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P: 260-461-1890
W: navistar.com

March 16, 2010

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington D.C. 20590Subject: Defect Information Report (Initial)
Navistar Campaign 10505

Dear Associate Administrator:

This defect information report is submitted pursuant to Part 573.6(a).

(1) MANUFACTURER'S NAME [Part 573.6(c)(1)]

- Navistar, Inc for its INTERNATIONAL[®] brand vehicles and on behalf of IC Bus, LLC, a wholly owned subsidiary.

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

- Vehicle Make / Model / Model Year Involved:
 - School Buses
 - IC Bus / BE / 2010, 2011
 - IC Bus / CE / 2010, 2011
 - IC Bus / FE / 2010
 - Non School Buses
 - INTERNATIONAL[®] / 3300 / 2009, 2010
 - INTERNATIONAL[®] / 4100 / 2010
 - INTERNATIONAL[®] / 4300 / 2010, 2011
 - INTERNATIONAL[®] / 4400 / 2010
 - IC Bus / BE / 2010, 2011
 - IC Bus / CE / 2010, 2011
- Vehicle Manufacturing Dates:
 - 1/28/09 thru 2/9/10
- Other Identification Necessary to Describe Vehicles:
 - Feature code 04085 Meritor WABCO hydraulic brake system.

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

- This report relates only to a component supplied by Meritor WABCO Vehicle Control Systems. Contact information is:

Alan Korn
 Meritor WABCO
 Vehicle Control Systems
 3331 W. Big Beaver Road
 Suite 300
 Troy, MI 48084
 T 248-435-4498
 E kornam@meritorauto.com

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

- School Buses

Model	Number of Suspect Vehicles		
	United States	Canada	Export
BE School Bus	330	8	0
CE School Bus	3349	1057	0
FE School Bus	1	0	0
Total Vehicles	3680	1065	0

- Non School Buses

Model	Number of Suspect Vehicles		
	United States	Canada	Export
3300 Bus	0	0	7
4100	2	0	0
4300	2	2	0
4400	1	0	0
BE Commercial Bus	0	1	0
CE Commercial Bus	3	18	0
Total Vehicles	8	21	7

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

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

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

- The parking brake may release if the brake system electronic control unit software misinterprets input signals generated from cycling the ignition switch more than once at a specific frequency.
- Release of the parking brake may cause a sudden, unexpected shift in vehicle position possibly resulting in property damage, personal injury, or death.

(7) 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)]

- 9/10/09 – Navistar Compliance received a single customer report of unexpected parking brake release during a diagnostic system check of an add-on aftermarket system that required multiple ignition switch cycles.
- 9/11/09 – Navistar was able to recreate the issue in laboratory tests by cycling the key at different frequencies. The issue could only be recreated at a very specific frequency. Navistar notified brake system supplier, Meritor WABCO.
- 9/18/09 – Meritor WABCO notified Navistar that their preliminary analysis indicated the root cause of the issue involves the Full Power plausibility check of the travel switch located in the Spring Apply/Hydraulic Release (SAHR) actuator.
- 9/19/09 thru 11/11/09 – Meritor WABCO develops software changes to contain the issue.
- 11/18/09 Navistar met to review the severity of the issue and agreed to move forward with implementing the software containment action at Wabco.
- 11/19/09 thru 2/9/10 – Meritor WABCO prepares and implements software change into production at the Tulsa Bus plant.
- 2/15/09 – Navistar determines suspect vehicle population.
- 3/10/10 – Navistar declares a safety recall.

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

- The remedy will involve the reprogramming of the vehicle's brake system electronic control unit.

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

- Pursuant to Part 573.13(d)(1) a plan for reimbursement of pre-notification remedies is not needed as all the vehicles are within their original warranty period.

(10) SCHEDULE FOR RECALL NOTIFICATION [Part 573.6 (c)(8)(ii)]

- It is estimated that the owner notification letter will be mailed by May 7, 2010.

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

- 10505

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