



January 7, 2008

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 7th Street, S.W. Suite 5319
Washington, D.C. 20590

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations - Defect and Noncompliance Reports, Collins Bus Corporation is submitting information relating to a safety recall we are conducting. Specific information is as follows:

573.6(c)(1) Vehicles affected are manufactured by:

Collins Bus Corporation, a division of Collins Industries, Inc.
P.O. Box 2946
Hutchinson, Kansas 67504-2946

573.6(c)(2) The following vehicle models are being recalled:

Collins Bus Corporation Bantam, Super Bantam, Grand Bantam, and Omni buses which had installed in them Collins lap/shoulder belt seats, built between November 2005 and June 2006.

573.6(c)(3) The total number of vehicles potentially containing the defect is:

Two Hundred and Ninety-Six (296); the majority of the buses are in the possession of end users. Some buses are in the possession of Collins Bus distributors awaiting delivery to end-users.

573.6(c)(4) The approximate percentage of the total number of vehicles to contain the defect is:

Due to the nature of the defect, and exact conditions required to cause the defect, the percentage of total vehicles to actually contain the defect can not be known until the retracting belts are visually examined. Due to this, all buses within the potential of the recall will be examined and then if necessary the retracting belts replaced.

573.6(c)(5) Description of the defect:

A Collins Bus Corporation customer alerted our warranty department of the belt web fraying on several of their retractable belts on the three-point belt seats that were installed in some of their buses. The fraying of the belts takes place as the belt is pulled out of the retractor during normal use. The web of the belt rubs up against the retractors metal sleeve causing friction and abrasion, and over time may fray the belt, thereby weakening it such that it may not pass the applicable FMVSS 209, 210 compliance testing. This condition is caused by the retractor assembly located at the base of the seat being misaligned with the rest of the seat structure. The misalignment may have been in place at the date of mfg. or the retractor may become misaligned during normal operation if a passenger kicks or rests their feet on this component of the seat in front of them.

The type of retractable belts being used in the three-point seats was changed in March of 2006. This style of retractor is designed such that the retractor assembly stays in alignment with the rest of the seat structure and belt sleeve. To date the revised retractable belt type has not exhibited any signs of belt fraying.

573.6(c)(6) The following is a summary of all the events that were the basis for determining the defect.

In August of 2007 a customer of Collins Bus notified Collins of the fraying of several of their retractable belts in their buses lap/shoulder belt seats. Collins Bus Corporation replaced all of the seats in this bus with new seats. Collins Bus Corporation conducted oral customer surveys with a major consumer of this type of seat. On December 13, 2007 Collins Bus received the first report of an additional unit with the reported defect. At this time Collins Bus Corporation determined that a safety recall was necessary to insure that the buses in the field have

their belts inspected for pre-mature fraying and replaced if necessary to assure compliance with applicable FMVSS regulation.

573.6(c)(7) Test results or data:

No physical testing has been done on the frayed belts. Visual inspection is used to determine whether the belts have been damaged due to abrasion against the retractor housing. Cycle testing has been performed by Collins Bus on the present retractor belt and after over 50,000 cycles of retracting and returning the belt to its original position the present retractor and belt shows no signs of appreciable damage or wear.

573.6(c)(8)(i) The defect will be corrected as follows:

If a faulty belt is detected the defect will be corrected by removing and replacing the faulty belt and retractor from the seat and replacing it with a new seatbelt assembly provided by Collins Bus Corp.

Customers will be instructed to contact Collins Bus Corporation, warranty department to obtain parts installation instructions and reimbursement for the defect. Collins Bus Corporation will monitor the recall and file the quarterly status reports.

573.6(c)(8)(ii) Correspondence to notify Collins Bus Corporation distributors and Customers of the safety recall:

Mailing of Customer and Distributor notification letters are scheduled to be sent out during the week of January 21, 2008. Parts are anticipated to be available at the time of the mailing.

573.6(c)(10)

Attached is a copy of the proposed Owner Notification letter and Owner Response Postcard that Collins Bus Corporation will send to the vehicle owners.

573.6(c)(11)

Collins Bus Corporation will use the campaign identification number assigned by NHTSA.

Should you need further information, my contact information is as follows:

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Fax: 620-662-8484
E-mail: steve.gladow@collinsbus.com
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P.O. Box 2946
Hutchinson, KS 67504-2946

Sincerely,

COLLINS BUS CORPORATION

Steve Gladow
Engineering Manager