



---

MACK TRUCKS, INC.  
7900 NATIONAL SERVICE RD.  
GREENSBORO, NC. 27409

May 1, 2007

Mr. George H. Person  
Chief, Recall Management Division  
Office of Defect Investigations  
U.S. Department of Transportation  
National Highway Traffic Safety Administration  
400 Seventh Street S.W.  
Washington, D.C. 20590

Re: Suspension of Mack Safety Recall SC0317, ASET™ AC Engine  
Fuel Injection Lines (NHTSA Recall #06V-392)

Dear Mr. Person:

On March 20, 2007, a letter was sent to you that outlined the actions that Mack Trucks, Inc. ("Mack") would be taking to correct the issues associated with the fuel injection line safety recall on the ASET™ AC Engine. At that time, I was unable to comment on the timing of the program because we were still working with suppliers to confirm lead-times.

I am now pleased to report that we have identified the lead-times and that I can further elaborate on what Mack will do to correct this issue. The overall program involves simplification of repair instructions, new repair tools, and use of a new fuel injection line.

In the March 20<sup>th</sup> letter, I reported that the repair instruction must be simplified. The original repair instructions accommodated different torque tools and extensions available at Mack service facilities; however, the technician had to perform certain calculations to determine the appropriate torque to apply for the different tools and extensions. To simplify this, Mack has developed three repair tools that will be used exclusively for the repairs and therefore the technician will not have to perform a calculation. This will ensure appropriate torque is applied at both ends of the injection line. Additionally, Mack has revised the repair instruction to document the use of the new tools and has developed a training video showing the repair. The new tools, repair instruction, and training video will be supplied to all Mack Dealers before the end of this month, and will ensure that the repair is done in a quality way and in a consistent manner.



Mack has been working with a new supplier to develop an improved injection line that is less susceptible to leaks when the line is replaced. The large number of vehicles (~40,000 vehicles or 240,000 fuel injection lines) affected by the recall will require several months to procure all of the fuel injection lines (reference attachment 1). Mack will continue to try to improve these lead-times.

Typically, we would wait to release the recall until a large percentage of the parts are secured in our distribution warehouses. Considering the long lead-time for procuring the injection lines, Mack will propose a "staged release" of this recall where we will prioritize repair of vehicles or segments according to risk. This will allow Mack to address vehicles as parts are received instead of waiting for all the parts for all vehicles to be procured. I will be supplying a "staged release plan" to you for review this month.

To mitigate the risk to the drivers and the public until all the vehicles are repaired, Mack has released an inspection procedure (see Attachment 2) to the owners that can be used by the drivers as an interim measure.

There have been also additional activities associated with the recall, which are:

1. Initiating an additional safety recall to remove sleeves that were installed as part of the initial recall repair (NHTSA Recall #07V-159) (reference attachment #3); and,
2. Informing Dealers of all additional vehicles that will be included in the recall (reference attachment #4); and,
3. Mailing owner notices (reference attachment #5) to owners that were not notified as part of the original owner mailing because Mack thought the original corrective action (i.e. inspection, repair leaking lines, and installing the protective sleeves) was sufficient to address the safety defect.

To avoid confusion moving forward, Mack will release a new Information Report (i.e. 573 report) to your office that should replace the initial report and that will cover the entire population of vehicles affected by the recall which is thirty nine thousand three hundred and fifty-five (39,355).



Additionally, Mack will not reuse the original Mack recall number, SC0317, and will release all future correspondence to dealers and owners under a new Mack Recall number(s) that will supersede the original recall.

I am planning a visit to your office on May 16<sup>th</sup> and will be available to discuss this further at your convenience. If you have any questions regarding this information, please don't hesitate to contact me.

Yours truly,

Tim L. LaFon  
Manager,  
Regulatory Affairs  
Mack Trucks, Inc.  
Telephone: (336) 393-2233  
Email: [timothy.lafon@volvo.com](mailto:timothy.lafon@volvo.com)

Delivery Week			Delivery Week		
WEEK ENDING	DELIVERY QUANTITY	ACCUM. TOTAL	WEEK ENDING	DELIVERY QUANTITY	ACCUM. TOTAL
1-Jun			29-Dec	0	170,000
8-Jun	600	600	4-Jan	0	170,000
15-Jun			11-Jan	7,500	177,500
22-Jun	600	1,200	18-Jan	7,500	185,000
29-Jun			25-Jan	7,500	192,500
6-Jul			1-Feb	7,500	200,000
13-Jul	4,000	4,000	8-Feb	7,500	207,500
20-Jul	4,000	8,000	15-Feb	7,500	215,000
27-Jul	6,000	14,000	22-Feb	7,500	222,500
3-Aug	6,000	20,000	Feb-29	7,500	230,000
10-Aug	7,500	27,500	7-Mar	7,500	237,500
17-Aug	7,500	35,000	14-Mar	7,500	245,000
24-Aug	7,500	42,500	21-Mar	7,500	252,500
31-Aug	7,500	50,000	28-Mar	7,500	260,000
7-Sep	7,500	57,500	4-Mar	7,500	267,500
14-Sep	7,500	65,000	11-Mar	7,500	275,000
21-Sep	7,500	72,500	18-Mar	7,500	282,500
28-Sep	7,500	80,000	25-Mar	7,500	290,000
5-Oct	7,500	87,500	2-May	7,500	297,500
12-Oct	7,500	95,000	9-May	7,500	305,000
19-Oct	7,500	102,500			
26-Oct	7,500	110,000			
2-Nov	7,500	117,500			
9-Nov	7,500	125,000			
16-Nov	7,500	132,500			
23-Nov	7,500	140,000			
30-Nov	7,500	147,500			
7-Dec	7,500	155,000			
14-Dec	7,500	162,500			
21-Dec	7,500	170,000			

## Attachment 2

An inspection of the six high-pressure fuel injection lines must be performed each day during the normal pre-trip inspection, fluid level check, etc. Inspect the fuel lines as follows:

1. Before starting the engine, open the hood and inspect the six high-pressure fuel lines for signs of fuel leakage. This inspection must include the injection line itself, as well as both ends of the line at the cylinder head connection and the Electronic Unit Pump (EUP) connection. Refer to the following illustration.

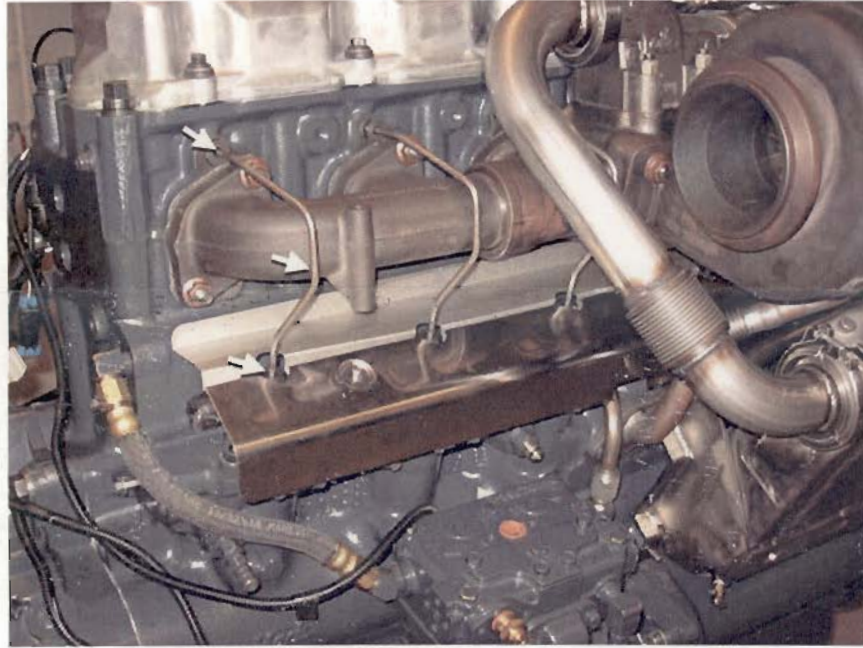


Figure 1 — ASET™ AC High-Pressure Fuel Injection Lines

2. If no leaks are found, keep the hood open and start the engine. If leaks are seen, DO NOT proceed, and DO NOT operate the vehicle. Call your local MACK dealer or the MACK OneCall™ CompleteCare center for further instructions.
3. Allow the engine to idle approximately 5 minutes, and then shut the engine off.

### **⚠ WARNING**

**DO NOT go near the right-hand side of the engine where the fuel injection lines are located during this short run time, as fuel leakage could be at very high pressure.**

4. With the engine shut off, recheck the six high-pressure fuel lines as described in step 1. If no leaks are seen, proceed with the remainder of the pre-trip inspection and subsequent normal operation of the vehicle.

If leakage is seen or suspected, DO NOT OPERATE the vehicle. Contact your local MACK dealer or the MACK OneCall™ CompleteCare center for further instructions.

### **⚠ DANGER**

***Vehicle owners must make the driver(s) aware that if fuel is smelled during operation, the vehicle must be stopped immediately in a safe location and the fuel lines must be inspected. If leakage is seen or suspected, DO NOT OPERATE the vehicle. Contact your local MACK dealer or the MACK OneCall™ CompleteCare center for further instructions.***



Attachment #3

U.S. Department  
of Transportation

400 Seventh Street, SW  
Washington, DC 20590

**National Highway  
Traffic Safety  
Administration**

*April 13, 2007*

TIMOTHY L. LAFON  
MANAGER, REGULATORY AFFAIRS  
MACK TRUCKS, INC  
PO BOX 26115  
GREENSBORO NC 27402

NVS-215paw  
07V-159

Subject: ASET AC FUEL INJECTION LINES

Dear MR. LAFON:

This letter is to acknowledge your recent defect information report. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**

MACK/CH/2007  
MACK/CHN/2007  
MACK/CX/2007  
MACK/CXN/2007

**NHTSA Campaign Number:** 07V-159

**Mfg's Report Date:** March 27, 2007

**Components:** FUEL SYSTEM, DIESEL

**Potential Number of Units Affected:** 8,441

**Summary:**

CERTAIN TRUCKS WERE RECALLED FOR THE INSTALLATION OF SLEEVES ON THE FUEL INJECTION LINE AS REQUIRED BY SAFETY RECALL SC0317 (NHTSA RECALL NO. 06V392). THERE IS A POSSIBILITY THAT THE NEW SLEEVES MAY CHAFE THE FUEL INJECTION LINE.

**Consequence:**

THIS COULD COMPROMISE THE FUEL INJECTION LINE OVER TIME WHICH COULD POSSIBLY RESULT IN AN ENGINE FIRE.

**Remedy:**

DEALERS WILL REMOVE THE PROTECTIVE SLEEVES ON ALL FUEL INJECTION LINES FREE OF CHARGE. THIS RECALL IS EXPECTED TO BEGIN ON OR ABOUT APRIL 19, 2007. OWNERS MAY CONTACT MACK TRUCKS AT 1-800-528-6586.

**Notes:**

MACK TRUCKS RECALL NO. SC0323. CUSTOMERS CAN ALSO CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S VEHICLE SAFETY HOTLINE AT 1-888-327-4236 (TTY 1-800-424-9153), OR GO TO [HTTP://WWW.SAFERCAR.GOV](http://www.safercar.gov).

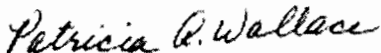
Please provide the following additional information and be reminded of the following requirements:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. As stated in your report, owner notification is expected to begin on or about April 19, 2007. Therefore, the first quarterly report will be due on or before July 30, 2007.

Your contacts for this recall will be Pat Wallace or Delia Lopez, who may be reached by phone at 202-366-5232 or 202-366-9525 or by email at [patricia.wallace@dot.gov](mailto:patricia.wallace@dot.gov) or [delia.lopez@dot.gov](mailto:delia.lopez@dot.gov). We look forward to working with you for successful completion of this recall campaign.

Sincerely,

*for*   
George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Attachment #4



# **Mack Trucks, Inc.**

## **Safety Recall ALERT**

**Date:** April 20, 2007

**Number:** SRA-222-004

**To:** All U.S. & Canadian Distributors

**Attention:** Service Manager, Warranty Manager, Parts Manager, Dealer Principal

**From:** Regulatory Affairs Department

**Subject:** ASET™ AC Fuel Injection Lines, Additional Chassis with Safety Defect

### **Important Information:**

Mack Trucks produced approximately 2,342 chassis at the factory with fuel injection line sleeves that were not included in the original SC0317 recall. Since the fuel injection line sleeves did not address the issue, these vehicles contain a safety related defect and therefore will require repair with the other chassis that require SC0317. A list of these additional chassis is available on the Trucks Dealer Portal in the Safety Recall area under SC0317.

Mack Trucks will be notifying the customers of these vehicles by First Class Mail during the week of April 23, 2007. The owner letter that they will receive is attached. This letter will notify the customer of the defect and inform them of the inspection instruction that is to be used as an interim measure until parts become available. These chassis will have "PI0632" loaded to them which will provide warranty coverage for vehicles that are out of warranty and require a fuel injection line repair and towing.

SC0317 will not be re-released when parts become available. Mack Trucks will instead issue a new Safety Recall which will replace SC0317 and include all chassis produced with ASET™ AC Engines (Approximately 39,355 vehicles).

There is a potential that a customer may present their vehicle for repair under SC0317 without having a fuel injection line leak prior to the release the new safety recall. If this happens, please instruct the customer that the recall is suspended and provide them with the inspection instructions that are to be used in the interim until parts are available.

Mack Trucks understands the need to have parts and repair instructions available and is working as quickly as possible to resolve the issue and will release the new recall as soon as possible.

### **Dealer's Responsibility:**

The National Traffic and Motor Vehicle Safety Act and Canadian Motor Vehicle Safety Act requires dealers to ensure that all new and used vehicles are free of safety defects and comply with all relevant safety standards at the time of delivery to the consumer.

Dealers should make their personnel aware of the safety recall. In the event that a dealer has a vehicle included in the safety recall in their inventory to be sold, the condition must be corrected before releasing it to a customer.

### **Questions:**

Contact the Regulatory Affairs Department at [vtna.regulatoryaffairs@volvo.com](mailto:vtna.regulatoryaffairs@volvo.com) if you have questions.

**SAFETY RECALL SC0317  
APRIL 2007**

**DEAR MACK TRUCK OWNER:**

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Mack Trucks, Inc. has decided that a defect, which relates to motor vehicle safety, exists in certain Mack CH, CHN, CX, and CXN model vehicles manufactured from January 2002 through February 2007.

**SAFETY DEFECT:** There exists the potential that a leak in the fuel injection line may spray fuel on the Exhaust Gas Recirculation (i.e. EGR) pipes that carry hot exhaust gases.

**SAFETY RISK:** This failure, if it occurs, could potentially result in an engine fire.

**PRECAUTIONS YOU CAN TAKE:** We have prepared an inspection procedure, which is attached, that **MUST be used in the interim until parts are available and your vehicle is repaired. This inspection procedure MUST be included in your pre-trip inspection.** Mack Trucks needs your help in reminding your operators to use vigilance in reporting any fuel odor or other indication of a fuel leak. If leaks are seen, DO NOT proceed, and DO NOT operate the vehicle. Call your local MACK dealer or if after hours contact the MACK OneCall™ CompleteCare center for further instructions.

**WHAT YOU SHOULD DO:** **PARTS ARE NOT AVAILABLE** for shipment to the dealers at this time; therefore, Mack Trucks **strongly recommends** that you follow the instructions in the precautions section above. If you find a fuel injection line leak, DO NOT operate the vehicle. Call your local MACK dealer or if after hours contact the MACK OneCall™ CompleteCare center for further instructions.

You can locate the closest Mack Parts and Service Center by going on line to <http://www.macktrucks.com/> and selecting "Dealer & Service Locations" or by calling our toll-free number: (800) 866-1177.

**NOTICE REGARDING LEASED VEHICLES:** If you are a Lessor of vehicles subject to this Notice, you have an obligation under Federal Law to provide a copy of this Notice to all Lessees within 10 days of your receipt of this Notice. Further, you must maintain a record, which identifies the Lessee(s) to whom you send a copy of this letter, the date you send this letter, and the Vehicle Identification Number(s) of the vehicle(s) that you have leased to that lessee. For purposes of this Notice, the term Lessor means: a person or entity that is the owner, as reflected on the vehicle's title, of any five or more leased vehicles (as defined in CFR Section 577.4), as of the date of notification by the manufacturer of the existence of a safety-related defect or non-compliance with a Federal Motor Vehicle Safety Standard in one or more of the leased motor vehicles.

**OWNER RECALL  
RESPONSE CARD:**

The enclosed "Notice of Vehicle Recall" identifies your vehicle. If you no longer own the vehicle, please help us update our records by completing the "Vehicle Disposition Record" portion of the enclosed postage-free Notice of Mandatory Safety Campaign card and mailing it back to us.

**ASSISTANCE/  
COMPLAINTS:**

Mack Trucks Inc.  
Regulatory Affairs Department,  
P.O. Box 26115  
Greensboro, NC 27402-6115  
[vtna.regulatoryaffairs@volvo.com](mailto:vtna.regulatoryaffairs@volvo.com)

You may also submit complaints to the Administrator of the National Highway Safety Administration (400 Seventh Street, S.W., Washington DC 20590 or call the toll-free Auto Safety Hot Line at 1-888-327-4236 (TTY: 1-800-424-9153), or go to <http://www.safercar.gov> if you believe that Mack Trucks Inc. has failed to remedy the defect without charge, or has failed to remedy the vehicle within 60 days of the owners first tender to obtain repair following the earliest time that parts are available.

**PRE NOTIFICATION  
REMEDIES:**

If you have previously paid for repairs as a result of this issue, you may be entitled to recovery of those expenses.

Submit copies of all documentation supporting your claim according to the rules specified in the "General Plan for Reimbursement of Pre-notification Remedies" provided in this mailing.

Mack Trucks is devoting all our energy to securing parts. We appreciate your patience during this time and we will be notifying you when parts become available.

We regret any inconvenience this may cause to your operation, but hope you will appreciate our sincere efforts to demonstrate Mack's commitment to provide our customers with the best possible product.

***MACK TRUCKS, INC.***