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September 19, 2005

**VIA FACSIMILE AND  
CERTIFIED U.S. MAIL,  
RETURN RECEIPT REQUESTED**

05V-416  
(3 pages)

Mr. George H. Person  
National Highway Traffic Safety Administration  
Office of Defects Investigation  
400 7<sup>th</sup> Street, S.W. NSA-11  
Washington, DC 20590

**Re: EIDorado National (California), Inc.  
Defect and Non-Compliance Report**

Dear Mr. Person:

Our firm is general counsel for EIDorado National (California), Inc. ("EIDorado"), 9670 Galena Street, Riverside, California 92509. EIDorado National received notification from Cummins Inc. ("Cummins") that there is a potential safety-related defect with respect to a the ECM calibration that controls the fuel lift pump on certain Cummins ISB-02 diesel engines. Cummins has already instituted a safety recall campaign in connection with this matter. The recall number assigned by NHTSA for Cummins' safety recall campaign is 05E-054.

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, we are hereby notifying the National Highway Traffic Safety Administration that certain buses manufactured by EIDorado contain the Cummins ISB-02 diesel engines that have been determined by Cummins to have a defect that relates to motor vehicle safety.

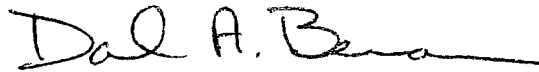
As more specifically set forth below, Cummins has agreed to conduct the recall campaign involving the ISB-02 diesel engines with the improperly calibrated fuel lift pumps, including but not limited to providing notification to all of EIDorado's potential customers that are subject to the recall campaign, providing the necessary parts to repair the defect, and filing the quarterly reports in connection with the recall campaign.

- A. Recall Population and Vehicle Identification. The ISB-02 diesel engines supplied by Cummins with the improperly calibrated fuel lift pumps have been used on certain 2004 through 2006 model year Escort RE-A, Escort RE, EZ-Rider II, XHF, Transmark, and Axxess buses manufactured by ElDorado during the period from January 2004 through April 2005. The total number of buses subject to this recall campaign is 98.
- B. Description of Defect. All of the buses subject to this recall campaign contain the ISB-02 diesel engines manufactured by Cummins that contain the improperly calibrated fuel lift pumps. The subject ECM calibration controls the fuel lift pump operation. The defect results in erratic voltage supply to the fuel lift pump which causes premature electrical brush wear internal to the fuel lift pump. This premature wear could result in fuel lift pump failure and in some cases may cause an engine stall condition. There is no defect in the fuel lift pump itself.
- C. Basis for Determining that a Defect Exists. ElDorado received notification from Cummins on August 31, 2005 that a potential defect with the ISB-02 diesel engines may exist.
- D. Remedying of Defect. As set forth in the notifications to be issued by Cummins in connection with recall campaign 05E-054, the remedy will include the ECM calibration and replacement of the fuel lift pump. The owners of the buses subject to this recall campaign will be advised to contact Cummins in order to make arrangements to have the remedy completed by Cummins. Cummins has agreed to perform the ECM calibration and replace the fuel lift pumps without charge to the owners.
- In order for Cummins to remedy the defect referred to above, all of the owners of the buses sold by ElDorado that are subject to this recall campaign must be notified. As of this date, ElDorado has completed its obligation to provide Cummins with the names and addresses of the current owners of such buses. Cummins will implement the recall campaign in accordance with the procedures specified in recall campaign 05E-054.
- E. Owner Notifications. Cummins has agreed to provide the notification letters to the owners of the buses that are subject to this recall campaign in accordance with the procedures specified in recall campaign 05E-054.
- F. Quarterly Reporting Requirements. Cummins will be responsible for filing quarterly reports in connection with recall campaign 05E-054. Because the information included by Cummins in its quarterly reports will encompass the remedying of the ElDorado buses subject to this recall campaign, ElDorado will not file quarterly reports to avoid duplication.
- G. Campaign Number. ElDorado does not have an internal campaign number for this recall. ElDorado will use the recall campaign number assigned by NHTSA.

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The enclosed information should comply with the NHTSA regulations and satisfy the obligations of EIDorado with respect to this recall campaign. If you need any additional information regarding the participation of EIDorado in this recall campaign, please feel free to contact me at (937) 492-1271.

Very truly yours,

A handwritten signature in black ink that reads "Daniel A. Bensman". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Daniel A. Bensman

dja

cc: EIDorado National (California), Inc. (via fax)  
Mr. John M. Garmhausen

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