



RECEIVED
2007 JUNE 8
RECALL MANAGEMENT DIVISION

07V-233
(3 PAGES)

May 18, 2007

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

Subject: Vehicle Noncompliance 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 **Workhorse Custom Chassis, LLC** a wholly owned subsidiary of International Truck and Engine Corporation.

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

- Vehicle Models Involved:
 - MY 2001 thru 2007: P42 and W42 series Commercial Chassis.
- Vehicle Manufacturing Dates:
 - 8/27/2001 thru 9/25/2006
- Other Identification Necessary to Describe Vehicles:
 - Gross Vehicle Weight rating of 10,000 lbs and below with gasoline engines.

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

- This report does not relate to a component supplied by a manufacturer other than Workhorse Custom chassis.

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

<i>Model</i>	<i>U.S. Quantity</i>	<i>Canada Quantity</i>
P42	3,474	97
W42	700	1
Grand Totals	4,174	98

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

- Approximately 100% of the vehicles in the suspect population are estimated to contain the defect.

Post Office Box 110
922 S. State Route 32
Union City, Indiana 47390
Direct: 765.964.4000
Toll Free: 877.294.6773
Facsimile: 765.964.4001
Electronic: www.workhorse.com



A GVW Holdings Company

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

- Suspect population does not meet S5.6 of F/CMVSS 301 which states:

“Fuel spillage; rollover. Fuel spillage in any rollover test, from the onset of rotational motion, shall not exceed a total of 142 g for the first 5 minutes of testing...”

- Testing showed actual fuel spillage to be greater than 142g.

(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)]*

- 8/21/2006 Workhorse Custom Chassis conducts FMVSS 301 Compliance testing. Fuel spillage requirement was not met.
- 9/21/2006 Workhorse conducts simulations of FMVSS 301 Frontal Barrier Crash tests with potential fix for chassis built from MY2004 to MY2007. Simulations show Fuel tank complies with all applicable regulations when fix is applied.
- 1/9/2007 Workhorse began additional compliance testing of diesel powered chassis.
- 1/23/2007 Workhorse found that diesel powered chassis comply with all applicable regulations.
- 3/1/2007 Workhorse conducted compliance testing on vehicles built before MY2004 (7/1/2003) and found that they did not meet S5.6 of FMVSS 301.
- 3/29/2007 Workhorse began additional testing on vehicles built before MY2004 with potential fix.
- 4/3/2007 Workhorse concludes testing of potential fix for vehicles built before MY2004 (7/1/2003).
- 5/17/2007 Workhorse declares a non-compliance recall.

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

- All vehicles will be fitted with a new wide retaining ring and additionally any vehicles built prior to 7/1/2003 will also be fitted with an extra retention clip.



A GVW Holdings Company

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

- Some vehicles do not fall within the warranty period; therefore, our plan for reimbursement of pre-notification remedies, on file and dated 01/07/2007, does apply and instructions will be included in the customer notification.

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

- Parts availability is undermined as of this date. If parts do not become available within 60 days of the date of this letter an interim notification will be distributed according to the following schedule.
 - Notify WCC Dealers by: July 20, 2007
 - Notify WCC Customers by: July 27, 2007

(10) *WORKHORSE CUSTOM CHASSIS RECALL NUMBER [Part 573.6 (c)(11)]*

- 60701-C (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