

GILLIG CORPORATION

June 2, 2005

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

Mr. Kenneth Weinstein
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

05V-271
(8pages)

Dear Mr. Weinstein

In accordance with the procedures outlined in 40CFR 573.6, Gillig is submitting the attached Safety Defect Information Report. Gillig decided there was a defect in the Tenneco torque rod clamps on March 3, 2005 and the population of suspect torque rod clamps was established on May 25, 2005.

Gillig will conduct the recall, but the parts will be sent to the customers directly from Tenneco and the removed parts will be returned directly to Tenneco. The customer letter is ready for NHTSA's review as soon as we receive a recall number.

Sincerely,

THE GILLIG CORPORATION



Robert L. Birdwell
Executive Director, Quality & Service

RLB:rlb
Enclosures (1)

CC: C. Koske

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DEFECTS INVESTIGATION

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report¹

On May 25, 2005 the Gillig Corporation decided that a defect which relates to motor vehicle safety) exists 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: June 2, 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 25800 Clawiter Road Hayward, California 94545

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

Robert L. Birdwell Executive Director, Quality & Service

Telephone Number: 510-264-5075 Fax No.: 510-785-1348

Name and Title of Person who prepared this report.

Robert L. Birdwell
Executive Director, Quality & Service

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:** 2004-5 **Model(s):** Low Floor

Production Dates: Beginning: January 1, 2004 **Ending:** April 11, 2005

VIN Range: Not significant due to fleet Vin number assignments

Vehicle Type: Bus **Bodystyle:** 29, 35 and 40 foot low floor buses

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

Buses equipped with Tenneco torque rods with cast iron adjusters

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%

II. Identify the Recall Population

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

Model	Year	Number of Vehicles Potentially Involved
29 foot low floor	2004	146
35 foot low floor	2004	213
40 foot low floor	2004	464
29 foot low floor	2005	25
35 foot low floor	2005	74
40 foot low floor	2005	174

Total Number Potentially Affected by the Recall..... 1096

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

Less than 5%

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:

All the low floor buses built during the time frame identified by Tenneco as having suspect castings.

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 cast clamp portion of the torque rod could crack under initial torquing of the clamp fasteners resulting in breakage or cracks.

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

Casting porosity and incorrect heat treatment caused potential weakness in the cast clamp portion of the torque rod.

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

Potentially could result in loss of vehicle control.

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

Only has happened on initial installation and could be visible and audible to the mechanic.

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

N/A

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

N/A

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 March 3, 2005 Gillig broke a torque rod clamp in assembly of a bus. The part was returned to Tenneco for analysis. The analysis resulted in an investigation of various casting lots to determine which were defective. The

investigation found two separate potential defects. The castings were on some occasion incorrectly heat treated and on other occasions had casting porosity beyond Tenneco's standards.

On April 11, 2005 Tenneco supplied Gillig with fabricated steel torque rod clamps while Tenneco's investigation was still under way.

On May 25th Gillig and Tenneco decided to recall all the cast torque rod clamps.

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.

Gillig and Tenneco will replace the suspect torque rod assemblies.

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

Replacing cast iron torque rod clamps with fabricated steel clamps. See attached removal and installation procedure for photos of the parts.

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.

Fabricated steel parts were implemented in production on April 11, 2005.

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 will send submit customer letter for NHTSA's approval within one week of NHTSA's assignment of a recall number to the above action. Gillig will notify customers within one week of NHTSA's approval of the customer letter. Replacement parts will be sent directly to the effected customers.

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.

See attached.

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

Gillig Low Floor Bus Front Axle Rod Removal and Installation Procedures

It has been discovered that a small percentage of torque rod cast clamps have been cast improperly, which could result in the breakage of clamps when initially torqued. As a precaution, all torque rods with cast clamps installed on vehicles since January 2004 are being replaced with a torque rods using a clamp of a different design. The following will provide instructions on how to identify the recalled torque rods. Also outlined is the procedure for the replacement of recalled rods.

INSPECTION PROCEDURE

Once a bus is identified the following procedure should be used to identify which, if any, of the rods need replacement.

- A list of buses by VIN that potentially have suspect clamps accompanies this notice. Only buses that match these VIN numbers will have to be inspected.
- All rods with suspect clamps will be located on the front suspension only. No rear rods are involved.
- Suspect clamps can only be identified by using the markings on the cast clamp located in the center of the rod.
- Identification should be performed while the rod is still installed on the vehicle.
- Castings are identified by a raised part number 477760 cast in them on one side and a cavity number and lot number beginning with a letter followed by 3 numbers (X ___) on the other. See Figure 1.
- Some vehicles may not have any rods on them that meet the recall requirements. Others could have just one, or up to all 4 rods, that meet the requirements for replacement.

After the bus is put on a lift where the rods can be easily accessed and inspected, the suspect clamps can be identified as noted in the attached photo (Figure 1).

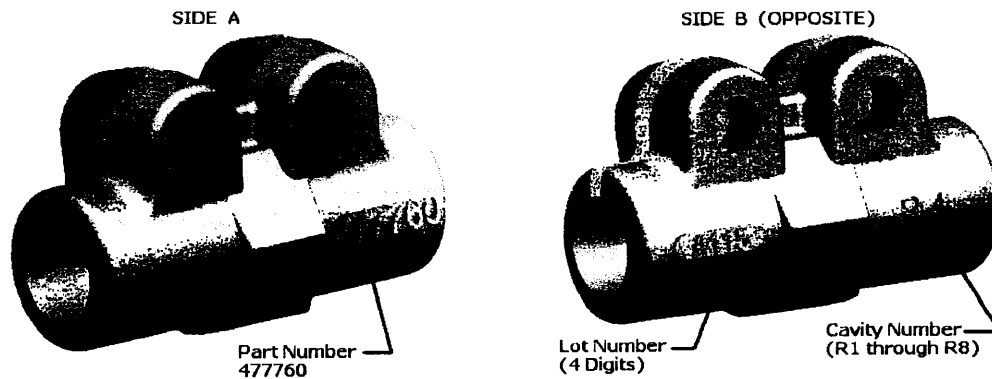


Figure 1: Clamp Identification Aid

Not included in the recall are rods with clamps having the part number 477762 cast in them. These clamps can also be identified with a cavity number ending in the letter S and a 4 digit numerical lot number. Unlike the recalled clamps, these clamps will have all of the identification marking cast into the part on the same side. See Figure 2

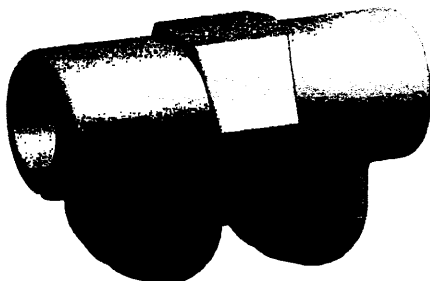


Figure 2: Identification Aid for Clamps Not Included in the Recall

REMOVAL AND REPLACEMENT PROCEDURE

In order to maintain the existing alignment, the replacement rod should be adjusted to the same length as the rod removed. The replacement rod should be reinstalled in the same orientation as the original.

-If more than one rod requires replacement on a bus, remove and replace each rod one at a time.

Length Adjustment

- Replacement rods will need to be adjusted to the same length as the rod it is replacing.
- Replacement rods clamps are tightened to a low torque for shipping. Loosen clamps before adjusting.
- Adjust the replacement rod by turning the clamp spacer, **not the rod ends**, until it is equal in length to the removed rod (See figure 3).

Installation

- Install the replacement rod in the same location as the rod it is replacing.
 - Bolts used to mount the rod to the vehicle should be tightened 180 foot pounds.
 - New rods will be provided with labels that read "INSTALL REARWARD, THIS SIDE DOWN" & "INSTALL FORWARD THIS SIDE DOWN" to ensure they are reinstalled in the proper orientation.
 - After the rods have been installed on the vehicle, tighten the bolts through the rod clamps to 140 foot pounds.
- If necessary, replace any remaining rods rod(s) on the vehicle that meet the recall requirements in the same manner as above.

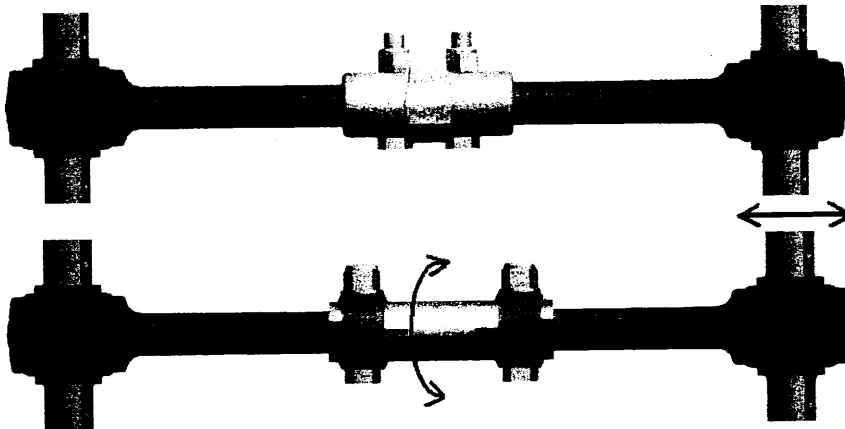


Figure 3: Procedure to adjust new rod to length of removed rod.

Note the new rod utilizes a clamp design with a machined center spacer with individual clamps on each end. Adjust the replacement rod to the same length as the removed rod by rotating the center spacer, not the rod ends. This procedure will assure that the bus alignment is maintained.

A guideline for estimated time to inspect each involved bus and replace suspect rods when needed has been set. On average, it should take about ½ hour to bring each bus in for inspection and identify any rods that need to be replaced. In addition, it should take about 1 hour to remove, adjust and replace each suspect rod following the instructions above, which includes ¼ hour for adjusting the rod.

Replaced rods are to be returned using the supplied red tags to Tenneco Automotive, 503 Weatherhead Street, Angola, IN 46703.

If you have any questions regarding the identification or replacement procedure, please call Gillig Field Service for assistance at: (510) 264-5077.