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April 22, 2005

DEFECTS INVESTIGATION

Subject: New Safety Recall (SC0298, Sheppard M100 Steering Gear)

Attention:

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Submitted via Email to Patricia Wallace.

05V-178
(3 pages)

The following information is submitted in accordance with the requirements of 49 CFR Part 573.6 as it applies to a defect relating to motor vehicle safety.

573.6(c)(1)

Mack Trucks, Inc.
P. O. Box M
Allentown, PA 18105-5000

573.6(c)(2)

Mack CT and CXN, Heavy-Duty Class 8 vehicles manufactured with the Sheppard Model M100 Steering Gear from May 26, 2004, through April 6, 2005.

The start date above (May 26, 2004) represents the inception of the M100 Steering Gear on the Mack CT and CXN model vehicles. The end date (April 6, 2005) represents the date that Mack stopped delivering product to customers with the suspect steering gears.

Original Equipment Supplier Information:

R. H. Sheppard Co., Inc.
101 Philadelphia Street
P. O. Box 877
Hanover, Pennsylvania 17331-0877

573.6(c)(3)

Two thousand eight hundred and ninety four (2,894) vehicles are affected by the recall.

573.6(c)(4)

The percentage of the 2,894 vehicles expected to contain the defect is unknown.



573.6(c)(5)

There exists the potential that the steering gear mounting pads, which attach the steering gear to the frame rail, may fail prematurely. If this occurs, the result could be a sudden loss of steering and possibly result in a vehicle crash.

573.6 (c)(6)

Chronology of principle events that were the basis for the determination:

- | | |
|---------|--|
| 2/14/05 | Dealer contacts Mack Trucks regarding Steering Gear Mounting tab failure on CXN Model. 1 st occurrence. |
| 2/28/05 | Product Development opens investigation. |
| 4/8/05 | Dealer contacts Mack Trucks regarding Steering Gear Mounting tab failure on vehicle. 2 nd occurrence. |
| 4/12/05 | Stop Delivery issued for all CT and CXN model vehicles having the Sheppard M100 Steering Gear. |
| 4/12/05 | Regulatory Compliance Department contacted. Investigation opened. |
| 4/21/05 | Mack Trucks decided that the condition described in this notification constitutes a defect and that such defect is safety related. |
| 4/22/05 | NHTSA notified that Mack Trucks would initiate a voluntary safety recall. |

573.6(c)(7)

Not applicable

573.6(c)(8)

Mack Trucks, Inc. will initiate a voluntary owner notification, and recall all 2,894 vehicles.

The recall repair will consist of replacement of the suspect steering gears.

Reimbursement for cost incurred by the owner for "prenotification remedies" will be addressed on a case-by-case basis according to the "General Plan for Reimbursement of Pre-notification Remedies" which was published December 8th, 2004.

The number, which has been assigned to this recall by Mack Trucks, Inc., is **SC0298**.

A Safety Alert that will be distributed on or before April 25, 2005 will inform the dealers. The Owner letters will be mailed beginning on May 9th and completing by May 12th.



Advance copies of the Owner Notification will be submitted to NHTSA for review and approval prior to release to the owners.

If there are any questions regarding this information, please feel free to contact me.

Sincerely,

Timothy L. LaFon
Regulatory Compliance Administrator
Mack Trucks, Inc.
7900 National Service Rd.
P.O. Box 26115
Greensboro, NC 27409
timothy.lafon@volvo.com
(336) 393-2233

Additional Information:

Listed below is a summary of all the warranty claims, fleet reports, and customer complaints along with the dates of receipt as required by the regulation.

Complete VIN	Type	Receipt date
1M1AK06Y05N003616	Customer Complaint	2/14/2005
1M1AK06Y05N001560	Customer Complaint	4/8/2005