



INTERNATIONAL TRUCK AND ENGINE CORPORATION
3033 WAYNE TRACE, FORT WAYNE, IN 46806-3968

06V-479
(3 pages)

RECEIVED
2006 DEC 19 10 13 29

OFFICE OF THE ATTORNEY GENERAL
STATE OF INDIANA

TRUCK GROUP

December 19, 2006

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington D.C. 20590

Subject: Vehicle Defect Initial Information Report

Pursuant to Part 573.6 (c) (1), this Vehicle Defect Initial Information Report is submitted to the National Highway Traffic Safety Administration by **IC Corporation, a wholly owned subsidiary of International Truck and Engine Corporation.**

(1) IDENTIFICATION OF VEHICLES [Part 573.6 (c)(2)]

- Vehicle Models Involved:
 - CESB (PB105), Model Years 2007, 2008
 - FESB (PB205), Model Years 2007, 2008
 - RESB (PB305), Model Years 2006, 2007, 2008
 - BESB (PB405), Model Years 2007, 2008
 - CECB (PC105), Model Years 2007, 2008
 - FECB (PC205), Model Year 2007
 - RECB (PC305), Model Year 2007
 - BECB (PC405), Model Year 2007
- Vehicle Manufacturing Dates:
 - October 11, 2005 through October 31, 2006
- Other Identification Necessary to Describe Vehicles:
 - With driver seat property codes 0048vur, 0048vuj, 0048vup, 0048vuk
 - Manufactured at Conway, Arkansas and Tulsa, Oklahoma Bus Plants

(2) COMPONENT MANUFACTURER [Part 573.6 (c)(2)(iv)]

- This report does not relate to a component supplied by a manufacturer other than IC Corporation.

(3) *VEHICLE POPULATION INVOLVED [Part 573.6 (c)(3)]*

Model	U.S. Quantity	Canadian Quantity	Export	Totals
CESB	1720	0	0	1720
FESB	108	0	0	108
RESB	40	0	0	40
BESB	83	0	0	83
CECB	9	0	0	9
FECB	40	0	0	40
RECB	7	0	0	7
BECB	1	0	0	1
Grand Totals	2008	0	0	2008

(4) *PERCENTAGE OF VEHICLES ESTIMATED TO CONTAIN THE DEFECT [Part 573.6 (c)(4)]*

- All (100%) of the vehicles in the suspect population are estimated to contain one or more defects related to the driver's seat.
 - Vehicles with any one of the four (4) property codes may exhibit defect 1.
 - Vehicles with property code 0048vur only, may exhibit defect 2, 3, or 4.

(5) *DESCRIPTION OF DEFECT [Part 573.6 (c)(5)]*

- Defect 1 - air and manually adjusted ABTS (All Belts To Seat) seats (0048vur, 0048vuj, 0048vup, 0048vuk)
 - If the driver's seat is in the highest and most rear position, the back of the seat may lean against a barrier behind the seat, or against other items stored behind the seat, thereby pushing the belt against the seat back, and preventing the seat belt from retracting.
 - Failure of the belt to retract in this seat position is noncompliant to FMVSS 209, paragraph S4.3.j.1.vi, which states that the retractor "shall exert a retroactive force not less than 1 N and not more than 7 N under zero acceleration".
- Defect 2, 3, 4 - manually adjusted ABTS seats (0048vur)
 - When adjusting the seat to a higher position, the driver may pull the seat past the last stop so that the seat sits on the adjustment pin, which allows the seat to teeter on top of the pin. The seat has adjustable tethers that may not be properly adjusted to prevent over-travel.
 - If over-travel occurs, the upper seat pedestal tube could separate from the lower pedestal tube during vehicle operation.
 - If the driver is sitting in the driver's seat and reaches to adjust the seat height, their weight will cause the seat to drop, which could result in their hand becoming pinched between the seat and the lever.
 - This may result in personal injury.
 - The driver's seat is difficult to adjust to a higher position because of the additional weight of the ABTS design.
 - This may result in personal injury.

(6) *CHRONOLOGY OF PRINCIPAL EVENTS WHICH LED TO DETERMINATION OF A SAFETY DEFECT or TEST RESULTS THAT LED TO DETERMINATION OF NONCOMPLIANCE [Part 573.6 (c)(6)/(7)]*

- 08/22/2006 IC receives first complaint from customer regarding driver's seat.
- 09/19/2006 International begins testing seat belt cover configurations and other changes for possible failure modes.
- 10/16/2006 International approves seat belt cover modification and additional changes to manually adjusted seat.
- 10/31/2006 Containment actions put in place at Conway, Arkansas and Tulsa, Oklahoma.
- 12/05/2006 International runs vehicle search to determine extent of suspect population.
- 12/14/2006 International declares safety recall.

(7) *PROGRAM TO REMEDY DEFECT [Part 573.6 (c)(8)]*

- All suspect vehicles will have a metal cap installed over the top of the seat belt where it passes through the seat. This will prevent compression of the seat belt against the seat back.
- Vehicles with manually adjusted seats will be inspected for the presence of a travel stop. If the stop is not present, a non-adjustable tether will be installed.
- The existing handle on manually adjustable seats will be replaced with a new handle that allows additional hand clearance.
- On manually adjustable seats, an additional spring will be placed in the seat channel to decrease the lifting efforts required to raise the seat.

(8) *PLAN FOR REIMBURSEMENT [Part 573.6 (c)(8)(i)]*

- All vehicles do not fall within the warranty period; therefore, our plan for reimbursement of pre-notification remedies, on file and dated 8/30/2005, applies.

(9) *SCHEDULE FOR RECALL NOTIFICATION [Part 573.6 (c)(8)(i)]*

- Dealers will be notified by 02/07/2007
- Customers will be notified by 02/14/2007

(10) *INTERNATIONAL RECALL NUMBER [Part 573.6 (c)(11)]*

- 06512 (NHTSA number not assigned yet)

The undersigned should be contacted for any additional information regarding this recall on (260) 461-1890.

Very truly yours,



R. L. Van Laar

Compliance Manager

INTERNATIONAL TRUCK AND ENGINE CORPORATION