GILLIG

GILLIG CORPORATION

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

November 1, 2006

06V-427
(13 pages)

George Person
Head-Recall Management Division
US DOT-National Highway Traffic Safety Administration
Office of Defects Investigation (NBS-215)
400 7th Street SW
Washington D.C. 20590

Re: Safety Recall – Cummins ISL & ISC High Pressure Fuel Lines

Dear Mr. Person:

This letter is written to inform you of Gillig Corporation's intention to notify customers of an alleged safety defect related to Cummins ISL & ISC engines installed in Gillig Corporation transit buses between August 2003 and March 2006.

The Cummins ISL & ISC engines equipped with the CM850 fuel system have a high pressure fuel line which carries fuel from the high pressure pump to the engine fuel rail at a nominal pressure of 18,000 to 22,000 psi.

Failure of the line can introduce high pressure atomized fuel into the engine compartment which can ignite when it comes in contact with a hot surface (i.e. exhaust or turbo-charger).

Post failure examination of the lines by Cummins has apparently determined that they failed due to excessive vibration. Cummins has since developed a bracket for installation to alleviate the stress on this line and they are currently conducting Cummins Campaign C0610 to address this issue. The correction campaign involves the replacement of the existing fuel line, addition of a new bracket and the marking of code 0610 on the engine data plate.

The window for the recall encompasses all Cummins ISL & ISC engines supplied to Gillig Corporation prior to the receipt of engines with the fuel line bracket already installed.

Gillig Corporation will contact the customers who purchased these buses with instructions to contact their local Cummins dealer to arrange to have the campaign completed as soon as possible.

At this time Gillig Corporation is in disagreement with Cummins over whether or not this is a safety recall. Gillig Corporation is, therefore, filing the appropriate 573 report (see attached). If you have any further questions please contact me.

Sincerely,

GILLIG CORPORATION

Charles E. Koske
Senior Vice President, Engineering

Form Approved: O.M.B. No. 2127-0004

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report[1]

On October 31, 2006 , Gillig Corporation **decided that a defect which relates to motor vehicle safety) exits 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: November 1, 2006

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 Hayward, California

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

Charles E. Koske Sr. Vice President

Telephone Number: 510-264-5031 **Fax No.:** 510-264-3897

Name and Title of Person who prepared this report.

Charles E. Koske

Sr. Vice President

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**: 2003-2006 **Model(s)**: Low Floor

Production Dates: **Beginning**: August 03 **Ending**: May 05

VIN Range: **Beginning**: Not significant – engine serial number identifies recall population

Vehicle Type: Bus **Body style**: 29, 35 and 40 foot Low Floor

Make(s): Gillig Corp **Model Years Involved**: 2003-2006 **Model(s)**: Phantom

Production Dates: **Beginning**: August 03 **Ending**: May 05

VIN Range: **Beginning**: Not significant-engine serial number identifies recall population

Vehicle Type: Bus **Body style**: 30, 35 and 40 foot high Floor Phantoms

Note-Spare engines are also in the population –they are loose extra engines not installed in vehicles sold to customers as part of the purchase of the bus fleet.

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall: Vehicles to be recalled have Cummins ISL engines with serial numbers in the population identified by the attached Cummins information.

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.

60%

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
Low Floor	2003-2006	1619
Phantom	2003-2006	249
Spares and uninstalled	2003-2006	93

Total Number Potentially Affected by the Recall: 1961

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:

Cummins ISL and ISC engines equipped with the CM850 fuel system as identified by serial number by Cummins Corporation.

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.**

High pressure metal fuel line on Cummins ISL and ISC engines in the designated population have a breakage issue

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

The high pressure fuel line fails due to engine vibration.

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

High pressure fuel leaks are a potential fire hazard in the engine compartment.

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

Fuel leaking in the engine compartment can leave a visible film that can be discovered during routine maintenance and inspections such as checking engine oil level. Fuel leaks can have a very noticeable and distinctive odor and can lead to fuel puddling under the bus.

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

Cummins Inc.
500 Jackson Street
Columbus, Indiana 47201

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

Steve Butler – Director of Engine Certification

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.

NHTSA made Gillig aware of incidents in other makes of buses with engines in the identified population in October, 2006. Gillig's investigation showed we had purchased 1961 of the subject engines for installation in various model buses-the Cummins campaign had been done on 702 Gillig's to date. High pressure fuel leaks are a potential fire hazard that needs to be remedied.

Gillig is not aware of any reports, accidents, fires, injuries, or fatalities in Gillig buses due to this issue. Gillig is not aware of any warranty claims as warranty is done between the end use customer and Cummins.

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.

N/A

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.

Cummins developed a bracket to dampen vibration, reduce fuel line stress and prevent failure of a metal fuel line. See attached Cummins Campaign C0610 dated April 14, 2006

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

Remedied engines have fuel line support bracket installed as depicted on the attached Cummins Campaign C0610. The campaign also replaces the fuel line between the injection pump and the high pressure common rail – the new fuel line would not be distinguishable.
The engine data plate is also to be stamped with the campaign number.

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.

Cummins personnel updated Gillig's on hand inventory of engines in May, 2006 - production change was the same as the field 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.

Gillig will initiate mailing of the recall on receipt of the recall number from NHTSA and after review of the notification package per item 9 below. Gillig customers will be directed to contact their Cummins Distributor to have Campaign C0610 completed on their buses as soon as possible.

To date Gillig is aware that 702 buses in the population have already been remedied by the Cummins campaign.

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

CUMMINS FIELD CAMPAIGN

Please Deliver TO: Service Managers and Warranty Decision Makers

FROM: Cummins Customer Assurance Communications

Subject: ISC/ISL CM850 Fuel Line Bracket

Number: C0610 **Date:** 14-Apr-2006

Expires: 28-Feb-2008 (U.S./Canada)
31-Dec-9999 (International)

Attention: U.S./Canada Distributors/Branch and Division/Regional Offices
U.S./Canada Warranty Dealers

If additional information is required, contact your Cummins Warranty Operations Group Leader.

DESCRIPTION: This campaign is being released to address a fuel line breakage issue on ISC/ISL transit bus engines.This campaign authorizes the field to install a fuel line bracket on ISC/L CM850 engines in transit bus applications (see attached ESN list). The bracket was designed to reduce fuel line stress.

ACTION:

In order to qualify for repair under this Campaign, an engine:
1. **must** be within new engine warranty or CAP coverage, AND
2. **must** be an ISC with CM850 or ISL with CM850 engine installed in a transit bus application, AND
3. **must** be indentified in the ESN listing found in Attachment A, AND
4. data plate **must not** be stamped 0610.

After verifying the engine meets the qualifying criteria, use the following instructions to upfit the engine with bracket, Part Number 4937500. A new fuel line **must** be installed when installing the bracket.
1. Remove the high pressure fuel line between the injection pump and high pressure common rail.
2. Install a new fuel line and the bracket included with kit, Part Number 4937500. Refer to the Troubleshooting and Repair Manual, ISC and ISL Engines, Bulletin 4021418.
3. Stamp the engine data plate 0610 to show completion of this Campaign.
4. File a claim with parts and labor for the repair.

MATERIAL DISPOSITION: Materials removed **must** be scrapped.

REIMBURSEMENTS:

Parts:

Part Number	Description
3964144	Injector Fuel Tube
4955367	Kit

NOTE: Access SRTs, which are sufficiently explained in the narrative, may also be claimed on this TRP pre-work campaign.

Labor using applicable Access Code and Time:

SRTs to gain access that are required to complete the repair, that are sufficiently explained in the claim narrative, may also be claimed on this Campaign.

SRT Code	Description	Time
19-101	Administrative Time	
06-166	Fuel Line, Remove and Install	
99-999	Fuel Line Bracket, Install	0.4

Travel: Travel is covered under this Campaign, however, towing is **not** covered.

Other Claimables: Consumables are **not** covered under this repair.

CLAIM INSTRUCTIONS: *If applicable, this Campaign is eligible to be filed via* ***RAPID***SERVE™ Web.

CLAIM CODES:

Account Code: 65
Pay Code: ..... Distributor = X
Pay Code: ..... Dealer = D
Failure Code: ..... WFLRSB

Attachment A

Upfit this bracket on the high pressure fuel line that supplies the rail with fuel from the high-pressure pump on C- and L-Series engines equipped with the CM850 Fuel System.

Bracket Kit Part # 4937500

A new fuel line must be installed when installing the bracket.

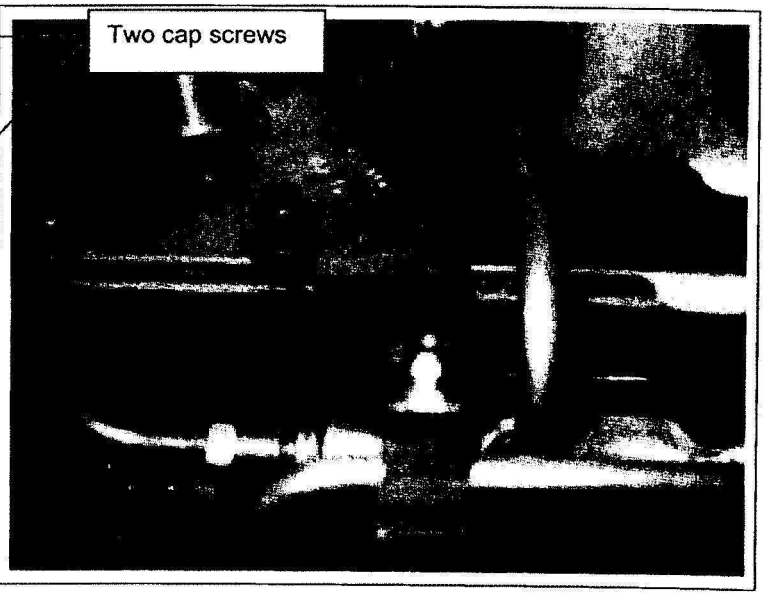
Installation Instructions

Remove the current high pressure fuel line	

Remove the two (2) cap screws on the top of the intake manifold cover plate.

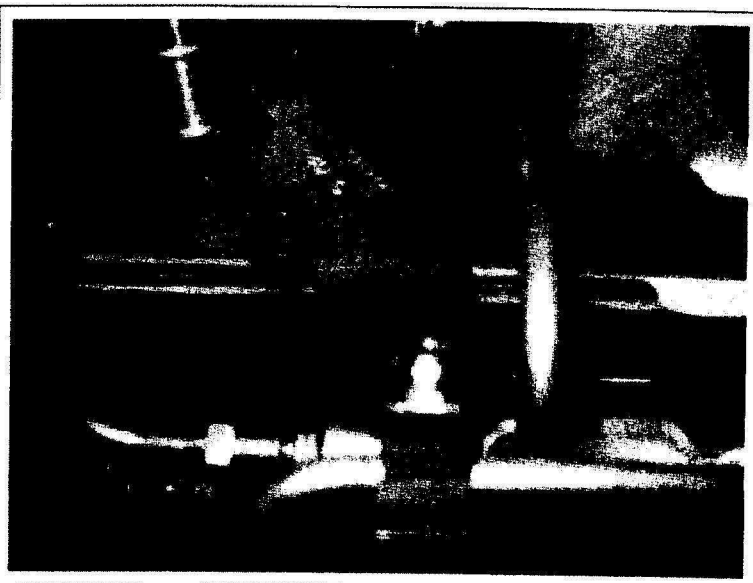
Install the bracket over the two (2) cap screw holes.

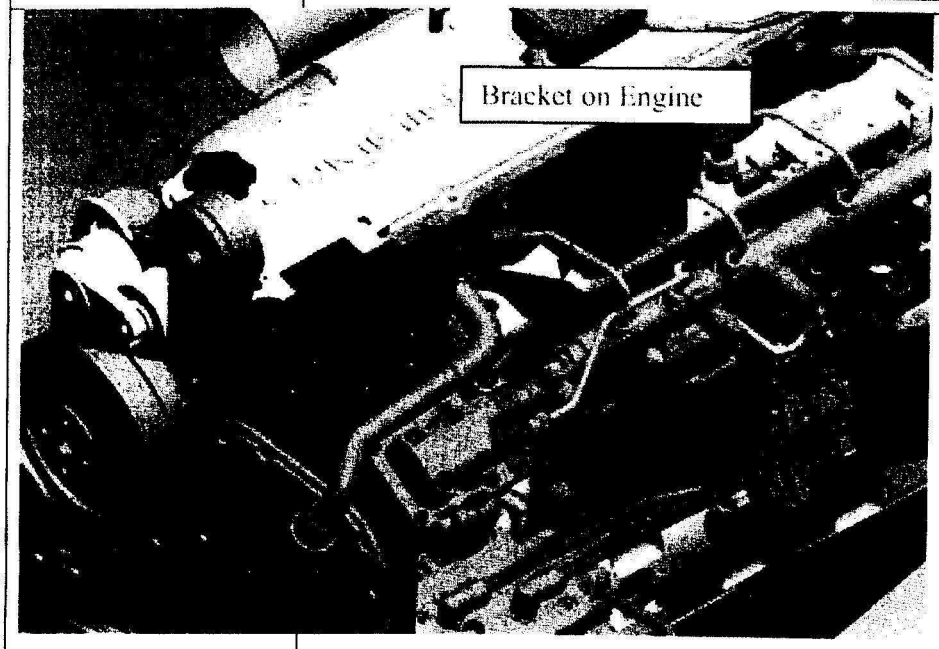
Initially, install the two capscrews finger tight.

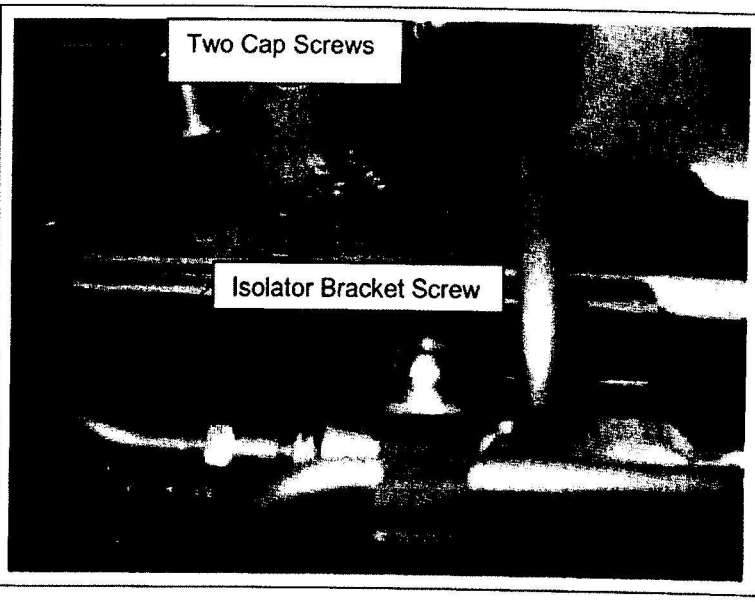


Install the fuel line finger tight between the bracket isolators.

Then, install the bracket isolator capscrew finger tight.





Tighten the bracket screws to the intake manifold cover plate. Torque Value: 24Nm [18 ft-lb]	
Tighten the isolator bracket screw. Torque Value: 9Nm [7 ft-lb]	
Start the engine and check for leaks.	

Stamp the data plate 0610 showing completion of this campaign.