



CORPORATION

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OFFICE OF DEFECTS INVESTIGATION
NATIONAL HIGHWAY TRANSPORTATION
SAFETY ADMINISTRATION

October 24, 2006

Mrs. Kelly Schuler
Office of Defects Investigation
National Highway Transportation
Safety Administration
400 Seventh Street S.W.
Washington, DC 20590

Dear Mrs. Schuler:

U.S. Bus Corporation has determined that a noncompliance with a certain Federal Motor Vehicle Safety Standard exists; our Part 573 notification form is attached.

Specifically, we were notified about the potential noncompliance by John Finneran of NHTSA on Monday, October 23, 2006. Mr. Finneran was advised by MGA Research that a decal required in 571.111, Paragraph 9.3(c) which explains viewing through the mirrors, was not visible directly from the driver's seated position with the interior rearview mirror adjusted. Mr. Finneran e-mailed the test photos for my review and, while I agree with his findings, it is my determination that this is an **Inconsequential Noncompliance**, and does not affect the safety or performance of the vehicle. I will be mailing a petition for this review soon.

Potentially, this recall, if it occurs, would involve 4,119 school buses, or virtually every school bus manufactured by U.S. Bus Corporation since its beginning in 1998. The remedy for this noncompliance would be to mail each end-user a new label and a photo depicting its proper placement.

The sample customer notification letter to be used will follow by mail.

Sincerely,

Michael A. Sykes, Director
Product Development

WE'RE SERIOUS ABOUT SMALL BUSES.

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

On OCTOBER 23, ²⁰⁰⁶~~199~~, U.S. BUS CORP. [MFR] decided that (~~a defect which relates to motor vehicle safety~~)(a noncompliance with Federal Motor Vehicle Safety Standard No. 111) 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: OCTOBER 24, 2006

Furnish the manufacturer's identification code for this recall (if applicable): _____

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.

U.S. BUS CORPORATION
3 PAT. MALONE DRIVE
SUFFERN, NY 10901

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

MICHAEL A. SYKES, DIRECTOR OF PRODUCT DEVELOPMENT

Telephone Number: (765) 939-3984 Fax No.: (765) 939-4375

Name and Title of Person who prepared this report.

MICHAEL A. SYKES
DIRECTOR OF PRODUCT DEVELOPMENT

Signed: 

¹Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

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): U.S. BUS Model Years Involved: ¹⁹⁹⁸⁻2006 Model(s): UNIVERSE, STURDIBUS,
Production Dates: Beginning: ~~1998~~ Ending: ~~10/23/06~~
VIN Range: Beginning: _____ Ending: _____
Vehicle Type: ~~Bus~~ Bodystyle: _____

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

Make(s): U.S. BUS Model Years Involved: ¹⁹⁹⁸⁻2006 Model(s): UNIVERSE, STURDIBUS
Production Dates: Beginning: 1998 Ending: 10/23/06
VIN Range: Beginning: _____ Ending: _____
Vehicle Type: SCHOOL BUS Bodystyle: _____

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

VEHICLES NOT INCLUDED IN THE RECALL DO NOT HAVE
CROSSVIEW MIRRORS

Make(s): _____ Model Years Involved: _____ Model(s): _____
Production Dates: Beginning: _____ Ending: _____
VIN Range: Beginning: _____ Ending: _____
Vehicle Type: _____ Bodystyle: _____

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

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
	1998	72	72
	1999	348	348
	2000	488	488
	2001	429	429
	2002	494	494
	2003	485	485
	2004	600	600
	2005	545	545
	2006	558	558
Total Number Potentially Affected by the Recall:			<u>4019</u>

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100%

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:

POTENTIALLY, ALL VEHICLES MANUFACTURED BY U.S. BUS CORPORATION ARE INVOLVED
IN THIS RECALL

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.

571.211 § 9.3 (c) LABEL INSTALLED ON FRONT HEADER

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

ABOVE STANDARD REQUIRES A LABEL EXPLAINING MIRROR USE BE INSTALLED "VISIBLE TO THE SEATED DRIVER". U.S. BUS CORPORATION INADVERTENTLY INSTALLED REARVIEW MIRROR IN A POSITION WHICH, DEPENDING ON DRIVER SIZE AND MIRROR ADJUSTMENT, COULD BLOCK THE DRIVER'S VIEW OF THIS LABEL.

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

UNTRAINED DRIVER COULD POSSIBLY RELY ON CROSSVIEW MIRRORS TO VIEW AREAS TO THE SIDES AND REAR OF BUS.

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

NONE - NOT APPLICABLE

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

NOT APPLICABLE

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

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. N/A

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

NONCOMPLIANCE WAS DETERMINED ON OCTOBER 23, 2006. AFTER A PHONE CALL
FROM NHTSA AND E-MAILED PHOTOS TAKEN OF VEHICLE BEING TESTED AT
MGA RESEARCH

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.

REMEDY WOULD CONSIST OF MAILING A NEW LABEL TO CUSTOMERS, ALONG WITH
A PHOTO SHOWING CORRECT PLACEMENT OF LABEL

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

THE SUBJECT LABEL IS THE SAME IN BOTH CASES, ONLY DIFFERENT LOCATIONS.

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.

UPON NOTIFICATION OF THE PROBLEM BY NHTSA, U.S. BUS IMMEDIATELY BEGAN PLACING
THE DECAL IN AN UNOBSTRUCTED LOCATION ON THE DASH. THIS WILL BE THE
SAME AS THE REMEDY.

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.

UPON RECEIPT OF A MAILING LIST, U.S. BUS WILL IMMEDIATELY BEGIN
NOTIFYING CUSTOMERS. A START DATE WILL BE PROVIDED TO NHTSA WHEN
IT IS DETERMINED.

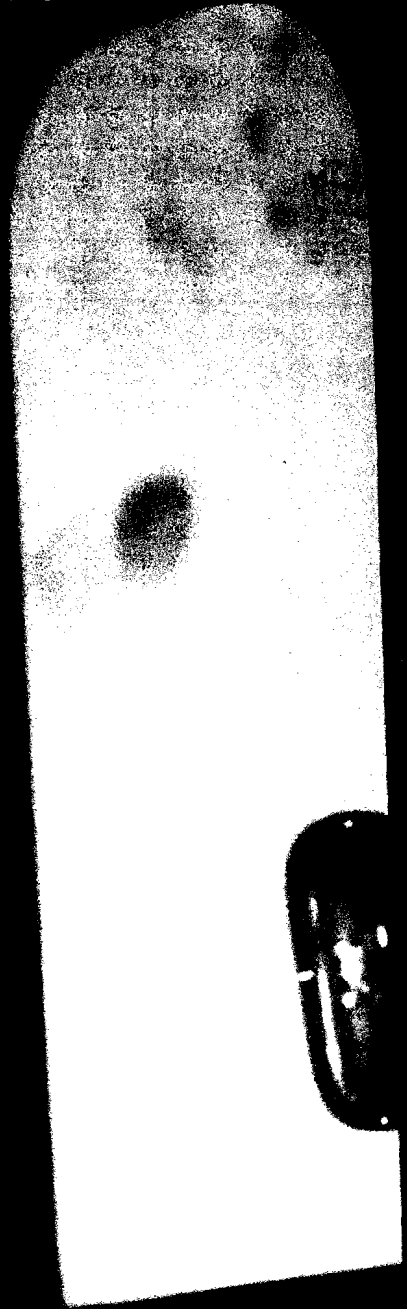
VII. Furnish Recall Communications

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.

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.

PHOTO OF TEST BOY
AS BUILT



ALARM MUST SOUND!
IN THE EVENT OF A FIRE
OR OTHER EMERGENCY
PULL DOWN THE ALARM
HANDLE

PHOTO #2 OF TEST BUS
AS BUILT



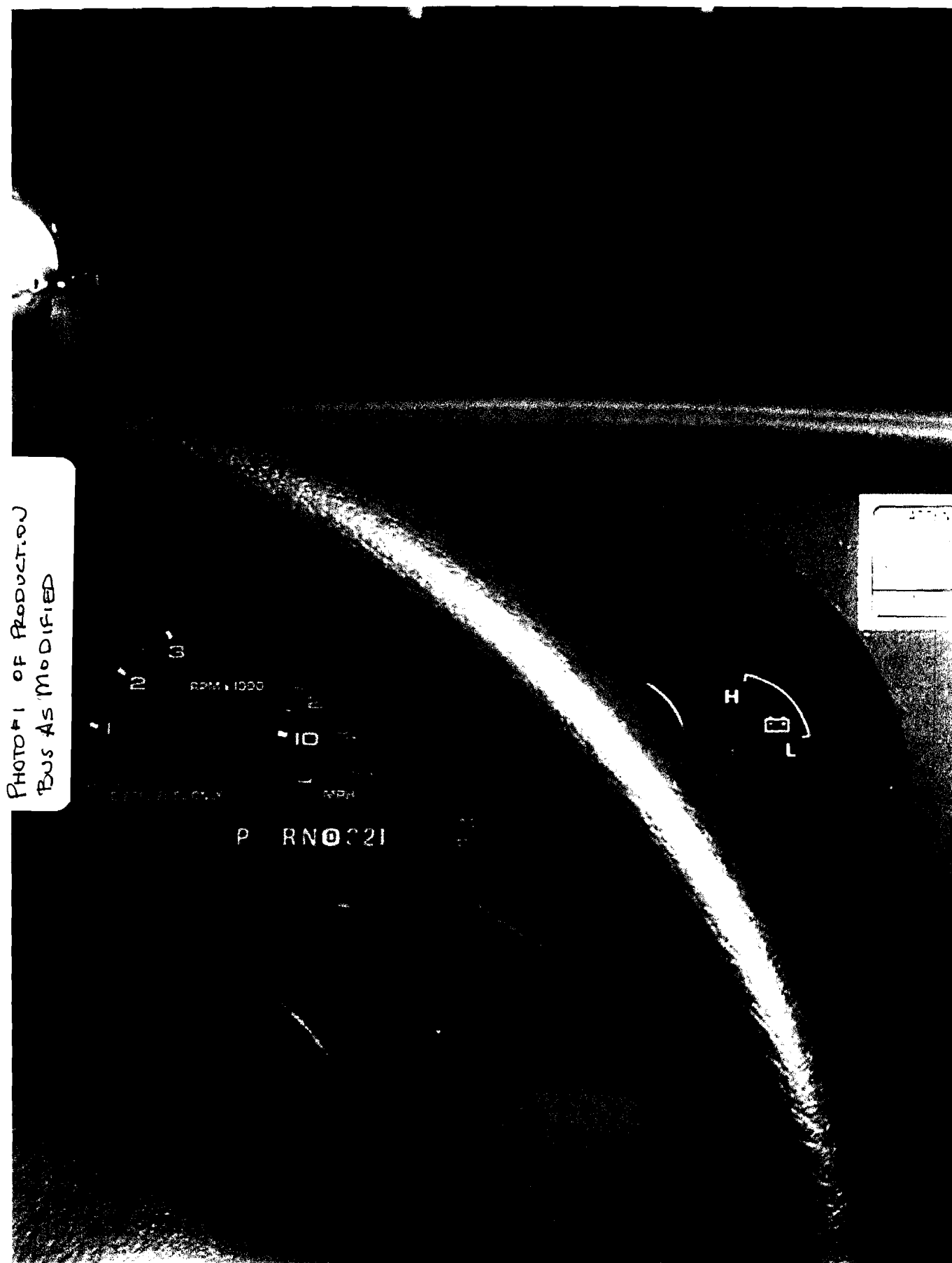


PHOTO #2 OF PRODUCTION
BOX AS MODIFIED

ATTENT.

DEPT. OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535
TELEPHONE (202) 452-2000
FAX (202) 452-2001

10/24/2006

