Cummins Clean Fuel Technologies
PE25003-01
June 20, 2025

Natural Gas Fuel Systems, LLC dba Cummins Clean Fuel Technologies
Final 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. 1 and 13.

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. 1

State the number of subject vehicles CCFT has equipped with subject and/or peer components. Separately, for each subject vehicle equipped to date by CCFT, state the following:

a. *Vehicle identification number (17-character VIN);*
b. *Make;*
c. *Model;*
d. *Model Year;*
e. *For each component system type (e.g. side-mount, back-of-cab, front-of-body, roof-mount, tailgate, other), provide type, part number and serial number installed as original equipment;*

[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).

f. For each component system type, provide quantity and model numbers of the Luxfer CNG Type 4 fuel containers installed as original equipment;
g. Date CCFT warranty coverage commenced (MM/DD/YYYY);
h. The customer or fleet name listed on the CCFT purchase order; and
i. The customer or fleet State in the United States listed on the CCFT purchase order
j. (postal abbreviation).

Response to Request No. 1

CCFT is providing responsive information based on the data within CCFT's control and which is reasonably available. Because CCFT is not the vehicle manufacturer, CCFT determined the VIN, make, model, and model year based upon the information routinely recorded by CCFT. With respect to the VIN for vehicles on which CCFT's CNG systems were installed, CCFT's practice is to record the last six characters of the VIN. Where CCFT could reasonably determine the 17-character VIN, CCFT has provided the full VIN. With respect to the vehicle make, model, and model year, CCFT is providing the make and model where known. Because CCFT does not routinely record the model year, the response does not include that information; CCFT did not use a third-party system (such as NHTSA's VIN look-up tool) to determine data missing in its files.

Because the date upon which warranty coverage commenced necessarily references the *vehicle sales date*, CCFT is providing the vehicle in-service date, where known. With respect to the customer or fleet name on the purchase order, CCFT is providing the names as recorded in its information systems.

In accordance with 49 CFR Part 512, information in response to Request No. 1 is contained in CCFT's request for confidential treatment in the file named "CCFT Response to IR PE25003-01 Req. No. 1_CBI.xlsx."

Request No. 13

Furnish CCFT's assessment of the alleged defect in the subject vehicles, 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, including whether any resulting violation of 49 C.F.R. § 396.3 that meets the Commercial Vehicle Safety Alliance (CVSA) North American Standard Out-Of-Service Criteria due to any CNG fuel leakage, represents a safety defect per se;
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 to Request No. 13

In accordance with 49 CFR Part 512, CCFT's confidential response to Request No. 13 is contained in CCFT's request for confidential treatment in the files named "CCFT Response to IR PE25003-01 Req. No. 13_CBI.pdf."

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