



Structural Composites Industries

Memorandum

Kelly Schuler
National Highway Traffic Safety Administration
400 Seventh St, S.W.
Washington, D.C. 20590

RECEIVED

June 29, 2004

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Re: Recall No. 04E-038

DIVISION OF DEFECTS
INVESTIGATION

Kelly,

As we discussed, SCI completed prototype testing of several potential recall remedies, and we determined that a mid-span pressure relief device would be the optimum remedy for a field retrofit program.

We also formally notified Orion Bus of the voluntary recall and I visited them on June 23, 2004 to discuss the recall program in detail. During this visit, Orion Bus provided SCI with a complete list of all affected bus owners (transit agencies), their contact information, and the affected bus VIN's. In addition, Orion Bus advised us that transit agencies tend to ground their bus fleets when notified of safety related non-compliance. In the past, this has disrupted commuter service and sometimes caused undue alarm among various interest groups and local media. As explained below, this might be an understandable course of action for transit bus owners, but based on the nature of this particular non-compliance, we believe it would be a great overreaction and perhaps not in the best public interest.

As indicated in our test reports submitted to NHTSA and in our draft 573 report, we believe there is no immediate safety risk due to the non-compliance. In particular, the fuel tank assembly functioned as expected and in compliance with FMVSS 304 when tested with a representative fuel system enclosure. It is also noted that transit agencies do not remove the fuel system enclosure when operating the buses, the fuel system enclosure doors are not removable, and the fuel system enclosure doors are normally opened only when performing maintenance inspections. For these reasons, SCI believes the public would be best served if notification is made when field ready parts are available, instead of July 16 as originally planned. Please note that this is a request to postpone notification, and not a request to postpone implementation of the field remedy.

We are currently waiting on quotes for the parts comprising the mid-span pressure relief device remedy. These parts are functionally equivalent to the prototypes we tested, but they must also be designed with greater durability and more precise tolerances to survive long term transit bus service. The parts generally consist of tube segments, tube fittings and connectors, mounting brackets, and high pressure seals. The parts are not new technology, but some have different dimensions compared to standard catalogue items. For this reason, vendors do not stock some of the parts and tooling might have to be developed for manufacturing the parts. In addition, because some parts will be special made, SCI believes it would be prudent to trial fit several mid-span pressure relief device assemblies to make sure they fit together as designed. We still believe the first group of field ready parts will be available in mid-September as originally planned, although we are awaiting confirmation of our vendors' lead time.

In view of the above, SCI respectfully requests that owner notification take place when field ready parts are available. Pending confirmation from the part vendors, we believe this will be in mid-September according to our original implementation schedule.

John Coursen