

November 18, 2022

By Email

Joshua Neff
Chief, Medium/Heavy Duty Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave. SE
Washington, DC 20590

Re: Response to Information Request in PE20-006

Dear Josh,

PACCAR hereby responds to your letter of September 28, 2022, requesting information to assist NHTSA with its investigation of allegations of loss of power steering assist in model year 2010 through 2020 vehicles equipped with ZF/TRW THP60 steering gears. On Monday, October 3, the PACCAR team met virtually with Robert Nguyen to learn about the history of the investigation and to also explain certain data limitations that would affect our ability to respond to several of the questions in the information request. The principal limitation relates to the fact that we do not record the serial number of steering gears installed in Peterbilt and Kenworth production vehicles, nor do we record serial numbers of aftermarket components sold by PACCAR Parts. The following answers and accompanying attachments respond to the questions in the IR, subject to the clarifications agreed upon with Mr. Nguyen.

1. State, by model and production year, the number of subject components Paccar has purchased for OEM, repair and replacement and aftermarket use in the United States. Separately, for each subject component purchased to date by Paccar, state the following:

- a. Serial number;
- b. Make;
- c. Model;
- d. Facility where steering gear was manufactured or remanufactured;
- e. Subject component part number and design version;
- f. Date of subject component manufacture; and
- g. Date warranty coverage commenced;

Response: Please see attached confidential Excel file titled "PE20-006 PRODUCTION DATA PACCAR." PACCAR lacks sufficient information to provide all categories of data requested. Where possible, we provide vehicle-level information, as a surrogate for component-level information. Thus, the Excel file includes vehicle identification numbers and dates of manufacture for vehicles in which a THP60 steering gear was installed. Similarly, we provide the date on which the

vehicle's warranty coverage commenced. Part numbers are provided, but design versions are not tracked, because all design versions for the same part number are interchangeable and can be used on any chassis that requires that part number.

See also attached confidential Excel file "THP60 Steering Gear Aftermarket Sales" for PACCAR aftermarket sales of the THP60 steering gear. PACCAR does not require purchasers of service parts – namely authorized dealers and fleet customers -- to report the make, model and model year of the vehicle on which service components are installed. Accordingly, PACCAR is only able to provide annual sales data for each part number. All subject components were manufactured at the ZF/TRW facility in Lebanon, Kentucky.

2. State the number of each of the following, received by Paccar, or of which Paccar is otherwise aware, which relate to, or may relate to, the alleged defect in the subject component:

- 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 Paccar is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Paccar is or was a defendant or codefendant.

Response: Please see attached confidential Excel file titled "PE20-006 Question 2 TREAD Aggregates 2010-2020." We did not find any arbitrations or lawsuits involving the subject component. PACCAR independently reviewed field reports for the relevant date range and identified six field reports that may relate to the alleged defect in the subject steering gear. These six field reports were among the 12 potentially related field reports provided by Mr. Nguyen via email dated October 11, 2022. Our analysis led us to conclude that the remaining six field reports on NHTSA's list do not involve THP60 or substantially similar steering gears.

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. Paccar'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. OEM or aftermarket sales location which initially received the steering gear from ZF Group/TRW;
- e. Subject component's serial number;
- f. Subject component's make, model and production date;
- g. Subject component's mileage at time of incident if known;

- h. Subject component's time in service at time of incident;
- i. Incident date;
- j. Report or claim date;
- k. Whether a crash is alleged;
- l. Whether a fire is alleged;
- m. Whether property damage is alleged;
- n. Number of alleged injuries, if any; and
- o. Number of alleged fatalities, if any.

Response: Please see attached confidential Excel file titled "PE20-006." All reportable items are field reports; none involved a crash, fire, property damage, injury or fatality. PACCAR's business systems do not include telephone numbers of vehicle owners. However, we ran online searches and located phone numbers of four of the owners. We do not have information sufficient to answer subparts (e) through (i).

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

Response: Copies of six field reports are attached: SFN337-1414-01-00009, SFN337-1414-01-00023, SFN337-1515-01-00010, SFN567-1616-01-00108, SFN579-1616-01-00136, SFN579-1717-01-00137.

The search method involved two stages. First, PACCAR's Technical Compliance Manager queried TREAD reports for TREAD-reportable data citing steering issues within the 2010-2020 date range. The pulled field reports were reviewed by Engineering to determine which had a THP60 steering gear. This review was performed against the Production Data spreadsheet of chassis built with THP60 (see response to question 1).

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Paccar to date that relate to, or may relate to, the alleged defect in the subject components: 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. Paccar's claim number;

- b. Vehicle owner or fleet name (and fleet contact person), street address, email address and
- c. Serial number;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Vehicle's Time in Service at time of repair;
- 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. Diagnostic Trouble Code (s);
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer;
- m. Cause as stated on the repair order;
- n. Correction as stated on the repair order; and
- o. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Response: Please see attached confidential Excel file titled "REQUEST 5 WARRANTY DATA." Serial numbers of the steering gears are not recorded.

6. Describe in detail the search methods and search criteria used by Paccar 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.

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.

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

Response: PACCAR's warranty database was searched based on the following criteria:

- a. Claim is filed for one of the subject vehicles
- b. Claim is fully approved by PACCAR
- c. The failed or replaced part number includes one of the following
 - i. THP60013

- ii. J87-6007
 - iii. J87-6015
 - iv. J87-6018
 - v. J87-6028
- d. Claim Concern, Cause and Correction details were reviewed to confirm they were related to the alleged defect. Claims which were not related were excluded.
- e. Labor operations, problem codes and diagnostic trouble codes were not used to search. All claims that meet above criteria were read individually to see if they were related to the alleged defect.

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject components, that Paccar 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 Paccar is planning to issue within the next 120 days.

Response: After inquiry and investigation, PACCAR did not locate any documents meeting the description above.

8. 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 component that have been conducted, are being conducted, are planned, or are being planned by, or for, Paccar. 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.

Response: After inquiry and investigation, PACCAR did not identify any "actions" meeting the description above.

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

Response: PACCAR does not direct or control the design or manufacture of the subject ZF/TRW THP60 steering gear and has not made or requested any changes or modifications. Therefore, PACCAR is without information responsive to Question 9.

10. Produce one/two of each of the following:
a. Exemplar sample of each design version of the subject component;
b. Field return sample of the subject component exhibiting the subject failure mode; and
c. Any kits that have been released, or developed, by Paccar for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Response: PACCAR does not possess any of the physical items requested in Question 10. All warranty returns were sent directly to the supplier. PACCAR has not released or developed any kits for use in service repairs to the subject component/assembly.

11. State the number of each of the following that Paccar 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 Paccar for use in service repairs to the subject component/assembly.

Response: Please see attached confidential Excel file "THP60 Steering Gear Aftermarket Sales." PACCAR does not require purchasers of service parts – namely authorized dealers and fleet customers -- to state the make, model and model year

of the vehicle on which service components are installed. Accordingly, PACCAR does not have records of vehicles which have a component installed in service. In response to 11.b, PACCAR has not released or developed any kits for use in service repairs to the subject component/assembly.

12. 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 Paccar is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage. Furnish Paccar's assessment of the alleged defect in the subject component, 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; and
- 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;

Response: PACCAR lacks information sufficient to respond to Question 12. Our knowledge of the issue comes from our discussion with NHTSA and analysis of field reports. Six of the ten field reports are from chassis with steering gears that differ from the subject steering gear. Of the six reports many of them state the dealership could not duplicate the customer complaint. Those reports are, therefore, inconclusive and an evaluation of each truck would have to be done to pinpoint the cause of the customer complaint, which could be due to a steering gear or other steering component failure or vehicle misuse such as overloading the front axle. The field reports do not contain enough information to make any informed assessment of the alleged defect.

Thank you for your consideration. Please contact me if you have any questions regarding PACCAR's responses to this information request.

Very truly yours,

s/ Pamela S. Tonglao

Pamela S. Tonglao
Assistant General Counsel - Litigation

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