



AUG 10 2005

05V-351

(2 pages)

August 1, 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-__ Pedestal Seat Mounting

Dear Mr. Person:

Pierce has decided that a defect exists in the mounting of certain pedestal seats used on certain Pierce custom chassis with Command Cabs. The pedestal seats were also used in rescue bodies on certain custom and commercial 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: 1999 - 2004
Models: Dash, Lance, Enforcer, Quantum & Saber
Production Date Beginning: 06-01-99
Production Date Ending: 08-27-04

3. Number of Potentially Affected Vehicles: 90

4. Estimated Percentage of Vehicles Containing the Defect or Noncompliance: 80%

5. Description of the defect or non-compliance:

Certain pedestal type seats used in Command Cab and rescue body offerings do not meet the pull test requirements of FMVSS 207. In some cases the pedestal seat was mounted by drilling and tapping the cab or body floor. In the event of a vehicle accident, the pedestal seat drilled and tapped fasteners could fail to restrain the seat.

6. Chronology of Principal Events:

08-01-04 Quality alert issued. Bolt & nut pedestal seat fasteners required.

08-10-04 FMVSS 207 pull testing initiated.

04-21-05 FMVSS 207 pull testing completed.

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

R&D Test Report RD1062.

8. Corrective Action:

If the pedestal seat was mounted with tapped fasteners, remove the fasteners. Drill a through hole and replace the mounting fasteners with 7/16" bolts and nuts.

9. Representative Notices:

Will be sent when complete.

Sincerely,
Pierce Manufacturing, Inc



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