



GILLIG CORPORATION

BOX 3008
HAYWARD, CALIFORNIA
94540-3008
TELEPHONE 510/785-1500
FAX # 510/785-6819

NOV 28 P 4: 53

DEFECTS INVESTIGATION

December 21, 2004

Mr. Kenneth Weinstein
Associate Administration for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street SW
Washington DC 20590

04V-610
(18 pages)

Re: Defect Report on Front Axle Tie Rod Clamp on Arvin Meritor Axles
With Urres Ko Clamps

Dear Mr. Weinstein:

In accordance with the procedures outlined in 40CFR5736, Gillig is submitting the attached Safety Defect Information Report. Gillig was notified on December 15, 2004, by Arvin Meritor, Inc, about a material defect on front axle tie rod ends that could result in potential separation that could effect steering.

The defect effects 324 Gillig buses manufactured in 2004. Gillig has provided a VIN and customer contact listing to Arvin Meritor. Arvin Meritor will conduct the recall.

Sincerely,

GILLIG CORPORATION

Charles E. Koske
Senior Vice President, Engineering

CEK/vo
Attachment

cc: R. Birdwell

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report¹

On December 15, 2004, Gillig Corporation [MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. _____) exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: December 21, 2004

Furnish the manufacturer's identification code for this recall (if applicable): _____

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Gillig Corporation 25800 Clawiter Road Hayward, Ca 94545

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Charles E. Koske Sr. Vice President Engineering

Telephone Number: (510) 264-5031 Fax No.: (510) 264-3897

Name and Title of Person who prepared this report.

Charles E. Koske

Sr. Vice President Engineering

Signed: _____

¹ Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5227 or by FAX at (202) 366-7882.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): Gillig **Model Years Involved:** 2004 **Model(s):** Low Floor and Phantom

Production Dates: Approx. July-Nov, 2004

VIN Range: : not significant – use of the specific ArvinMeritor axle is the determining factor

Vehicle Type: Bus **Bodystyle:** Low and High floor buses

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Use of specific front axles supplied by ArvinMeritor with Urresko clamps in the date period identified by ArvinMeritor by serial number

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

Approximately 85% of Gillig buses built during the time period had the specified axles.

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Model	Year	Number of Vehicles Potentially Involved
Phantom	2004	81
Low Floor	2004	243

Total Number Potentially Affected by the Recall: 324

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: _
See attached ArvinMeritor and Urresko 573 reports – our understanding is 93% of the total population is defective.

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

Cross reference between Gillig serial numbers and axle serial numbers provided by ArvinMeritor

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

Per ArvinMeritor and Urresko form 573s a defect could exist in the tie rod end clamps of the front axle. See attached ArvinMeritor and Urresko form 573s.

Describe the cause(s) of the defect or noncompliance condition.

Per the ArvinMeritor and Urresko form 573s the cause is the material strength of the clamps may not be to specification due to incorrect processing and heat treatment. See Attached 573s.

Describe the consequence(s) of the defect or noncompliance condition.

Per the ArvinMeritor and Urresko form 573s the clamp could fail and lead to a steering malfunction.

Identify any warning which can (a) precede or (b) occur.

Urresko claims there would be misalignment and it would be noticed during inspection. We believe it is possible under some conditions for the clamp to pullout in normal driving. This clamp is not subject to routine service and inspection as indicated by Urresko. In typical service it would be checked once or twice a year.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

The Axle is purchased from ArvinMeritor, Inc

ArvinMeritor, Inc.
2135 West Maple Road
Troy, Michigan 48084-7186

Per ArvinMeritor's Form 573 the clamp originated with Urresko

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Mr Niran Audimoolam Project Manager, Product Safety and Compliance

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

See attached ArvinMeritor and Urresko 573 reports. Gillig was notified by ArvinMeritor via e-mail on December 15, 2004.

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

ArvinMeritor will conduct a Safety Recall Campaign per their 573 report

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

See attached Urresko 573 report which claims part will be marked for identification.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

Per the Urresko 573 report the heat treat process was corrected on August 31, 2004.

VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Gillig has already supplied ArvinMeritor the Vehicle serial numbers and contact information to enable them to conduct the recall.

VII. Furnish Recall Communications

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

The Privacy Act of 1974 - Public Law 93-579, As Amended: This information is requested pursuant to the authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response maybe used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administration enforcement or litigation against a manufacturer, your response, or statistical summary thereof, may be used in support of the agency's action



2135 W. Maple Rd.
Troy, MI 48084

arvinmeritorinc.com

November 24, 2004

National Highway Traffic Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590
Attention: Associate Administrator of Enforcement

Fax: 202-366-7882

Re: Defect Information Report relating to certain tie rod clamps shipped to ArvinMeritor between July 1, 2004 and August 31, 2004, by supplier Urresko, s.a. de c.v.

ArvinMeritor File: None

NHTSA File: Not Assigned

Ladies & Gentlemen:

Urresko, s.a. de c.v. has notified ArvinMeritor that Urresko has determined a defect, which relates to motor vehicle safety exists in certain tie rod clamps that were shipped to ArvinMeritor between July 1, 2004 and August 31, 2004.

Information Requested under §573.6(c)(1)

This report is submitted by:

ArvinMeritor, Inc.
2135 West Maple Road
Troy, Michigan 48084-7186

Information Requested under §573.6(c)(2)

This report covers the following axle models:

17110	FG941	MFS18
17111	FG943	MFS20
FF946	FG952	
FG941	FH941	
FG943	FH946	
FG952	FL951	

Urresko, s.a. de c.v., 8210 Garfield Road; Mentor, Ohio 44060, shipped these suspect tie rod clamps to ArvinMeritor between July 1, 2004 and August 31, 2004. Please refer to Urresko Defect Information Report for basis of determining the scope of suspect population. The above mentioned axles with the suspect tie rod clamps were shipped to customers listed in Appendix A of this notice between July 1, 2004 and November 3, 2004.

Information Requested under §573.6(c)(3)

ArvinMeritor estimates approximately 1162 axles are affected by the suspect tie rod clamps supplied by Urresko.

Information Requested under §573.6(c)(4)

Please refer to Urresko, s.a. de c.v. Defect Information Report

Information Requested under §573.6(c)(5)

Please refer to Urresko, s.a. de c.v. Defect Information Report

Information Requested under §573.6(c)(6)

Please refer to Urresko, s.a. de c.v. Defect Information Report

Information Requested under §573.6(c)(7)

This issue does not involve non-compliance with a motor vehicle standard.

Information Requested under §573.6(c)(8)

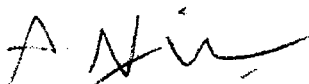
ArvinMeritor is in process of developing the Defect Information Notice to its customers and will submit that information to NHTSA as soon as available. ArvinMeritor is continuing to work with Urresko and customers to determine availability of replacement product and the timing of customer notification.

Information Requested under §573.6(c)(9)

We trust that the information provided in this document is fully responsive to the requirements of 49 CFR §573.5. All additions or modifications to any of the information given will be reported promptly to NHTSA. Any questions with respect to the information provided should be directed to the undersigned.

Respectfully Submitted,

ArvinMeritor



Niran Audimoolam
Project Manger
Product Safety and Compliance

**APPENDIX A
LIST OF AFFECTED CUSTOMERS AND QUANTITIES**

OEM	Quantity
Autocar 551 S. Washington Street Hagerstown, IN 47346 Attention: Tonya Dearth – 765-489-6051	5
Capacity of Texas 401 Capacity Drive Longview, TX 75604 Attention: David Galasha – 800-323-0135	1
Eldorado National 9670 Galena Street Riverside, CA 92509 Attention: Brian Ethier – 909-591-9557	25
Gillig Corporation Box 3008 Hayward, CA 94540-3008 Attention: Bob Birdwell – 510-785-1500	311
JLG Industries (formerly Gradall Company) 1 JLG Drive McConnellsburg, PA 17233 Attention: Eric Sovak – 717-485-5161	51
HME Inc. 1950 Byron Center Avenue Grand Rapids, MI 49509 Attention: Greg Brock – 616-534-1463	16
Kalmar Industries Corp. 1301 Cherokee Trace White Oak, TX 75693 Attention: Ron Gage - (903) 759-5490	1
Kovatch Mobile Equipment One Industrial Complex Nesquehoning, PA 18240 Attention: John Kovatch - (800) 235-3928	35
Motor Coach Industries (MCI) 1475 Clarence Avenue; Door 10, NPD Winnipeg, Manitoba R3T 1T5, Canada Attention: Paul Murphy - (204) 287-4982	164
NABI 106 National Drive Anniston, AL 36207 Attention: Chris Maye - 256-241-2454	199
Neoplan USA Corporation 700 Gottlob Auwaeter Drive Lamar, CO 81052 Attention: Rich Burn – 303-563-8231	52

OEM	Quantity
NovaBus 1000 Boul. Industriel St-Eustache, Quebec J7R 5A5, Canada Attention: Andre Labelle – 450-974-6022	9
Optima Bus P.O. Box 19140 Wichita, KS 67204-9140 Attention: Vicki Hobbs – 316-779-7700	44
Orion Bus Industries Inc. 165 Base Road Oriskany, NY 13424-0748 Attention: Tony Domobyl – 336-878-5429	229
Pierce Manufacturing 2600 American Drive P.O. Box 2017 Appleton, WI 54912 Attention: Mark Meaders - 920-832-3231	3
Spartan Motors, Inc. 1165 Reynolds Road Charlotte, Mich. 48813 Attention: Jeff Seal - 517.543.6400	1
Sunny D Manufacturing 4343 Highway 39, Klamath Falls, OR 97603 Attention: Ed – 541-884-2361	4
TICCO Manufacturing 746 Wheaton Street Savannah, GA 31403 Attention: Barry Melton – 912-232-3798 cc: Axle Tech International	12
1005 High Street Oshkosh, Wisconsin 54901 Attention - Robert Crooks -920-424-5320	

VIA FACSIMILE (202) 366-7882
AND UNITED STATES MAIL

Associate Administrator For Safety (NSA-01)
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC 20590

ATTENTION: George Person

RE: Urresko, s.a. de c.v. 753 Defect Report, November 18, 2004

On November 12, 2004, Urresko, s.a. de c.v. decided that a defect which relates to motor vehicle safety exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573

Date this report was prepared: November 18, 2004

Furnish the manufacturer's identification code for this recall: Not Applicable

1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. § 30164.

Name of manufacturer: Urresko, s.a. de c.v.

Designated Agent: Jorge Martin Sylvester
8210 Garfield Road
Mentor, Ohio 44060

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Sr. Santiago Aguirre Felix
Managing Director

Telephone Number: 011 52 55 58 76 06 75 Fax No.: 011 52 55 58 76 04 60

Name and Title of Person who prepared this report.

Sr. Santiago Aguirre Felix
Managing Director

Signed: _____

I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall: *(provide illustrations or photographs as necessary to describe the item of equipment:*

Generic name of the item: tie rod clamp (See Exhibit A)

Make: Not Applicable

Part Number: CL 2225

Function: There are two tie rod clamps on each tie rod assembly that confirm the tie rod does not unscrew from the cross tube

Other information which characterizes/distinguishes the items of equipment to be recalled:

Shipped exclusively to Arvin Meritor, Inc. (ARM) between July 1, 2004 and August 31, 2004.

Preproduction approval parts were shipped June 18, 2004.

Generic name of the item: tie rod clamp (See Exhibit B)

Make: Not Applicable

Part Number: CL 185

Function: There are two tie rod clamps on each tie rod assembly that confirm the tie rod does not unscrew from the cross tube

Other information which characterizes/distinguishes the items of equipment to be recalled:

Shipped exclusively to ARM between July 1, 2004 and August 31, 2004.

Preproduction approval parts were shipped June 18, 2004.

Make: Not Applicable

Part Number: CL 817755N (See Exhibit C)

Function: There are two tie rod clamps on each tie rod assembly that confirm the tie rod does not unscrew from the cross tube

Other information which characterizes/distinguishes the items of equipment to be recalled:

Shipped exclusively to ARM between July 1, 2004 and August 31, 2004.

Preproduction approval parts were shipped June 18, 2004.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents.

93%

II. Identifying the Recall Population

3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.

Part Number	Year	Number of Items Potentially Involved
USK-CL2225	July, August 2004	1276 clamps
USK-CL 185	July, August 2004	288 clamps
USK-817755N	July, August 2004	606 clamps

Total Number Potentially Affected by the Recall:

2170 clamps

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect:

2170 clamps out of 2334 clamps

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:

It has been determined that one batch of steel did not follow the established process and was heat treated. Pursuant to a julian date coding system this batch has been identified to have been shipped between July 1, 2004 and August 31, 2004 to ARM. Preproduction approval parts were shipped June 18, 2004.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

Urresko manufacturers a clamp that is installed on tie rod assemblies. The defect identified to date is the failure by cracking of one such clamp. Urresko has not been able to duplicate the failure although 1400 clamps have been torqued to specification and 200 clamps were torqued twice to specification.

Describe the cause(s) of the defect or noncompliance condition.

An identifiable batch of steel was heat treated which was outside the normal process for manufacturing the clamps. The heat treat process created surface hardness that could lead to a fracture of the clamp.

Describe the consequence(s) of the defect or noncompliance condition.

Two clamps are on each tie rod assembly. The purpose of a clamp is to confirm the tie rod and cross tube threaded connections at both ends of the tie rod. If both clamps were to fail the tie rod and cross tube would remain in tact for an extended period of time. However, if they started to unscrew significant vehicle misalignment would evolve over an extended period of time with the potential for the tie rod end to separate from the cross tube which would affect steering.

Identify any warning which can (a) precede or (b) occur.

Misalignment would precede failure and occur calling for service. Further, Urresko believes any failure of a clamp would be identified during normally scheduled service or inspection.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Not Applicable.

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Not Applicable.

IV. Provide the Chronology in Determining the Defect/Noncompliance

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

10/27/04	Urresko notified of only on clamp failure.
11/01/04	First conference between Urresko and ARM team.
11/03/04	Preliminary metallurgical information to Urresko.
11/04/04	Urresko sends 260 CL2225 replacement clamps to ARM.
11/04/04	Urresko determines final population.
11/05/04	Urresko torques 1400 clamps at 80 ft lb and finds no failure. All of these clamps belong to the same heat treated batch of the failed part.
11/08/04	Urresko received failed clamp
11/12/04	After completing examination of failed clamp, root cause analysis determination of defect.
11/12/04	Urresko shipped 288 CL185BIS replacement clamps and 564 USK817755 replacement clamps to ARM.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

Not Applicable.

V. Identify the Remedy

8. Furnish a description of the manufacturers remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

Clamps are no longer heat treated. Urresko returned to manufacturing without heat treating.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The remedy clamp is not heat treated and marked for identification.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The first date of heat treating was June 11, 2004 with the first shipment July 1, 2004. (Note preproduction approval parts were shipped on June 18, 2004). The last heat treating was July 8, 2004 and shipment on August 31, 2004. Since August 31, 2004, there have been no heat treated shipments. The production remedy is identical to the field remedy.

VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Urresko is a Tier 2 manufacturer and sells the clamps only to ARM the Tier I manufacturer. Urresko has notified ARM of the root cause and determination of the Part 573 defect when the determination was made on 11-12-04

Urresko has agreed to ship to ARM as necessary replacement clamps with marking to define the new clamps.

Urresko has documented all part numbers where suspect clamps were used and identified their use to ARM.

Urresko has shipped to ARM 260 CL 2725 "remedy clamps" with mark to identify good part on November 4, 2004. ARM has reportedly segregated all heat treated clamps that have not gone to the field. Further, Urresko, on November 12, 2004 shipped 288 CL185BIS marked "remedy clamps" and 564 USK817755 marked "remedy clamps" to ARM.

Urresko is ready to ship in early December at ARM's request, additional remedy replacement clamps with identification markings.

Urresko is to prepare service instructions for proper change out of clamps.

VII. Furnish Recall Communications

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

Urresko sold these and shipped the heat treated clamps to only one entity, ARM

Not applicable.