



26 February, 2007

George Person
Chief, Recall Management Division
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Ave. SE,
Washington, DC 20590

Subject: Recall 04V-042 – New Flyer D60HF Center Axle Lock-up
Revision to Proposed Recall Resolution

Dear Mr. Person:

A development has occurred which requires that we re-notify both yourself, and our customers with regards to the resolution for the subject recall.

Last year during the procurement process of obtaining sufficient parts to install the warning system for this recall resolution (as described in my letter of 27 Feb 07), we received information from Power Brake LLC of Florida, that they had successfully completed dynamometer testing on one of the parallel resolution projects.

Power Brake has, over the last few years, developed a treatment process for brake drums and rotors which is currently in use with many different vehicle fleets on the eastern coast. The treatment process addresses the issue of brake linings adhering to brake drums/rotors, which is the root cause for this recall. In February when we declared that we would incorporate a warning system to notify the driver of an occurrence of brake lock-up, Power Brake was still in the testing phase to develop a formula for their process which would work with the typical lining materials currently in use by the Transit Industry. Power Brake was conducting testing to prove that this treatment process could be applied to the standard New Flyer OEM supplied and approved brake drums.

Upon notification by Power Brake of the successful testing, New Flyer suspended the implementation of the warning system, which did not address the root cause of the issue, to assess the potential of using the treated brake drums as a solution.

The advantages of this simplified resolution, if it proved out, would be as follows. First, it would provide a simple component replacement, which is more in-line with the desires of NHTSA staff I have spoken with, for a recall resolution involving vehicle brake systems. It would reduce the number of new parts for our customers to keep in stock. It would remove the requirement for

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customer training to maintain and service the new components/systems associated with the original warning system resolution. And lastly, the treated brake resolution would cost less for our customers to maintain over the life of the vehicles.

In late August to early September, New Flyer conducted successful 121 Duty Cycle testing at the Link-Radlinski Test facility in East Liberty Ohio, on a customer vehicle equipped with the treated brake drums installed on the center axle. This testing was followed by the successful completion of our standard salt spray testing, which we developed over the course of this recall project.

New Flyer engineering had assessed the 121 test reports from both the track and dynamometer testing, and had given the approval to incorporate the treated brake drum as a resolution for this recall. All that remained at that time was to notify the customers of the change to the resolution process, and gather sufficient quantities of both the treated brake drums, brake chambers, and certified brake lining materials before implementation could begin. It was at that time that New Flyer was informed that Brake Pro had closed it's doors. The Brake Pro lining CMT24 was the lining of choice for proposed resolution, as it had been the material used in the dynamometer testing.

Dynamometer testing then ensued on different brands of brake linings from several manufactures to ensure we are not using a sole source supply, also differing configurations of brake chambers and slack adjuster types were tested. We currently have two brake lining materials which will work with the treated drums, and the new Affinia controlled Brake Pro is again supplying the original lining materials approved for this action. Which returns New Flyer to the re-notification stage.

The final corrective action incorporates a 30/30 long stroke brake chamber (to replace the existing standard stroke chambers), the treated brake drums as described above, and new brake linings, on the center axle of our customer's vehicles.

To ensure that our customers do not mix the new brake drum with their regular stock, the New Flyer part number for the treated brake drums, 6327402NFA3, will be painted to the exterior of the drum, additionally the drums will have a 1.0" red band painted around the circumference of the drum. Power Brake will also have a formula identification code and batch code physically stamped into the wheel-to-drum mating surface of the brake drum.

The first shipment of treated brake drums is available to be shipped now and incorporation at our customer sites will begin shortly thereafter. Please find attached Revision B to the PART 573 Defect and Noncompliance Report, as well as the associated Instruction to Service for installing the new brake drums and linings.

Sincerely



Kerry B. Legg
Safety & Compliance Manager
Customer Services Head Office
(204) 934-4876

cc: Hans Peper, Cliff Murray, Mark Oleski, Scott Halbesma, Don Bean,
Bernie Hedja, John Elder, Todd Sutherland, Jim Heuchert, Dixon Davies

Enclosure: Revision B to the PART 573 Defect and Noncompliance Report
Customer Notification Letter - Draft
Instruction to Service ITS3467 - Draft