



Timothy J. Nalepka
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June 4, 2009

BY EMAIL AND
BY CERTIFIED MAIL

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS – 215)
1200 New Jersey Avenue, SE.
Washington, DC 20590

Re: PART 573 NOTICE RE KONI SHOCK ABSORBERS

Dear Sir or Madam:

I have enclosed Motor Coach Industries, Inc.'s ("MCI") Part 573 Defect and Noncompliance Report. MCI's proposed customer notification letter and enclosure will be sent subsequently under separate cover.

Please confirm receipt of this notice and provide NHTSA's reference number.

Thanks for your assistance with this matter.

Sincerely,
MOTOR COACH INDUSTRIES, INC.

By: Timothy J. Nalepka
Senior Vice President &
General Counsel

Enclosure

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report

On May 22, 2009, Motor Coach Industries, Inc. decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: **June 4, 2009**

Furnish the manufacturer's identification code for this recall (if applicable):

MCI Service Bulletin FCP 329

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

**Motor Coach Industries, Inc.
1700 E. Golf Road
Suite 300
Schaumburg, IL 60173**

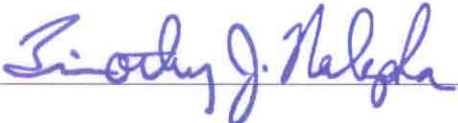
Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Bryan Couch, Vice President, Product Planning & Project Management

Telephone Number: **(204) 287-4447** Fax No.: **(204) 478-2867**

Name and Title of Person who prepared this report.

**Timothy J. Nalepka
Senior Vice President, General Counsel & Secretary**

Signed: 

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): MCI

Model Years and Models Involved: 2009 D4505

Production Dates: Beginning: February 2009 **Ending:** April 2009

VIN Range: Beginning: 58953 **Ending:** 59026

58953-58973 58990 59017-59021 59025-59026

Descriptive information which characterizes /distinguishes the recalled vehicles from those model vehicles not included in the recall:

The vehicles subject to the recall are the 2009 MCI model D4505 motor coaches equipped with Koni shock absorbers and FH946 tag axles.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

Approximately 40%.

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

<u>MODELS</u>	<u>MODEL YEARS</u>	<u>NUMBER OF VEHICLES POTENTIALLY INVOLVED</u>
D4505	2009	29

Total Number Potentially Affected by the Recall: 29

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

100% of all 2009 MCI model D4505 motor coaches equipped with Koni shock absorbers and an FH946 tag axle.

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

MCI determined the recall population by reviewing its records of coaches manufactured with Koni shock absorbers and an FH946 tag axle.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

In February 2009, MCI upgraded the D4500/D4505 models' tag axle load capacity from 12,000 lbs to 14,000 lbs. The upgrade included larger tag axle suspension air springs. These larger springs are capable of generating forces that, under certain conditions, could exceed the allowable tensile strength of the Koni tag axle shock absorbers that MCI had offered as an option for these models, on such coaches with an FH946 tag axle. The condition that can result in a failure of the Koni shock absorber is when the coach is moving in rear-rise mode. In this mode, air is routed to the rear axle suspension through a line that by-passes the suspension leveling valves. The rear of the vehicle will keep rising until the air pressure in the suspension air spring reaches the pressure setting of the high-rise regulator valve. At this point, equilibrium exists between the force exerted by the air springs, the vehicle weight, and the tension in the shock absorbers. With the increase of the air spring diameter, the shock tension required to maintain this equilibrium may exceed the shock absorber allowable tensile strength. This can result in the shock absorber piston separating from the cylinder, or the shock absorber separating from its mount, and in effect eliminating the mechanism that limits the suspension rebound travel. When traveling beyond its design rebound limit, the suspension may come in contact with the drive shaft and cause parts of the coach to shatter or otherwise become dislodged from the coach.

Describe the cause(s) of the defect or noncompliance condition.

The tag suspension air springs can generate force that exceeds the maximum allowable tensile strength of the Koni shock absorbers.

Describe the consequence(s) of the defect or noncompliance condition.

Shock failure during vehicle travel in rear rise mode could result in the tag suspension exceeding its design rebound limit, causing interference between the upper portion of the suspension and the driveshaft.

Identify any warning which can (a) precede or (b) occur.

MCI is not aware of any preceding warning for this failure. The failure occurrence may be accompanied by a loud noise caused by the separation of the shock absorber piston from the cylinder, or the separation of the shock absorber from its mount.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Not applicable

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Not applicable

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principal events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

In early April 2009, a customer notified MCI that the tag axle shock absorbers on the customer's 2009 D4505 coach had broken, with damage to the tag axle and tag tires. MCI inspected the subject coach and another of the customer's 2009 D4505 coaches, and discovered that the right tag shock absorber in the latter had also broken away from its mounting, resulting in the driveshaft coming into contact with the tag axle housing.

MCI replaced the damaged components and advised the customer to disable the tag axle rear raise feature while MCI conducted further analysis.

MCI Engineering analyzed the failures in May 2009, and determined that the larger air suspension springs previously mentioned in this report were capable of generating forces that could exceed the tensile strength of the Koni shock absorbers offered as an option in the 2009 D4505 model coaches.

Accordingly, MCI had decided to conduct a recall of the affected vehicles in order to replace the Koni shock absorbers with Gabriel shock absorbers on the tag and drive axles, and to reduce the maximum pressure of the vehicles' rear rise pressure regulator from 100 psi to 85 psi.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

Not applicable.

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

At its expense, MCI will replace the Koni shock absorbers with Gabriel shock absorbers on the tag and drive axles of the affected vehicles, and will reduce the maximum pressure of the affected vehicles' rear rise pressure regulator from 100 psi to 85 psi.

The allowable tensile load of the Gabriel shock absorber is 89 KN, which is higher than the maximum force that can be generated by the tag axle suspension air springs.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The replacement Gabriel shock absorbers are blue, while the Koni shock absorbers bear the Koni name and are orange.

The rear rise maximum pressure regulator setting is indicated on the regulator knob.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The production remedy is identical to the proposed field remedy. MCI has discontinued using Koni shock absorbers on the tag and drive axle suspensions in new coach production.

VI. Identify the Recall Schedule

9. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please identify any foreseeable problems with implementing the recall.

MCI anticipates sending notifications to customers within one week after receiving approval by NHTSA of MCI's draft customer notification. At the present time MCI does not foresee any problems in implementing the recall remedy on a timely basis.

VII. Furnish Recall Communications

10. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

MCI will submit this information in a supplemental report.