

VIA MAIL



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February 12, 2008

Associate Administrator for Enforcement
NHTSA
ODI/Recall Management Division – NVS-215
Room W46-425
1200 New Jersey Avenue S.E.
Washington, DC 20590

08V-074
(4 pages)

RE: EQ08-001
NABI 2008-01

Dear Sir:

This letter is in response to NHTSA's letter to NABI's Mr. Dan Allen, received on or about January 31, 2008. The referenced letter referred to NHTSA Recall EQ08-001.

NABI would like to clarify that this issue was raised through email communiqué in September, 2007 (attached), wherein inquiries from NHTSA were sent to the undersigned, and responded to. As no further contact was made, NABI in good-faith believed the issue was adequately addressed with the responses provided and, as such, no notification was necessary.

However, pursuant to your recent letter regarding this subject, NABI has reviewed the relevant information, and in the abundance of caution, and to ensure the documentation is complete, NABI is issuing Recall 2008-01. Attached is a vehicle defect initial information report which is submitted pursuant to Parts 573.5, 151 (1), and 153 (1-6) of the National Traffic And Motor Vehicle Safety Act.

As this issue has been addressed by the equipment supplier, and the owner (singular) of the affected engines is aware the correction has been made, NABI respectfully requests no owner notification need issued. Additionally, as affected equipment has been corrected, NABI respectfully requests no quarterly reporting be required for this recall.

The undersigned should be contacted for any additional information regarding this recall.

Very truly yours,

North American Bus Industries (NABI)

A handwritten signature in black ink that reads "Jim Johnson/af". The signature is written in a cursive, flowing style.

Jim Johnson
Director, Service and Warranty
NABI/Optima/Blue-Bird Transit

Enclosures NABI 2008-01 Initial Defect report
Email communiqué September 2007

MAKE	MODEL	MODEL YEAR	NUMBER OF VEHICLES	MANUFACTURED DATES		OTHER IDENTIFICATION NECESSARY DESCRIBE VEHICLE
				FROM	THROUGH	
NABI	40LFW	2006	25	XXXX	XXXX	Certain 40' transit buses equipped with a Cummins ISL diesel engine.

Total number of vehicles: 25 Percent Potentially Containing Defect: 100%

DESCRIPTION OF DEFECT:

On affected engines, the high pressure fuel line may crack, allowing high pressure diesel fuel into the engine compartment.

RISK TO MOTOR VEHICLE SAFETY:

If the line cracks and certain conditions are present, an increase of fire risk could exist.

1) CHRONOLOGY OF PRINCIPAL EVENTS WHICH LED TO DETERMINATION OF DEFECT:

1. NABI was notified by NHTSA on or about September 08, 2007, advising of a concern from ODI on the instant fuel line.
2. NABI received email inquiries from NHTSA on September 10, 2007, and replied to NHTSA on September 12, 2007.
At this point, NABI presumed no further action, as all affected engines (26 total; 25 in vehicles, 1 spare) had been corrected, and no comments were received from NHTSA regarding the September 12, 2007 email responses. (Email attached for reference.)
3. On or about January 31, 2008, NABI received correspondence from NHTSA inquiring about NABI's report for this matter. (RE: EQ08-001)
4. On or about February 05, 2008, NABI determined to issue this recall notification.

2) MEASURES TO BE TAKEN TO REPAIR VEHICLE:

N/A. (Affected vehicles have been repaired by the equipment OEM.)

3) REMEDY EXPENSE:

The remedy was provided at no cost to the end user.

4) EARLIEST DATE TO BE REMEDIED:

N/A. (Affected vehicles have been repaired by the equipment OEM.)

5) PUBLIC ANNOUNCEMENT DATE:

There will be no public announcement.

6) OWNER LETTER/QUARTERLY REPORTS:

NABI respectfully requests confirmation on owner notification, as the owner initially brought the issue to NABI's attention, and is aware the condition has been rectified, therefore any owner notification would be moot.

NABI respectfully requests that no quarterly reports be required for this issue, as the vehicles have been corrected by the equipment OEM.

Foy, Allison

From: Johnson, Jim
Sent: Wednesday, September 12, 2007 10:13 PM
To: 'Tom.Bowman@dot.gov'
Subject: RE: [NEWSENDER] - Cummins Campaign addresssing High Pressure fuel line in Transit Bus Applications - Message is from an unknown sender

Mr. Bowman:

I have reviewed the "Cummins Field Campaign", "Number C0610" faxed separately and referenced below in your email. I will respond to each of your items (copied in entirety), with my comments in **bold**:

- (1) bring this to your attention **JJ – acknowledged [end]**.
- (2) determine if NABI has deployed any type of notice to their customers or, in light of this potentially new information (which pertains solely to transit busses at this time), whether they intend to **JJ - NABI does not intend to transmit a notice (see Note below) [end]**.
- (3) determine whether NABI vehicles have experienced any (confirmed or suspected) fires due to failure of the high pressure fuel line in the subject engines / vehicles **JJ - no such instances have been reported [end]**.
- (4) determine whether NABI as received any reports of broken, cracked, leaking, etc high pressure fuel lines in the subject engines / vehicles. **JJ – NABI Service was verbally advised by the end-user of the leak condition, and the local Cummins distributor was aware, and the distributor would campaign the item [end]**.

Note: After receipt and review of this information from NHTSA, and inquiring with the Cummins OEM Service Account Manager, Cummins confirmed to NABI the 25 engines installed in our buses (plus one spare engine) had this campaign completed, hence the reason for no intent by NABI to issue a bulletin or notice.

Please let me know if you have any comments or need clarification. (As I travel frequently, email is the best method. If telephonic contact is desired, please use 256.453.7181.)

Thank you,
 Jim Johnson
 Director
 NABI/Optima/Blue-Bird Transit Service and Warranty

From: Tom.Bowman@dot.gov [mailto:Tom.Bowman@dot.gov]
Sent: Monday, September 10, 2007 9:26 AM
To: Johnson, Jim
Subject: [NEWSENDER] - Cummins Campaign addresssing High Pressure fuel line in Transit Bus Applications - Message is from an unknown sender

Pls note the Cummins bulletin faxed to you earlier today and briefly mentioned in our phone call.

Cummins has been campaigning (since April 2006) the high pressure fuel line in certain engines engaged in transit service (only).

Cummins has advised NHTSA that they do not believe that this failure mode poses an unreasonable risk of fire. NHTSA anticipates that a high pressure fuel line leak may pose several possible risks such as (1) fire; (2) disabling the vehicle; and/or (3) oil spill that "slicks" the highway risking that trailing vehicles may skid, etc.

ODI has not yet initiated any formal investigation of this issue but is attempting to get a better understanding of the facts to determine whether additional investigation is warranted.

AT ODI's request, Cummins has informed ODI that NABI purchased 26 of the subject engines.

The purpose of this note is to

- (1) bring this to your attention
- (2) determine if NABI has deployed any type of notice to their customers or, in light of this potentially new information (which pertains solely to transit busses at this time), whether they intend to
- (3) determine whether NABI vehicles have experienced any (confirmed or suspected) fires due to failure of the high pressure fuel line in the subject engines / vehicles
- (4) determine whether NABI as received any reports of broken, cracked, leaking, etc high pressure fuel lines in the subject engines / vehicles.

Pls review and provide your response by next Friday, September 14.

For further discussion, you may contact Steve Butler, Director, Product Safety at Cummins

steven.r.butler@cummins.com

812-377-3713

(He is aware that I am providing his name to you.)

Tom Bowman
ODI-NHTSA
202-366-2583