the MCI data provided

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were MCI's engineering and production records, and sales records from MCI's affiliate (The Aftermarket Parts Company, LLC, d/b/a NFI Parts) with respect to aftermarket parts sales. The data was last gathered on or about June 9, 2020.

11. Furnish MCI'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.

RESPONSE:

Please see the "Request 11" worksheet in the attached Excel spreadsheet entitled "6_11_20 MCI RESPONSE TO ODI PE20-001". The source of the MCI data provided was MCI's engineering records, and the data was last gathered on or about June 9, 2020.

Please let me know if you should need any additional information.

Sincerely,
Motor Coach Industries International Inc.

By: Timothy J. Nalepka

Attachments

c: ryan.rahimpour@dot.gov (w/ attachs.)
ODI_IResponse@dot.gov (w/ attachs.)