



RECEIVED  
448-215

OSV-192  
2095.

April 29, 2005

2005 MAY -2 P 12: 17

Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
400 7th Street, S.W. Suite 5319  
Washington, D.C. 20590

OFFICE OF  
DEFECTS INVESTIGATION

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations - Defect and Noncompliance Reports, Collins Bus Corporation is submitting information relating to a safety recall we are conducting. Specific information is as follows:

**573.6(c)(1)**

Collins Bus Corporation, a division of Collins Industries, Inc., is the manufacturer of the vehicles affected by this safety recall.

**573.6(c)(2)**

This recall affects Collins "Bantam", "Super Bantam", or "Grand Bantam" model school buses equipped with 24 inch wide bench-style passenger seats. The vehicles were manufactured between April 22, 2002 and April 27, 2005 at the South Hutchinson, Kansas assembly plant.

**573.6(c)(3)**

Collins Bus Corporation built 101 (one hundred-one) vehicles with the noncompliance before the problem was recognized and corrected. The majority of the vehicles are in the possession of end users. Some vehicles are in the possession of Collins Bus distributors awaiting delivery to end users.

The number of seats installed in each vehicle varies from 1 to 5. The total number of seats installed in the 101 vehicles is 184 (one hundred eighty-four).

**573.6(c)(4)**

An estimated 100% of the recall population contains the noncompliance.

**573.6(c)(5)**

The vehicles in question are equipped with bench-style single passenger seats having a lower cushion seating surface measuring 24 inches in width. These seats should have a seating surface of only 22 inches wide to have a single designated seating position according to NHTSA's interpretation of 49CFR571.222.

**573.6(c)(6)**

On April 27, 2005, Brian Smith of NHTSA called Collins Bus Corporation to report his analysis of the 24 inch wide seat in a Collins school bus being audited by NHTSA. Mr. Smith referenced various NHTSA interpretation letters which stated the number of designated seating positions in a school bus should be defined by 49CFR571.222 "School Bus Passenger Seating and Crash Protection" instead of 49CFR571.3 "Definitions". Mr. Smith stated the 24 inch wide seat did not conform to the 49CFR571.222 definition of a seat having a single designated seating position. Collins Bus Corporation decided to recall other vehicles equipped with 24 inch wide seats to address this nonconformance.

**573.6(c)(7)**

The determination of the noncompliance was based on input from Brian Smith of NHTSA, various interpretation letters, and a mathematical calculation referenced by 49CFR571.222 for determining the number of designated seating positions on a school bus bench-type seat. According to this mathematical calculation, the 24 inch wide seating surfaces would have two designated seating positions instead of one.

**573.6(c)(8)**

The remedy of the nonconformance will include replacement of the 24 inch wide seat cushion with a new cushion measuring 22 inches wide at the seating surface. Once the new cushion is installed, the seat will conform to the dimensions of a seat with one designated seating position according to NHTSA's interpretation of 49CFR571.222. The replacement of the seat cushion is a simple procedure and may be easily performed by the vehicle owner.

All vehicle owners will be notified the week of May 2, 2005. Notification will consist of a description of the nonconformance, a brief description of the repair procedure, instruction on how to obtain repair parts (in this case, replacement seat cushions), and instructions on how to repair the vehicle.

An Owner Response Postcard will be provided to the owner to confirm if the repair is completed or not required. The proposed Owner Notification letter and Owner Response Postcard samples are attached.

**573.6(c)(9)**

Attached is a copy of the proposed Owner Notification letter which Collins Bus Corporation will send to the vehicle owners. A copy of this letter will also be sent to Collins Bus distributors so they will be informed of the situation.

**573.6(c)(10)**

Attached is a copy of the proposed Owner Notification letter and Owner Response Postcard which Collins Bus Corporation will send to the vehicle owners.

**573.6(c)(11)**

Collins Bus Corporation will use the campaign identification number assigned by NHTSA when determined.

Should you need further information, my contact information is as follows:

Phone: 620-662-9000 or 800-533-1850 X479  
Fax: 620-662-3838  
E-mail: bryce.pfister@collinsbus.com  
Mailing Address: Collins Bus Corporation  
P.O. Box 2946  
Hutchinson, KS 67504-2946

Sincerely,  
**COLLINS BUS CORPORATION**

Bryce Pfister, P.E.  
Director of Operations