Cummins Clean Fuel Technologies
Initial Public Response
PE25003-01
May 23, 2025

Natural Gas Fuel Systems, LLC dba Cummins Clean Fuel Technologies
Partial Response to April 9, 2025 Information Request PE25003-01

Natural Gas Fuel Systems LLC, doing business as Cummins Clean Fuel Technologies (CCFT), submits this letter and accompanying documents in response to certain requests set forth in the National Highway Traffic Safety Administration's (NHTSA's) April 9, 2025 Information Request ID PE25003-01 regarding Preliminary Evaluation (PE) 25-003.

This response was prepared pursuant to a diligent search for the requested information and is made to the best of CCFT's present knowledge and available information. In preparing this response, CCFT directed personnel in relevant divisions to search for potentially responsive information. The scope of CCFT's search for responsive information focused on the locations where responsive information in CCFT's possession, custody, and control is most likely to be maintained, including CCFT files and information systems in which such information ordinarily would be expected to be found and to which CCFT ordinarily would refer. CCFT notes that although electronic information was included within the scope of its search, it has not attempted to retrieve from computer storage electronic files that were overwritten or deleted.

Based on the broad nature of the Agency's Request, the Office of Defects Investigations (ODI) agreed on May 21, 2025 to a partial extension of time to respond to specific requests.[1] Specifically, following receipt of CCFT's request to extend the due date for responses to certain requests to June 6, 2025, NHTSA extended the due date to respond to Request Nos. 1 and 10-13 by two weeks – until June 6, 2025. *Id.* Accordingly, CCFT is providing herewith its responses to Request Nos. 2-9.

RESPONSES TO NHTSA'S REQUESTS

CCFT has directed inquiries reasonably calculated to assure that its responses are complete and correct. Responses to the Agency's Requests are set forth below. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, information reflects data collected through May 16, 2025.

Request No. 2

State the number of each of the following, received by CCFT, or of which CCFT is otherwise aware, which relate to, or may relate to, the alleged defect in the subject 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 or explosion;

[1] *See* "Memo Granting IR Response Extension Request for PE25003-01" (May 21, 2025).

e. Property damage claims;
f. Third-party arbitration proceedings, both pending and closed, where CCFT is or was a party to the arbitration;
g. Lawsuits, both pending and closed, in which CCFT is or was a defendant or codefendent.

For subparts "a" through "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 "g," provide a summary description of the alleged problem and causal and contributing factors and CCFT's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "f" and "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.

Response to Request No. 2

In accordance with 49 CFR Part 512, information in response to items a. and b. in Request No. 2 is contained in CCFT's request for confidential treatment in the file named "CCFT Response to IR PE25003-01 Req. No. 2_CBI.pdf."

With respect to items c. through g., CCFT has not identified any reports that may be related to the alleged defect involving a crash, injury, or fatality; reports involving a fire or explosion; property damage claims; third-party arbitration proceedings (both pending or closed) where CCFT is or was a party to the arbitration; or lawsuits, both pending or closed, in which CCFT is or was a defendant or codefendant.

Request No. 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. CCFT'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), email address and telephone number (please use distinct fields for each data type);
d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
e. Vehicle's 17-character VIN;
f. Vehicle's make, model and model year (please use distinct fields for each data type);
g. Vehicle's mileage at time of incident (numeric data type);
h. Fuel container serial number;
i. Incident date (MM/DD/YYYY);
j. Report or claim date (MM/DD/YYYY);
k. Whether a crash is alleged;
l. Whether a fire or explosion is alleged;
m. Whether property damage is alleged;
n. Number of alleged injuries, if any; and
o. Number of alleged fatalities, if any.

Response to Request No. 3

In accordance with 49 CFR Part 512, information in response to Request No. 3 is contained in CCFT's request for confidential treatment in the file named "CCFT Response to IR PE25003-01 Req. No. 3_CBI.xlsx."

CCFT records all calls and repairs for these types of reports in a database that tracks our reports of issues in the field. For each unique report, the database assigns a Field Service Issue (FSI) and each FSI categorized using a drop-down menu, discussed in more detail in response to Request No. 4. The file submitted in the Part 512 request for confidential treatment includes five sheets, where each sheet includes details for all reports from a particular fleet operator. Blank cells mean that the information was not captured by CCFT.

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

Response to Request No. 4

In accordance with 49 CFR Part 512, documents in response to Request No. 4 are contained in CCFT's request for confidential treatment in the folder named "CCFT Response to IR PE25003-01 Req. No. 4_CBI." The folder contains subfolders with supporting documents that CCFT collected related to each FSI, which include records such as photographs, work orders, invoices, warranty orders, videos, and a summary document. The file names of the documents include the FSI number and the fleet name.

CCFT's database for tracking FSIs includes a drop-down menu to categorize the type of issue being reported, which must be completed when creating an FSI. These categories include the symptom "Leak-Tank Extender," which is used for any report of a cracked or failed end boss on the fuel container. After manually reviewing the reports, CCFT is providing all FSIs categorized as "Leak-Tank Extender." The FSI tracking database includes documents collected by CCFT in reviewing a report, all of which are included in the folder "CCFT Response to IR PE25003-01 Req. No. 4_CBI."

Request No. 5
State, by model and model year, a total count for all of the following categories of claims, collectively, to date that relate to, or may relate to, the alleged defect in the subject 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. CCFT's claim number;
b. Whether the claim was paid;
c. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
e. 17-character VIN;
f. Repair date (MM/DD/YYYY);
g. Vehicle mileage at time of repair (numeric data type);
h. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);
i. Labor operation number(s);
j. Problem 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 to Request No. 5

In accordance with 49 CFR Part 512, documents in response to Request No. 5 are contained in CCFT's request for confidential treatment in the file named "CCFT Response to IR PE25003-01 Req. No. 5_CBI.xlsx" with supporting documents in the folder "CCFT Response to IR PE25003-01 Req. No. 5_CBI." As discussed with NHTSA personnel, CCFT is providing the data based on the information stored in its information system used for tracking warranty claims (which includes claims for warranty and similar reimbursements). The first sheet in the spreadsheet provides total claims broken down by fuel system model and model year. The second sheet

provides detailed summaries of the field service issues, including the customer name and address (as tracked in the system), a description of the issue (which includes vehicle-specific information, such as the VIN, if recorded), status of the issue, dates, issue type, the serial number of the tank (the MFT Serial #), and whether the claim was paid (broken down for parts and for labor).

Request No. 6

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

Response to Request No. 6

The database used for tracking warranty and similar claims is the same system CCFT uses for tracking FSIs discussed in response to Request No. 4. Please see the response to Request No. 4 for a description of the search method used.

Request No. 7

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.

Response to Request No. 7

As discussed in response to Request No. 4, reports related to the alleged defect would have been categorized as "Leak-Tank Extender." The categories for labor operations related to "Leak-Tank Extender" are:

1. Leak Test System
2. Defuel System
3. R&R 1 Tank
4. R&R 2 Tanks
5. R&R 3 Tanks
6. R&R 4 Tanks
7. Fuel System

Request No. 8

State the terms of the warranty coverage offered by CCFT on the subject components and peer components (i.e., the number of months and mileage for which coverage is provided, which subcomponents are also covered, and any limitations and exclusions). Describe any extended warranty coverage option(s) that CCFT offered and state the number of subject components and peer components that are covered under each such extended warranty.

Response to Request No. 8

Representative documents that detail the warranty and extended warranty coverage offered by CCFT are enclosed herewith.

Request No. 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 CCFT 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 CCFT is planning to issue within the next 120 days.

Additionally, ODI is aware of a service bulletin published on CCFT's website, "Technical Service Bulletin Veriflo Adjustment 8-17-23," that does not appear to have been previously provided to the agency in accordance with 49 C.F.R. § 579.5 Manufacturer Communications. Please produce copies of all such required documents via the Manufacturer Communications Portal, or provide a date by which time CCFT will be in compliance. Please describe the business process and quality controls CCFT has enacted, or plans to enact, in order to ensure compliance with the 49 C.F.R. § 579.5 reporting requirements.

Response to Request No. 9

Based on a search of information systems and discussions with personnel familiar with potentially responsive communications, CCFT did not identify any service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles.

With respect to certain customer communications that are required to be submitted under 49 CFR 579.5, CCFT has submitted the service bulletin, "Technical Service Bulletin Veriflo Adjustment 8-17-23," through NHTSA's MCP. Following an audit of its customer communications, CCFT only identified the Veriflo Adjustment communication as responsive to Part 579.5. CCFT has engaged an outside law firm to train personnel and, as necessary, will implement additional policies to ensure compliance with this requirement on an ongoing basis.

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