



GILLIG CORPORATION

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OFFICE OF
DEFECTS INVESTIGATION

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

March 15, 2005

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

05V-106
(15 pages)

Dear Mr. Weinstein:

In accordance with the procedures outlined in 40CFR 573.6 Gillig is submitting the attached Safety Defect Information Report. Gillig was notified on February 25, 2005 of a safety recall on Webasto heaters supplied to Gillig by Webasto Product North America, Inc. Webasto provided the heater serial numbers for the recall on February 25, 2005.

Gillig provided Webasto the cross reference listing of VIN numbers vs. heater serial numbers on February 28, 2005 and Webasto 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 February 25, 2005, Gillig Corporation decided that a defect which relates to motor vehicle safety.) exits 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: March 14, 2005

Furnish the manufacturer's identification code for this recall (if applicable): N/A

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 Hayward, California

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

Charles E. Koske Sr. Vice President

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

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 Corp **Model Years Involved:** 2004 **Model(s):** Low Floor

Production Dates: Beginning: March 9, 2004 **Ending:** August 26, 2004

VIN Range: Not significant due to low usage option – individual VIN’s attached

Vehicle Type: Bus **Bodystyle:** 29 and 35 foot low floor buses

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

Buses equipped with Webasto Model DBW 2010 heaters of the serial numbers provided by Webasto Products North America, Inc.

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.

100% per Webasto’s 573 Report

II. Identify the Recall Population

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

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
29 foot low floor	2004	8
35 foot low floor	2004	2

Total Number Potentially Affected by the Recall..... 10

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

Less than 10% per Webasto’s 573 Report

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:

Buses to be recalled were selected by mating Webasto supplied serial numbers to Gillig's installed component information. Webasto's definition is attached on their 573 report.

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.

Gillig has no knowledge of the alleged defect. See the attached Webasto 573 report.

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

Gillig has no knowledge of the cause of the alleged defect. See the attached Webasto 573 report.

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

Gillig has no knowledge of the consequence of the defect and if it applies in Gillig's installation. Webasto claims in their 573 report (attached) that it could present a safety problem.

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

Gillig has no knowledge of any warning. Webasto's 573 report lists two potential warnings (attached).

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

Webasto Products North America, Inc
15083 North Road
Fenton, Michigan
48430

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

Mr. Gary Pierce Vice President Operations and Product Services

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.**

On February 25, 2005 Gillig received a recall letter from Webasto.

Gillig received their form 573 letter from Webasto on March 3, 2005.

Gillig sent Webasto the list of Gillig Vehicles to be recalled on February 28, 2005.

Gillig is not aware of any incidents involving the Webasto device on Gillig buses and we have no reports of accidents, injuries, fatalities or warranty claims.

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.**

Webasto will replace the burner per their 573 report attached.

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

See Webasto's attached 573 report.

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 Webasto's 573 report all new production and distribution is certified as corrected.

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 sent Webasto the list of Gillig buses to be recalled on February 28, 2005.

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.

None have been supplied to Gillig by Webasto at this time.

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

Called Gary 3/7/05
Called Gary 6am
Called Gary 1:30pm
w/ST messages
about 573



February 24, 2005

Gillig Corporation
25800 Clawiter Road
Hayward, CA 94540

com to

Chum K.

Re: Safety Recall No. 05E-015

Dear Sir or Madam:

This Notice is sent to you in accordance with the requirements of the National Traffic and Highway Safety Act.

Webasto Product North America has decided that a defect which relates to motor vehicle safety exists in DBW 2010 and Scholastic coolant heaters, and service part burner tubes (PN. 303046/26533A) incorporated into coolant heaters, manufactured after November 2002 and prior to February 5, 2005.

Webasto has informed the National Highway Traffic Safety Administration about the possibility that the stainless steel walls of the burner tubes in the DBW 2010 and Scholastic coolant heater, in some cases, is made out of material that is not within specification and in those cases could fail prematurely. (A copy of that notification is attached.) If such a failure occurs, the surface temperature of the exhaust tube exiting from the heater can increase and could potentially ignite combustible materials in or around the vehicle which could cause personal injury. Vehicle occupants may notice an increase in noise relating to such an occurrence and may observe heat related discoloration of components of the heater's exhaust system.

Webasto recommends that the suspect burner tubes be replaced. Vehicles in which these coolant heaters have been installed should be repaired as soon as feasible. The repairs should be completed by the manufacturer's authorized repair facility.

Webasto Product North
America, Inc.

15083 North Road
Fenton, Michigan 48430
Phone (810) 593-6000
Fax (810) 593-6001

www.webasto.com
QS-9000 Registered



Identification of Affected Parts

This recall relates to Webasto Model DBW 2010 and Scholastic coolant heaters manufactured and sold by Webasto after November 2002. The suspect heaters have the following serial numbers:

100265 through 100959
194702
200040 through 200775
219442 through 219545
228868 through 229116
229716
300290
300905 through 302449
400212 through 402002
700000 through 704500
705501 through 706056
707001 through 707498
800000 through 801300
802002 through 802066

Replacement Parts

The remedy for the suspect Model DBW 2010 and Scholastic coolant heater will be to replace the burner tubes in those heaters with burner tubes that are within specification. Vehicle manufacturers' dealers may purchase replacement burner tubes directly from Webasto Product North America.

Labor and Handling Allowance

Webasto will allow 0.5 hours labor for each burner tube installed at the dealer's or fleet's normal hourly rates. Handling charges should not exceed 20% of the dealer's net cost of parts.

Removed Material Disposition

To obtain reimbursement for costs of parts, labor, handling and expenses associated with installing replacement burner tubes dealers should follow existing procedures for standard warranty. Webasto requires the return of the removed parts to Webasto in Fenton, Michigan. Upon submission of the claim, Webasto will issue a return goods authorization along with instructions for returning the parts.

Claims for Credit

Warranty claims for installing replacement burner tubes associated with this notice should contain the following information:

- Reference to NHTSA Campaign ID Number 05E-015
- The vehicle identification number (VIN)
- The heater serial number
- Date the service was provided
- The name, address and phone number of the repair facility

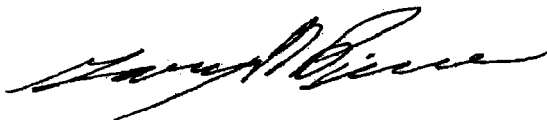
Questions

Any questions or requests for information should be directed to:

Gary Turner
Webasto Products North America
15083 North Road
Fenton Michigan
(810) 593-6220

Webasto regrets any inconvenience that this situation may cause. Webasto wants to assure you that Webasto is concerned about customer safety and your continued satisfaction with our products.

Best regards,



Gary R. Pierce
Vice President Operations and Product Services

Associate Administrator for Defect Investigations
National Highway Traffic and Safety Administration
United States Department of Transportation
400 Seventh Street, SW
Washington, D.C. 20590

Re: 49 CFR Part 573 Defect and Non-compliance Report –
Webasto model DBW 2010 coolant heater

Ladies and Gentlemen:

On February 9, 2005, Webasto Products North America ("Webasto") decided that a defect which relates to motor vehicle safety exists in items of motor vehicle equipment identified below and is furnishing notification to the National Highway Traffic Safety Administration in accordance with Part 573 of Title 49 of the Code of Federal Regulations on Defect and Non-compliance Reports.

Date this report was prepared: **February 15, 2005**

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.

Webasto Products North America, Inc.
15083 North Road
Fenton, Michigan 48430

The contact for purposes of this Notice is:

Gary R. Pierce, Vice President Operations & Product Services
15083 North Road
Fenton, Michigan 48430
Phone: (810) 593-6104
Fax: (810) 593-6105

Signed: _____
Gary R. Pierce, Vice President Operations & Product Services

I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall

Generic name of the item: **coolant heater**
Make: **Webasto**
Model: **DBW 2010**
Date of Manufacture: **November 2002 to February 2005**
Other Information : **The diesel fuel powered heaters are installed by third parties in trucks, buses motor coaches and marine applications. They can be used to heat engines or supply heat within the vehicle. This coolant heater incorporates the burner tube referenced below.**

Generic name of the item: **burner tube**
Make: **Webasto**
Model: **PN 303046/26533A**
Date of Manufacture: **November 2002 to February 2005**
Other Information: **The stainless steel wall of the burner tube in some cases is made out of a material that is not to specification and in those cases could fail prematurely. The burner tube is sold as a service part for the above referenced coolant heater.**

Identify manufacturers that purchase the components for use or installation in a new motor vehicle or a new item of motor vehicle equipment.

These products are sold to the manufacturers of new motor vehicles and motor vehicle equipment identified on the attached spreadsheet. OEMs are noted in the first column.

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.

100%

II. Identifying the Recall Population

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

**The estimated number of burner tubes that will be subject to this recall is 1,400.
The estimated number of heaters that will be subject to the recall is 10,700.***

*** Approximately 6000 of the heaters were sold to Vehicle Systems, Inc. unassembled.**

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

Less than 10%.

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:

Webasto received notification from two customers that heaters manufactured in late 2003 and early 2004 had experience accelerated deterioration of the wall of the burner tube. That condition occurred in walls that were 0.8 mm thick that were not within specification as to Nickel and Chromium content. Webasto has not received reports of this condition on burner tubes with a 1.0 mm wall thickness. Webasto has not documented out of specification steel on any 1.0 mm burner tubes. In November 2002, production of the burner tubes was relocated from Neubrandenburg, Germany to the Ukraine. The reported failures are on units manufactured about 1 year after production was transferred. Webasto has determined that failures in process controls occurred at the Ukraine production facility between November 2002 and the present. Webasto has determined that the substandard material was not available in Germany and that proper process controls were in place. Also, Webasto has not received reports of this condition in parts manufactured in Germany prior to November 2002.

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.

The walls of certain burner tubes, as previously described, are deteriorating at an accelerated rate and can fail. Lab test results indicate that the material composition of the stainless steel wall for these burner tubes was not within specification as to Chromium and Nickel.

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

Out of specification steel used in 0.8 mm tubes.

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

The failure of the burner tube could result in an increase in the temperature of the exhaust gas and a corresponding increase in the temperature of the exhaust system for the burner that could potentially ignite combustible materials in or around the vehicle.

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

An occupant may notice an increase in noise while the burners are operating. They may also observe heat related discoloration of components of exhaust system.

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

The burner tubes are supplied to Webasto Products North America by:

Webasto AG

**Kraillinger Str. 5
82131 Stockdorf
Germany
Ph: 011-49-89-85794-317**

A knowledgeable representative is Gary Pierce. (Contact information provided on page 1)

The burner tubes are fabricated by:

**Webasto Elektron GmbH
Schewtschenko-Str. 315
79069 Lwiw/ Ukraine
Ph: 011-38-322-911564**

A knowledgeable representative is Gary Pierce. (Contact information provided on page 1)

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.

On January 24, 2005, Webasto received reports from two customers about the failures of burner tubes. One of the customers supplies heating systems for campers and motor coaches. The other sells coolant heaters for marine applications. Webasto received three such burner tubes for examination on or about January 28, 2005. Three burner tubes (one failed, one used but not failed and one new) were then sent to an outside laboratory to evaluate the composition of the burner tube walls. The results were received on February 4, 2005. The results suggest that the stainless steel may not have been within specification for Chromium and Nickel. Bench testing was conducted on February 9 to measure the exhaust temperature of a burner without the containment wall. The measured temperature on the surface of the exhaust tube where it attaches to the heater was 750°C. Sales were temporarily halted by Webasto until it was confirmed that present stock was in specification. Webasto has received no reports of fires, injuries or fatalities associated with these failures.

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.

OEM dealers and authorized Webasto dealers will replace the subject burner tubes with new certified burner tubes at no cost to the owner.

Webasto will also reimburse owners for pre-notification remedies not covered under manufacturer warranties as more specifically outlined in the attached Reimbursement Plan. Based on the production dates for the suspect burner tubes, Webasto believes that any such remedies would have been covered under the 2 year warranty on this product.

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

Certified new tubes will not deteriorate as compared to out-of-specification tubes.

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.

Webasto has sorted all existing inventories to remove all suspect burner tubes. Webasto has also verbally instructed its principal dealers to sort all existing inventories. All new production and distribution is of certified.

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.

Webasto sells unassembled coolant heaters only to Vehicle Systems, Inc. Fully assembled heaters and service parts are sold to authorized independent dealers and distributors, to OEMs or their affiliated parts distributors or their dealers. The independent distributors sell to fleets and school districts. A small percentage is sold to individuals for motor vehicle applications. Also as indicated previously

Webasto has already verbally directed the sorting of existing inventories of burner tubes to stop distribution of suspect burner tubes. Webasto estimates that it will begin sending notifications to its customers, distributors and dealers within 10 days of this notice. The OEMs and VSI will then have to file Part 573 notices and notify their customers who are unknown to Webasto. Webasto will also have to acquire customer lists from its independent dealers and distributors to permit direct notification to those customers. Thus, Webasto cannot currently estimate when the notification process will be completed.

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.*

No written communications have been generated yet.

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

