



A CNV Holdings Company

April 19, 2004

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

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Subject: Notice of a Noncompliance with Federal Motor Vehicle Safety Standard No 101 and 105 Pursuant to 49 CFR Part 573.

Dear Mr. Weinstein:

Workhorse Custom Chassis L.L.C. has decided that a noncompliance which relates to Federal Motor Vehicle Safety Standards 101 and 105 exists in certain of their incomplete vehicle chassis and is furnishing notification to NHTSA in accordance with 49 CFR Part 573, Defects and Noncompliance Reports.

The noncompliance exists in Workhorse Custom Chassis (Workhorse) incomplete Motorhome and Commercial chassis manufactured with Actia Corporate Instrument Clusters. All the incomplete Motorhome and Commercial chassis were built between July 15, 2003 and February 9, 2004. Incomplete vehicle chassis manufactured after that date do not have the noncompliance.

Actia Corporation
52765 Bridger Court
Elkhart, IN 46514
Tel: (574) 266-2605

Workhorse manufactured approximately 10,487 vehicles with the Actia Corporate Instrument Cluster. Workhorse believes that all vehicles built during this time with the Actia Instrument Cluster contain the noncompliance in question.

The cluster specification calls for activation of the Brake Failure warning message, audible alarm and warning light when there is a low brake fluid level condition (where applicable) or brake differential pressure problem. The Brake fail icon is shared with the park brake, but uses a different input to the cluster through a diode. If the Brake Fail input on the cluster (pin 15) falls below a voltage of 1.5V, according to specification, the brake failure lamp and alarm will be activated. This was successfully introduced in MY03. For MY04 this specification was mistakenly changed from a 1.5V threshold to a new threshold of only 0.5V. The result is that the Brake Failure warning message, audible alarm and warning light is not activated in the event of a fault condition, since the minimum voltage generated by a fault condition is 0.7V, which is higher than the cluster's threshold of 0.5V.

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Workhorse is also presently investigating a possible issue with the ABS telltale. If a problem is identified, Workhorse will amend its present 573 letter to include the ABS telltale and adjust the dates, if necessary. The remedy should be the same for both issues.

Workhorse intends to establish a program for remedying the defective Actia Instrument Cluster. The exact date of sending out notifications is not known at this time, but we will notify you as soon as the date is determined.

Copies of communications to dealers and customers will be provided to you shortly. Workhorse has assigned the following campaign number to this matter **50402-C**.

Sincerely,

Dave Bigg

Certification and Compliance
(765) 964 2364

Concur: John Buttrey

Vice President Engineering

cc David Feldman - WCC
Jack Rice - Arent Fox