



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

April 30, 2009

MR. J. ROGER LACKORE
DIRECTOR OF RESEARCH AND DEVELOPMENT
PIERCE MANUFACTURING
2600 AMERICAN DRIVE
APPLETON, WI 54912-2017

NVS-215kjs
09V-137

Subject: FMVSS 206/DOOR LATCHES

Dear MR. LACKORE:

This letter serves to acknowledge Pierce manufacturing's (Pierce) notification to the National Highway Traffic Safety Administration (NHTSA) of a noncompliance with the requirements of Federal Motor Vehicle Safety Standard No. 206, "Door Locks and door Retention Components," with the product listed below for which a safety recall campaign shall be conducted pursuant to Federal laws.

Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

PIERCE/ARROW XT/2008
PIERCE/IMPEL/2008
PIERCE/QUANTUM/2008
PIERCE/SABER/2008
PIERCE/VELOCITY/2008

NHTSA Campaign Number: 09V-137

Mfg's Report Date: April 27, 2009

Components: LATCHES/LOCKS/LINKAGES:DOORS:LATCH

Potential Number of Units Affected: 257

Summary:

PIERCE MANUFACTURING IS RECALLING 257 MY 2008 EMERGENCY VEHICLES MANUFACTURED BETWEEN JUNE 1 AND OCTOBER 31, 2008, EQUIPPED WITH TRIMARK DOOR LATCHES. THESE LATCHES FAIL TO COMPLY WITH THE TRANSVERSE PULL STATIC LOAD REQUIREMENTS OF FEDERAL MOTOR VEHICLE SAFETY STANDARD NO 206, "DOOR LOCKS AND DOOR RETENTION COMPONENTS." THE LATCHES MAY "POP" INTO THE SECONDARY LOCKING POSITION.

Consequence:

IN THE EVENT OF A VEHICLE CRASH, THE DOOR WOULD NOT HAVE PRIMARY CLOSING SECURITY WHICH COULD POSSIBLY LEAD TO INJURY OF THE VEHICLE OCCUPANT.

Remedy:

PIERCE WILL NOTIFY OWNERS AND REPAIR THE VEHICLES FREE OF CHARGE. THE SAFETY RECALL IS EXPECTED TO BEGIN DURING MAY 2009. OWNERS MAY CONTACT PIERCE CUSTOMER SERVICE TOLL-FREE AT 1-888-974-3723.

Notes:

PIERCE'S RECALL NO. 39-0139830. CUSTOMERS MAY CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S VEHICLE SAFETY HOTLINE AT 1-888-327-4236 (TTY: 1-800-424-9153); OR GO TO [HTTP://WWW.SAFERCAR.GOV](http://www.safercar.gov).

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

The information in your noncompliance report appears to satisfy the requirements of 49 CFR 573.6.

We have received Pierce's proposed owner notification letter and it is currently under review. You will be notified of any changes or concerns once our review is complete. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

Your contact for this recall will be Kelly Schuler, who may be reached by phone at 202-366-5227, by email at Kelly.Schuler@dot.gov, or through the office email at RMD.ODI@dot.gov. We look forward to working with you for successful completion of this recall campaign.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Person".

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement