



05V-072
(3 pages)

February 9, 2005

George Person (NVS-215)
Chief of Recall Management
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street SW
Washington DC 20990

Vehicle Recall 05V-072 Suspension Seat Tethers

Dear Mr. Person:

Pierce has decided that a defect exists in certain suspension seat tethers used on certain Pierce custom chassis. We therefore furnish notification of a defect to the National Highway Traffic Safety Administration, in accordance with 49 CFR Part 573, *Defect and Noncompliance Reports*.

Manufacturer's Identification Code: 39-0139830

1. Name of Manufacturer and Corporate contact:

Pierce Manufacturing Inc.
Roger Lackore, Director of Research and Development
Phone: 920 832-3249
FAX: 920 832-3092
E-Mail: rlackore@piercemfg.com

2. Identification of Vehicle Classification:

Make:	Pierce	
Model Years:	Quantum	1996 - 2004
	Dash	1998 - 2004
	Lance	1999 - 2004
	Enforcer	2001 - 2004
Models:	Quantum, Dash, Lance, Enforcer,	

Production Date Beginning:	Quantum	09-12-96
	Dash	10-05-98
	Lance	01-25-99
	Enforcer	02-23-01

Production Date Ending:	All Models	02-07-05
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3. Number of Potentially Affected Vehicles: 1600

4. Estimated Percentage of Vehicles Containing the Defect or Noncompliance: 100%

5. Description of the defect or non-compliance:

Suspension seat restraining tethers on certain chassis models and certain suspension seat options are too long to ensure compliance with FMVSS 207 "Seating Systems" requirements. The seat tether restrains the seat during pull testing as the suspension components are not designed to restrain the seat on their own.

6. Chronology of Principal Events:

- 09-12-96 New suspension seat options were introduced into the product offering without a necessary change to the tether length. These suspension seat offerings migrated into other chassis models under the assumption that the tethers were sized appropriately.
- 12-09-04 CMVSS 207 verification testing was initiated to validate compliance with the Canadian regulations. Some of these tests indicated that certain tether lengths allowed an excessive amount of seat deflection during the 4500 lb combined seat and seat belt pull test.
- 01-12-05 CMVSS 207 testing was completed, and analysis begun to determine which chassis models, model years, and suspension seat options would be affected. This study determined that only certain models of suspension seat and certain chassis models fail to comply with the CMVSS/FMVSS 207 requirements.

7. Test Results or Data on which the Noncompliance was Determined:

CMVSS 207 compliance testing.

8. Corrective Action:

Replace suspension seat tethers with shorter tethers.

9. Representative Notices:

Will be sent when complete.

Sincerely,
Pierce Manufacturing, Inc

A handwritten signature in black ink, appearing to read "Roger Lackore". The signature is stylized and cursive.

Roger Lackore, P.E.
Director of Research and Development