

August 27, 2008

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington D.C. 20590

Subject: Vehicle Defect Initial Information Report – Navistar Campaign 08509

Ref: 07E-097

Dear Associate Administrator:

Pursuant to Part 573.6 (c) (1), this Vehicle Defect Initial Information Report is submitted to the National Highway Traffic Safety Administration by Navistar Inc on behalf of IC Bus, LLC, a wholly owned subsidiary.

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

- Vehicle Models Involved:
 - MY 2007 thru 2009 IC Bus model BE, CE, FE, and RE school buses.
- Vehicle Manufacturing Dates:
 - 1/4/06 thru 11/15/07
- Other Identification Necessary to Describe Vehicles:
 - Equipped with a Ricon “S” and “K” (1200, 2000, and 5500) series wheelchair lift applicable to NHTSA recall 07E-097.

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

- This report relates only to a component supplied by Ricon Corporation.
- Contact information is:

Oscar Pardinas
Vice President Sales and Marketing
Ricon Corporation
7900 Nelson Road
Panorama City, CA 91402
818-267-3001 ext 3085

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

Model	Number of Suspect Vehicles		
	United States	Canada	Export
BE School Bus	223	9	0
CE School Bus	1246	36	1
FE School Bus	114	0	0
RE School Bus	24	1	0
Total Vehicles	1607	46	1

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

- It is estimated that all (100%) of the vehicles in suspect population could have the defect.

(5) DESCRIPTION OF DEFECT [Part 573.6 (c)(5)]

- Certain school buses manufactured by IC Bus were equipped with certain Ricon “S” and “K” (1200, 2000, and 5500) series platform style wheelchair lifts that do not comply with S6.10.2.3 of Federal Motor Vehicle Safety Standard No. 403, Platform Lift Systems for Motor Vehicles.
- FMVSS 403 S6.10.2.3 requires that “the interlock must prevent the lift from stowing” when the test device specified in S7.1.4 is placed “... on its narrowest side on any portion of the platform surface...”.
- The anti-stow interlock of the suspect wheelchair lifts may not detect the presence of the test device when it is located close to the pivot point of the platform.

(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)]

- 7/23/08 – Navistar Compliance receives notification of Ricon safety recall 07E-095 dated 6/23/08.
- 8/15/08 thru 8/20/08 – Navistar starts periodic meetings with wheelchair lift supplier, Ricon Corporation, to develop consensus on root causes, sufficiency of proposed field actions, and scope of suspect population.
- 8/20/08 – Based on suspect lift shipping records Navistar determined the suspect population.
- 8/21/08 – Navistar declares a noncompliance recall.

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

- The wheel chair lift on all the suspect vehicles will be inspected and repaired as necessary. The repair will involve adjustment of the pressure switch that controls the anti-stow interlock.

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

- Some of the vehicles in this recall fall outside the warranty period; therefore, Navistar's plan for reimbursement of pre-notification remedies, on file and dated 1/4/2007 applies and instructions will be included in the customer notification.

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

- Availability of repair parts is undetermined as of the date of this report.
- If repair parts are not available within 60 days of the date of this report an Interim Notice will be mailed to customers by 10/31/08 and INTERNATIONAL® and IC Bus Dealers by 10/24/08.

(10) RECALL NUMBER [Part 573.6 (c)(11)]

- Navistar: 08509
- NHTSA: Not Yet Assigned

The undersigned should be contacted for any additional information regarding this recall on (260) 461-1890.

Sincerely,



R. L. Van Laar
Compliance Manager
Navistar, Inc.

RV:ta