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DEFECTS INVESTIGATION



June 14, 2004

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

Subject: Amendment to Notice of a Noncompliance with
Federal Motor Vehicle Safety Standards No. 101 and 105 pursuant
To 49 CFR Part 573 (Recall No. 04V195000)

Dear Mr. Weinstein:

On April 19, 2004, Workhorse Custom Chassis LLC notified you that it had determined a noncompliance which relates to Federal Motor Vehicle Safety Standards 101 and 105 existed in certain of their incomplete vehicle chassis. We also notified you that we were investigating a possible issue with the ABS telltale and that if a problem were identified, we would amend the present 573 letter. We have now determined that there is a problem with the ABS telltale and are notifying you of that fact.

The added noncompliance exists in Workhorse Custom Chassis (Workhorse) Front Engine Gasoline incomplete motor home and commercial chassis manufactured with Actia Corporate Instrument Clusters. All of the incomplete motor home and commercial chassis were built between 15 July 2002 and 20 May 2004. Incomplete vehicle chassis manufactured after that date do not have the noncompliance.

Workhorse has now determined that approximately 30,345 vehicles were manufactured with the noncomplying ABS telltale. FMVSS 101 and 105 specification calls for activation of the ABS tell tale when the ABS is not properly functioning. This does not always occur.

MY2003 and MY2004 vehicles equipped with TRW 3 and 4 channel ABS units are to be inspected for a possible failure in activating the ABS telltale in the event of an ABS error. Motorhome and Commercial Chassis were manufactured with a possible defect from the start of MY2003 production (15 July 2002) until May 20, 2004.

The ABS input to the cluster is driven from a dedicated output on the ABS Module, reserved for the ABS control unit only. If the ABS input on the cluster goes below a voltage of 1.4V according to specification, the ABS warning lamp will be activated. Due to a difference in



tolerances between the 3 and 4 channel ABS units as well as difference between chassis to chassis, a situation can occur where the input voltage from the ABS unit exceeds the 1.4V limit with the result that no warning will be activated. The specification was amended shortly after discovering that a possible non-compliance situation exists. The new software upgrade for the cluster will change the activation level to the required voltage.

Workhorse intends to establish a program for remedying the noncomplying ABS telltale. The exact date for sending out notifications is not known at this time, but we will notify you as soon as the date is determined. It should be shortly.

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

Sincerely,

Dave Bigg

Compliance Manager

Concur:

John Buttrey

Vice President Engineering

Cc: David Feltman – WCC
Jack Rice – Arent Fox