

PIERCE MANUFACTURING, INC.

AN OSHKOSH TRUCK CORPORATION COMPANY - ISO 9001 CERTIFIED

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June 18, 2008

Daniel Smith (NVS-200)
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington DC 20590

08V-274
(2 pages)

Vehicle Recall **08V-xxx** TRW Steering Column

Dear Mr. Person:

Pierce has determined that a defect exists in the TRW steering column used in certain Pierce Arrow and Dash custom chassis. We therefore furnish notification of a defect to the National Highway Traffic Safety Administration, in accordance with 49 CFR Part 573, Defect and Noncompliance Reports.

Manufacturer's Identification Code: 39-0139830

1. Name of Manufacturer and Corporate contact:

Pierce Manufacturing Inc.
Roger Lackore, Director of Research and Development
Phone: 920 832-3249
FAX: 920 832-3092
E-Mail: rlackore@piercemfg.com

2. Identification of Vehicle Classification:

Make:	Pierce
Model Years:	1982 - 1991
Model:	Arrow – 1982 - 1991 Dash – 1983 – 1989 Dash D8000 – 1987 - 1989
Mfg. Date Beginning:	01/01/1982
Mfg. Date Ending:	12/31/1991

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2008 JUNE 20 A 10:35
DEFECTS INVESTIGATION
RECALL MGMT DIV.

3. Number of Potentially Affected Vehicles: 2372

4. Estimated Percentage of Vehicles Containing the Defect or Noncompliance: 25%

5. Description of the defect or non-compliance: The lower end of the TRW steering column (TRW part UC35017) is attached to a 90 degree gear box as it passes through the floor of the cab. If the shaft is not well aligned with the gear box input, a side load is induced in the lower shaft bearing. This side load can cause bearing failure. If the lower steering column bearing fails, the bearing race or compression spring cuts into the hollow steering shaft tube. Eventually the tube will wear thin enough for the steering column shaft to fail. The failure is most likely to occur on high-mileage vehicles during low speed, high steering effort events.

6. Chronology of Principal Events:

October 2001: Report of a broken steering column on unit E5498 in Lexington, KY. The unit was shipped in 5/90. The fire truck had just made a hard left turn and was starting to turn right when the failure occurred. The vehicle speed was 5-10 MPH. No personal injury or property damage occurred.

Seven additional trucks of the same vintage were inspected. One vehicle showed only very slight wear while the remaining vehicles were in excellent operating condition.

January 2008: Report of a broken steering column on a 1990 Arrow in San Diego, CA. The failure occurred at 217,845 odometer miles.

Ten additional 1990 Arrows in San Diego were subsequently inspected. On three of the ten trucks, the steering column was partially failed. The odometer mileage was between 124,527 and 179,614 miles.

April 2008: Pierce Arrow steering column retrofit kit developed. The TRW UC35017 steering column is no longer in production.

7. Test Results or Data on which the Noncompliance was Determined: Vehicle inspections in San Diego, CA.

8. Corrective Action: Replace the original TRW steering column with a new TRW steering column retrofit kit.

9. Representative Notices: Will be sent when complete.

Sincerely,
Pierce Manufacturing, Inc



Roger Lackore, P.E.
Director of Research and Development