Cummins Clean Fuel Technologies
PE25003-01
6 Jun 2025

Natural Gas Fuel Systems, LLC dba Cummins Clean Fuel Technologies
Second 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.* On May 30, 2025, NHTSA granted a second request to extend the due date to respond to Request Nos. 1 and 13 by two additional weeks – until June 20, 2025.[2] Accordingly, CCFT is providing herewith its responses to Request Nos. 10-12.

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. 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

[1] *See,* "Memo Granting IR Response Extension Request for PE25003-01" (May 21, 2025).
[2] *See,* "Memo Granting IR Response Extension Request for PE25003-01" (May 30, 2025).

conducted, are planned, or are being planned by, or for, CCFT. 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 to Request No. 10

In accordance with 49 CFR Part 512, information in response to Request No. 10 is contained in CCFT's request for confidential treatment in the folder named "CCFT Response to IR PE25003-01 Req. No. 10_CBI." The folder includes summaries of responsive actions in the file named "CCFT Response to IR PE25003-01 Req. No. 10_CBI.pdf" and supporting documents.

With respect to "all document related to the action," CCFT is providing written reports and summaries created during the normal course of business that are not subject to the attorney-client privilege. CCFT is not providing informal notes that may have been taken by personnel related to these actions.

Request No. 11
Describe all modifications or changes made by, or on behalf of, CCFT in the design, material composition, manufacture, quality control, supply, or installation of the subject components, 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 subject component 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 CCFT is aware of which may be incorporated into vehicle production within the next 120 days.

Response to Request No. 11

In accordance with 49 CFR Part 512, information in response to Request No. 11 is contained in CCFT's request for confidential treatment in the files named "CCFT Response to IR PE25003-01 Req. No. 11_CBI.xlsx" and "CCFT CONF Written Response to IR PE25003-01 Req. No. 11_CBI.pdf."

Request No. 12

State the number of each of the following that CCFT has sold that may be used in the subject vehicles by component name, part number and month/year of sale (including the cut-off date for sales, if applicable):

a. Replacement CNG fuel containers; and
b. Any kits that have been released, or developed, by CCFT for use in service repairs to the subject component/assembly to address the alleged defect condition.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number).

Response to Request No. 12

In accordance with 49 CFR Part 512, documents in response to Request No. 12 are contained in CCFT's request for confidential treatment in the file named "CCFT Response to IR PE25003-01 Req. No. 12_CBI.xlsx." Please note that the spreadsheet lists all mounting positions and sales, including for reasons unrelated to boss cracks. Additionally, the Part 512 request includes a confidential description of the information contained in the spreadsheet in the file named "CCFT Conf Summary of Response to IR PE25003-01 Req. No. 12_CBI.pdf."

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