



August 12, 2005

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

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2005 AUG 15 A 11:17

DEFECTS INVESTIGATION

05V-357 (2pgs.)

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) Vehicles affected are manufactured by:

Collins Bus Corporation, a division of Collins Industries, Inc.
P.O. Box 2946
Hutchinson, Kansas 67504-2946

573.6(c)(2) The following vehicle models are being recalled:

Collins Bus Corporation Bantam and Super Bantam school buses with a GVWR less than 10,001 pounds, built between July 2004 and November 2004.

573.6(c)(3) The total number of vehicles potentially containing the defect is:

Two hundred and one (201). The majority of the buses are in the possession of end users. Some buses are in the possession of Collins Bus distributors awaiting delivery to end-users.

573.6(c)(4) The approximate percentage of the total number of vehicles to contain the defect is:

Due to the nature of the defect, and exact conditions required to cause the defect, the percentage of total vehicles to actually contain the defect can not be known unless the ceiling panels are destructively disassembled. Due to this, all buses within the potential of the recall will be reworked.

573.6(c)(5) Description of the defect:

MGA Research Corporation did FMVSS 221 joint strength testing on two roof seams out of a Chevy Super Bantam bus. One of these seams passed, and one did not pass the 221 test load requirements. It was found that the amount of adhesive applied was inadequate for the type of adhesive used. Therefore, joint separation at a load less than that prescribed in FMVSS 221 is possible in the event of an accident. The type/brand of adhesive used was Lord 410 Methacrylate, purchased from the Lord Corporation. Collins Bus Corporation has had no reports of this potential defect causing any problem with the vehicles in the field.

The use of the Lord adhesive in the ceiling skins was discontinued in October of 2004. It was replaced with a structural adhesive from the Loctite Corporation. Test results from production QC tests indicate compliant bonds are being made with the Loctite adhesive and the ceiling skins. Production QC test data indicates that prior to July 2004, the quantity and type of adhesive used produced joints that were in compliance with FMVSS 221.

573.6(c)(6) The following is a summary of all the events that were the basis for determining the defect.

In July of 2005 NHTSA notified Collins Bus Corp. of the joint failure found by MGA. MGA had been hired by NHTSA to perform FMVSS 221 joint strength testing on the subject school bus.

Collins Bus Corporation determined that a safety recall was necessary to insure that school buses in the field built during the suspect time period are modified such that the joints will be in compliance with FMVSS 221.

573.6(c)(7) Test results or data:

From MGA's FMVSS 221 Test data, Reference Test #C40901 with sample #C1SHRMI182BBH, the required minimum test load was 4961 LBF. The actual test load achieved before joint failure was 3108 LBF.

573.6(c)(8)(i) The defect will be corrected as follows:

The defect will be corrected by adding two additional screws between the current screws that attach the seams of the ceiling skins to the structural roof bows. The present screws are on 3.75" centers; adding the two additional screws will result in fasteners at 1.25" centers.

Customers will be instructed to contact Collins Bus Corporation, warranty department to obtain parts instructions and reimbursement for the defect. Collins Bus Corporation will monitor the recall and file the quarterly status reports.

573.6(c)(8)(ii) Correspondence to notify Collins Bus Corporation distributors and Customers of the safety recall:

Mailing of Customer and Distributor notification letters are scheduled to be sent out during the week of August 29, 2005. Parts are anticipated to be available at the time of the mailing.

573.6(c)(10)

Attached is a copy of the proposed Owner Notification letter and Owner Response Postcard that 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.

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

Phone: 620-662-9000 or 800-533-1850 X430
Fax: 620-662-8484
E-mail: steve.gladow@collinsbus.com
Mailing Address: Collins Bus Corporation
P.O. Box 2946
Hutchinson, KS 67504-2946

Sincerely,
COLLINS BUS CORPORATION



Steve Gladow
Engineering Manager



August 15, 2005

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

On 12AUG05, Collins Bus Corporation submitted a 573 report regarding FMVSS 221 compliance. This letter is to amend the noted report.

In the report it was stated that an Owners Notification Letter and Owners Response card was attached. These items were not attached on included in the FAX sent. These items will be supplied as they become available.

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

Phone: 620-662-9000 or 800-533-1850 X430
Fax: 620-662-8484
E-mail: steve.gladow@collinsbus.com
Mailing Address: Collins Bus Corporation
P.O. Box 2946
Hutchinson, KS 67504-2946

Sincerely,
COLLINS BUS CORPORATION

A handwritten signature in cursive script that reads "Steve Gladow".

Steve Gladow
Engineering Manager

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OFFICE OF
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