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09V-152
(12 Pages)



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2009 APR 28 P 2:30
EQTS

Mr. George Person
Chief, Recall Management Division
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

RE: EQ09-003
09E-004

Dear Mr. Person:

This responds to your letter of April 8, 2009 regarding certain air brake system control valves manufactured by Haldex Brake Products Corporation (Haldex). You provided Oshkosh with a copy of a Defect Information Report (Part 573 report) filed in February 2009 by Haldex and requested Oshkosh to file its own Defect Information Report as the manufacturer of motor vehicles that may have been equipped with the valves that were the subject of Haldex' defect information report. On Monday, April 20, 2009, Oshkosh received a Part 577 notification from Haldex about this matter.

Oshkosh has prepared a Defect Information Report (Part 573 report) regarding these valves on vehicles manufactured by Oshkosh, and is enclosing the report with this letter.

Your letter asked for some additional information, which we are providing. First, you requested that we provide a copy of all communications between Oshkosh and Haldex related to this matter. The requested information is enclosed. You also asked for the date on which Oshkosh received notification of this matter from Haldex. Haldex first informed Oshkosh of a potential quality issue involving the valves on January 28, 2009, and advised that it would be working with NHTSA to determine the safety consequences of the quality issue. As you will see in the enclosed correspondence, Oshkosh requested Haldex to keep Oshkosh advised about the status of the discussions with NHTSA. On several occasions in February and March, Haldex advised Oshkosh that it was still in discussions with NHTSA however, Haldex did not advise in these communications that it had already made a safety-related defect determination and had filed it with NHTSA. Haldex formally notified Oshkosh of the safety-related defect determination in a letter received by Oshkosh on Monday, April 20, 2009.

Your letter also requested that Oshkosh identify its role in the distribution of the Haldex valves. Oshkosh is a manufacturer of new motor vehicles that contained the subject Haldex valves.

Mr. David C. Trimble

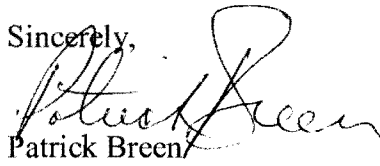
May 28, 2008

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Finally, your letter requested a schedule for Oshkosh's notification of its customers including a schedule for consulting current state motor vehicle registration records to update the original owner list. As stated in the Defect Information Report accompanying this letter, Oshkosh intends to undertake customer notification immediately upon approval by NHTSA of the customer notification letter. Oshkosh expects to be able to complete the notification mailing on a single date, rather than staggering the mailing. Oshkosh does not believe it is necessary to consult the state motor vehicle registration records to locate the potentially affected vehicles. Oshkosh has a current customer list for the all of the affected commercial vehicle owners.

Oshkosh appreciates this opportunity to cooperate with NHTSA.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Breen". The signature is written in a cursive style with a large, looped initial "P".

Patrick Breen
Associate General Counsel



DEFECT INFORMATION REPORT

1. Manufacturer's name/address:

Oshkosh Corporation
2307 Oregon Street
Oshkosh, WI 54903-2599

2. Vehicles involved in this defect notification:

All vehicles in this chart are MY 2008 vehicles:

Model Identification		Volume
Airport Rescue/Firefighting Vehicles	T-Series	20
	TX-Series	2
	STA Series	76
Commercial Highway Vehicles	H-Series	87
	H-Tractor	39
	P-Series	13
Commercial Concrete Mixer Trucks	S-Series	65
TOTAL		302

In addition, Oshkosh manufactured approximately 4600 tactical military vehicles for the United States Department of Defense that potentially contain the affected valves. Oshkosh is working with the Defense Department to address those vehicles.

3. Total number of vehicles or items of equipment:

This notification covers a potential population of 302 commercial vehicles.

4. Approximate percentage of vehicles or equipment estimated to actually contain the defect:

Haldex Brake Products Corporation has advised Oshkosh Corporation that it has identified 3113 air brake system control valves in a suspect population to be included in a safety recall campaign. Oshkosh has determined that it built 302 commercial vehicles in the time period that could have used one of these suspect Haldex valves, as well as a number of vehicles for the U.S. Department of Defense, as noted above. Oshkosh estimates that the percentage of vehicles that actually contain a suspect Haldex valve is 63.5%. However, all 302 commercial vehicles will be included in the notification campaign.

5. Description of the defect:

Haldex Brake Products Corporation has advised Oshkosh Corporation that certain air brake system control valves it delivered to Oshkosh contain an internal rubber diaphragm that could

delaminate and cause leakage and/or restrictions in air flow in the air brake system. Please see Haldex's Part 573 report for additional information.

6. Chronological summary of events leading to this determination:

In late January 2009, Haldex Brake Products Corporation advised Oshkosh of a potential quality issue regarding its Quick Release Valves and that it was working with NHTSA to determine the potential safety impact of the quality issue. Oshkosh requested Haldex to keep Oshkosh advised about the status of the discussions with NHTSA. On several occasions in February and March, Haldex advised Oshkosh that it was still in discussions with NHTSA however, Haldex did not advise in these communications that it had already made a safety-related defect determination and had filed it with NHTSA. In the meantime, Oshkosh began replacing the suspect valves on the military vehicles, as required by government contract for identified quality issues, whether or not such issues are safety-related. Some commercial vehicle valves were replaced as well, when the vehicles were presented for unrelated warranty service or otherwise available to Oshkosh for service (such as vehicles that were still in Oshkosh's possession before delivery). Oshkosh has received no reports of brake failure or other brake performance issues related to this valve from the field.

During the week of April 13, 2009, Oshkosh received a letter from NHTSA advising that Haldex Brake Products Corporation had made a formal defect determination with regard to the subject valves in February 2009, and requesting Oshkosh to file a defect information report pursuant to Part 573 of the agency's regulations. On April 20, 2009, Oshkosh received notification from Haldex about its defect determination. Oshkosh is filing this defect information report in response to the NHTSA letter and the Haldex notification.

7. Description of proposed remedy (including schedule for dealer and customer notification):

Haldex has advised Oshkosh that it will replace all affected valves at no cost to vehicle owners and will reimburse associated labor costs for the valve replacement actions.

Oshkosh expects to begin customer notification of this campaign as soon as possible following NHTSA approval of the customer notification letter. A draft customer notification is enclosed.

8. Program for remedy campaign (including program for reimbursing any consumer who obtained the remedy at his/her own expense within one year of this 573 report):

Oshkosh will notify its customers with vehicles potentially containing an affected Haldex valve, and instruct them to inspect their vehicles to determine whether they contain a valve manufactured within the timeframe identified by Haldex as covered by this recall. The customer notification will include instructions for the inspection and for replacing any valves determined to be included in the recall.

Oshkosh does not believe that any customers replaced affected Haldex valves at their own expense, as vehicles containing potentially affected valves are still under warranty. However, Oshkosh is aware that a substantial number of potentially affected valves have been replaced under warranty or under contractual provisions (with respect to the military vehicles). Oshkosh will account for these replacements on the non-military vehicles in its first quarterly report of completion in this campaign.