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DEFECTS INVESTIGATION
RECALL MGMT DIV.

Mr. George Person
Chief, Recall Management Office
National Highway Traffic Safety Administration
400 7th Street, S.W.
Washington, D.C. 20590
September 17, 2007
Subject: 573 Submittal

07V-448
(6 Pages)

Dear Mr. Person:

Country Coach, LLC has received notification from Prevost Car Inc. that certain bus conversion motor homes may have a safety defect. Bendix Commercial Vehicle Systems LLC has determined that a manufacturing defect exists in the internal rubber check valves inside the SR-7 spring brake modulating valves manufactured between November 4, 2005 and April 17, 2007. In accordance with 49 CFR Part 573, Country Coach is providing notification to your office of this potential safety defect. To date, Country Coach has not been notified of any incidents or accidents involving the subject equipment.

Country Coach, LLC. will mail the owners of the subject bus conversions motor homes a Safety Defect notification and notify them of the Prevost Car Inc. offer to replace the identified defective valves free of charge. A Dealer Vehicle Safety Defect Service Bulletin will be mailed to all dealers as well. All mailings will be done on or before 1 October.

Please let me know if you have any questions.

Sincerely,

Dick Sabath
Country Coach Inc.
Senior Manager, Compliance Administration

Enclosures

Safety Defect Report
Prevost Safety Recall Notification dated 14 September 2007

National Highway Traffic Safety Administration

Safety Defect Report Pursuant to 49 CFR part 573

Country Coach, LLC has been notified by Prevost Car Inc. that certain bus conversion motor homes may have a safety defect in the internal rubber check valves inside the SR-7 spring brake modulating valves manufactured **between November 4, 2005 and April 17, 2007**. Country Coach is hereby providing notification to your office in accordance with 49 CFR Part 573.

The information required by your regulations follows.

1. **573.5 (c)(1) Manufacturer's name and address.**

Country Coach, LLC
135 East First Ave.
P.O. Box 400
Junction City, OR 97448

2. **573.5 (c)(2) Equipment involved in this notification:**

Model Year: 2007
VIN Range: 2PCW3349961028887 – 2PCW3349061028907
Vehicle Type: MPV
Bodystyle: Bus Conversion
Beginning and Ending Manufacturing Dates: November through December 2006

Model Year: 2008
VIN Range: 2PCW3349661028913 – 2PCW334967C729246
Vehicle Type: MPV
Bodystyle: Bus Conversion
Beginning and Ending Manufacturing Dates: February through August 2007

3. **573.5 (c)(3) Total number of items of equipment:**

A cumulative total of 15 units are involved. 9 units are consumer owned, 2 are dealer owned and 4 are still in production.

4. **573.5 (c)(4) Approximate percentage of equipment estimated to actually contain the noncompliance:**

According to Prevost Car Inc., 100% of the bus conversion motor homes identified in item 2, above, may exhibit the safety defect.

5. **573.5 (c)(5) Description of the noncompliance:**

Brief summary of noncompliance:

Country Coach, LLC has received notification from Prevost Car Inc. that the bus conversion motor homes identified in item 2, above, may have a safety defect. Bendix Commercial Vehicle Systems LLC has determined that a manufacturing defect exists in the internal rubber check valves inside the SR-7 spring brake modulating valves manufactured **between November 4, 2005 and April 17, 2007**. The component supplier of the internal check valve made unauthorized changes to its manufacturing process leading to the internal check valve rubber becoming deformed over time and potentially resulting in the check valve not properly seating. This condition can occur intermittently. The resulting leakage can cause a delay in the application of the spring brakes to park the vehicle after the operator pulls the parking brake control valve. The delayed parking brake application can occur without warning, leading to unintended vehicle rollaway. Normal service braking isn't affected by this condition.

Prevost asks its customers to perform the Bendix SR-7 valve recall campaign identification guidelines (Part 1). Only if the spring brake modulating valve is identified as subject to this recall, perform Bendix's internal check valve retrofit procedure described in this bulletin (Part 2).

A copy of the notice from Prevost Car Inc. is attached.

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

Prevost Car Inc.
Highway Coach Manufacturer
After-Sales Service Department/Service
850 Chemin Olivier
Saint-Nicolas, Quebec, Canada, G7A 2N1

7. **Chronological summary of events leading to this determination:**

September 17, 2007, Prevest Car Inc. notified Country Coach, LLC of a potential manufacturing defect that could exist in the internal rubber check valves inside the SR-7 spring brake modulating valves manufactured **between November 4, 2005 and April 17, 2007**. That these valves were installed in the bus conversion motor homes sold to Country Coach, Inc.

To date there have been no incidents reported to Country Coach, LLC involving the failure of subject check valves.

8. **573.5 (c)(8) Description of proposed remedy:**

Prevest Car Inc. will provide to all Country Coach owners, dealerships and authorized repair centers the necessary materials to remedy the manufacturing defect that exists in the internal rubber check valves inside the SR-7 spring brake modulating valves. Prevest Car Inc. will make all reimbursements for labor and parts through their AFA process. This work will be performed free of charge to the owner's of Country Coach bus conversion motor homes. The remedy is the same for consumer and production bus conversions.

9. **Program for Remedy Campaign:**

Country Coach, LLC. will notify all owners of the subject bus conversion motor homes of the Prevest Car Inc. offer to replace the identified defective check valves inside the SR-7 spring brake modulating valves free of charge. Safety defect notices will be mailed to the owners of the subject bus conversion motor homes and a Dealer Vehicle Safety Defect Service Bulletin will be mailed to all dealers on or before 1 October 2007. All mailings will be by Certified Mail, Return Receipt Requested, and First Class Mail.

Saint-Nicolas, September 14, 2007

Mr. George H. Person
Chief, Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400, Seventh Street S.W.
Washington, DC 20590 USA
Fax: (202) 366-7882

SUBJECT: SAFETY RECALL NOTIFICATION

Dear Mr. Person,

As a coach manufacturer, Prevost Car Inc. advises you in accordance with your safety law, Part 573.6, that we have found a defect on some of our vehicles that does not meet the US Federal Motor Vehicle Standards and Regulations part 573.5.

The vehicles potentially affected by the defect are as follows:

MAKE: PREVOST

Model	VIN's	Manufacturing Dates
H3-41, H3-45 coaches VIP motorhomes MODEL YEAR: 2006-2007	From 2PCH3341X6101 0448 up to 2PCV334907C71 0963 incl.	Between October 2005 and June 2007
XLII-45 motorhomes XLII-45 Entertainer X3-45 coaches MODEL YEAR: 2006-2007	From 2PCY334946102 8868 up to 2PCY334907C72 9252 incl.	

The total number of vehicles potentially affected by the defect is estimated to be 686 in the U.S. and 165 in Canada, and the total number of the potentially affected vehicles in North America manufactured between October 2005 and June 2007 is 851.

The estimated percentage of the potentially affected vehicles that contain the defect is 100 % of the total manufactured quantity.

THE DEFECT MAY BE DESCRIBED AS FOLLOWS:

Bendix Commercial Vehicle Systems LLC has determined that a manufacturing defect exists in the internal rubber check valves inside the SR-7 spring brake modulating valves manufactured between November 4, 2005 and April 17, 2007. The component supplier of the internal check valve made unauthorized changes to its manufacturing process. The combination of eliminating the post cure process and not increasing the mold temperature can lead to the internal check valve rubber becoming deformed over time and potentially resulting in the check valve not properly seating. This condition can occur intermittently. The resulting leakage can cause a delay in the application of the spring brakes to park the vehicle after the operator pulls the dash valve button. The delayed parking brake application can occur without warning, leading to unintended vehicle rollaway. Normal service braking is not affected by this condition. Bendix estimates that approximately 5% of the potentially affected SR-7 valves may exhibit this condition. There have been no reports of any injuries related to this issue.

THE EVENTS THAT WERE THE BASIS FOR THE DETERMINATION OF THE EXISTENCE OF A SAFETY DEFECT ARE:

In August 2006, Bendix received a returned SR-7 valve with a report of leakage consistent with delayed application of parking brakes. Bendix performed laboratory tests on the part, but could not duplicate the

leakage. In October 2006, Bendix received two other SR-7 valves with reported leakage. In December 2006, Bendix began analyzing all SR-7 valves returned under warranty but was not able to determine whether any defect existed. In February 2007, the Bendix Product Integrity Committee (PIC) opened its investigation of the issue. In March 2007, Bendix was informed by a vehicle manufacturer that it had duplicated the leakage issue on a vehicle, and representatives of Bendix visited the vehicle manufacturer's plant to investigate the matter and to obtain the affected valve for further evaluation at Bendix laboratories. Until this point Bendix was not able to isolate the primary contributing factors to the leakage. The investigation was further complicated by reported leakage in some SR-7 valves related to the Parker single check valve issue identified in a separate Defect Report filed with NHTSA on this date. In March 2007, Bendix received a report of a vehicle rollaway incident in the field involving minor property damage. In April, 2007 Bendix determined its supplier made unauthorized manufacturing changes by eliminating the post-cure process. During April and May, Bendix confirmed the impact of the post-cure process and the valve molding temperature on the functioning of the internal check valve. On May 31, 2007, Bendix decided that a defect that relates to motor vehicle safety exists with respect to the potentially affected SR-7 spring brake modulating valves.


MEASURES TO BE TAKEN TO REPAIR THE DEFECT:

Prevost Safety Recall Sr07-11, reproducing Bendix SR-7 Valve Recall Campaign No. 07E-037 will explain the complete procedure required. All vehicle owners with SR-7 valve built between November 4, 2005 and April 17, 2007 (inclusive) will be asked to replace the internal check valve cartridge.

As requested in paragraph 573.2 (8), three (3) copies of the letter that our customers (Defect Notification) will receive on that matter, and three (3) copies of Safety recall no. 07-11 are enclosed for your perusal.

If you require any information on that campaign, do not hesitate to contact us.

Truly yours,

A handwritten signature in black ink, appearing to read "Josyane Côté, Eng.", enclosed in a rectangular box.

Josyane Côté, Eng.

Technical Publications Manager