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February 16, 2010

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

Subject: Vehicle Defect Information Report (Initial)
Navistar Campaign 10504

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 on behalf of IC Bus, LLC, a wholly owned subsidiary.

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

- Vehicle Make / Model / Model Year Involved:
 - IC Bus / FE / 2010
 - IC Bus / RE / 2010
- Vehicle Manufacturing Dates:
 - 6/1/09 thru 8/19/09
- Other Identification Necessary to Describe Vehicles:
 - None

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

- This report relates to a component specifically manufactured for IC Bus, LLC.

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

Model	Number of Suspect Vehicles		
	United States	Canada	Export
FE Commercial Bus	13	0	0
FE School Bus	131	0	0
RE Commercial Bus	36	0	0
RE School Bus	119	9	0
Total Vehicles	299	9	0

(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)]

- The wires in the headlight electrical harness may have been installed in the incorrect connector cavities resulting in degraded low beam headlight intensity. The vehicle's low beam headlights do not meet the requirements of Federal Motor Vehicle Safety Standard (FMVSS) 108.

(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)]

- 8/13/09 – IC Bus manufacturing observed that the low beam headlights on buses were dimmer than normal.
- 9/15/09 – IC Bus manufacturing notified Navistar Compliance of the possible issue.
- 11/10/09 – Navistar received confirmation from the tier 2 headlight electrical harness supplier that the wires were incorrectly located in the terminal connector.
- 12/07/09 – Navistar received information from supplier that the low beam headlights with the incorrect wiring do not meet FMVSS 108 photometric requirements.
- 1/28/10 – Navistar determined the suspect population.
- 2/1/10 – Navistar Engineering compared the photometric data provided by the supplier with section 7.3.3, Table 27-1 of FMVSS 108 to determine the extent of the noncompliance.
- 2/10/10 – Navistar declares a safety recall.

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

- The remedy will require the inspection of the headlight electrical harness connector wiring and repair if necessary.

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

- Reimbursement of pre-notification remedies will not be necessary as all vehicles are within their warranty period. The notification letter will not include instructions for obtaining reimbursement of pre-notification remedies.

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

- It is estimated that the owner notification letter will be mailed by 3/31/10.

(10) MANUFACTURER'S CAMPAIGN NUMBER [Part 573.6 (c)(11)]

- 10504

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