



411 East Wisconsin Avenue  
Milwaukee, Wisconsin 53202-4497  
Tel 414.277.5800  
Fax 414.271.3552  
www.quarles.com

Attorneys at Law in  
Phoenix and Tucson, Arizona  
Naples and Boca Raton, Florida  
Chicago, Illinois (Quarles & Brady LLC)  
Milwaukee and Madison, Wisconsin

Writer's Direct Dial: 414.277.5117  
Writer's Fax: 414.978.8640  
Email: dhanraju@quarles.com

OYE-066 (273)

September 3, 2004

**VIA FACSIMILE AND U.S. MAIL**  
202.366.7882

Mr. Kenneth N. Weinstein  
Associate Administrator for Safety Assurance  
National Highway Traffic Safety Administration  
400 7th Street, SW  
Washington, DC 20590

Mr. Jon White, Chief  
Defects and Recall Information Analysis Division  
National Highway Traffic Safety Administration  
400 7th Street, SW  
Washington, DC 20590

Re: Notice of Recall

RECEIVED  
2004 SEP -1 P 12:55  
DEFECTS INVESTIGATION

Dear Messrs. Weinstein and White:

On behalf of the Eaton Hydraulics, Inc., and pursuant to 49 C.F.R. § 573.6, I am providing notice to your office that Eaton, as a manufacturer of motor vehicle equipment, has discovered a stability issue concerning a manifold valve, MCD 7810, Rev "G", part number 02-198616, part of motor manifold assembly 100AT00002A, which it manufactured and assembled as part of a manifold system it sold to a distributor, Cross Fluid Power.

Malfunctioning of this valve could result in a reduction in power-assisted steering for operators of vehicles incorporating this specific valve-manifold design. Although such a reduction in power-assisted steering does not affect the manual steering control, and thus, would not result in a loss of steering, Eaton has decided to initiate a recall in accordance with its own stringent safety standards, because such a reduction in power-assisted steering could affect the performance of motor vehicles incorporating this design.

Messrs. Kenneth N. Weinstein  
and Jon White  
September 3, 2004  
Page 2

Eaton has already identified the recall population, which is comprised of approximately 220 commercial buses, which were manufactured by North American Bus Industries, Inc. and purchased by the Massachusetts Bay Transportation Authority. Also, Eaton has already issued a service bulletin to the distributor, Cross Fluid Power, directing that the valve-manifold design in question be retrofitted by installing an orifice, 02-163136 or its equivalent.

In accordance with the requirements of 49 U.S.C. §§ 30118-21 and 49 C.F.R. Part 573, *et seq.*, Eaton is currently in the process of drafting the Defect and Noncompliance Report, which it will file with your office in due course, along with its service bulletin and proposed owner notification letter.

Please feel free to call me with any questions.

Sincerely,

QUARLES & BRADY LLP



Daniel L. Hanrahan  
*on behalf of Eaton Hydraulics, Inc.*

DIH/mkr

cc: Gail L. Cudak, Esq., Eaton Corporation

**Schuler, Kelly**

---

**From:** Allen, Dan [dan.allen@nabiusa.com]  
**Sent:** Wednesday, September 15, 2004 3:32 PM  
**To:** Schuler, Kelly  
**Subject:** Eaton recall

After your call this morning I have investigated the Eaton recall and offer the following:

It appears that this time to be limited to a quantity of 297 NABI Model 40LFW city transit buses. These were built in 2 lots of 122 and 175 respectively exclusively for the Massachusetts Bay Transportation Authority (Boston) in the fourth quarter of 2003 and 2004.

We will investigate further and I anticipate that NABI will initiate a recall of these buses in the near future.

This e-mail transmission, including any attachments, contains information of North American Bus Industries, Inc. and may be confidential, proprietary, copyrighted and/or legally privileged. This electronic transmission is for the sole and exclusive use of the named individual or entity to which it is directed and may not be transmitted to or received by anyone other than the named addressee (or a person authorized to deliver it to the named addressee). Access to this email by anyone else is unauthorized. If you are not an intended recipient, you must not read, use or disseminate the information contained in the email. If you have received this message in error, please immediately return this by e-mail and delete it.

Any views expressed in this transmission are those of the individual sender and not the Company, unless the sender is an authorized agent of North American Bus Industries, Inc. and is expressly speaking on its behalf.