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By Recall Mgt Div. at 7:56 am, Jun 14, 2010

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

June 11, 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 10509

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 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 / 2009, 2010, 2011
 - IC Bus / CE / 2009, 2010, 2011
 - IC Bus / FE / 2009, 2010, 2011
 - IC Bus / RE / 2009, 2010, 2011
 - Non School Buses:
 - IC Bus / BE Commercial Bus / 2010
 - IC Bus / CE Commercial Bus / 2009, 2010, 2011
 - IC Bus / FE Commercial Bus / 2011
 - IC Bus / RE Commercial Bus / 2010, 2011
- Vehicle Manufacturing Dates:
 - 12/10/07 thru 1/12/10
- Other Identification Necessary to Describe Vehicles:
 - Equipped with Ricon wheelchair lifts with Navistar feature codes 49BRS, 49DEK, 49DEP, 49DEU, 49DET, or 49GHG.

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

- This report relates only to a component supplied by Ricon Corporation. Contact information is:

Oscar Pardinias
 Vice President Sales and Marketing
 Ricon Corporation
 7900 Nelson Road
 Panorama City, CA 91402
 818-267-3000

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

- School Buses:

Model	Number of Suspect Vehicles		
	United States	Canada	Export
BE School Bus	73	2	0
CE School Bus	1370	58	0
FE School Bus	25	0	0
RE School Bus	24	0	0
Total Vehicles	1492	60	0

- Non School Buses:

Model	Number of Suspect Vehicles		
	United States	Canada	Export
BE Commercial Bus	0	1	0
CE Commercial Bus	14	7	0
FE Commercial Bus	4	0	0
RE Commercial Bus	2	0	0
Total Vehicles	20	8	0

(5) 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.

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

- As stated in Ricon's Part 573 defect report for 09E-060: "The lift is equipped with a restraint belt. The restraint belt has an interlock feature. The design is such that the lift will not operate if the tongue is not fully inserted and latched in the buckle. However, if the tongue is not fully inserted and latched in the buckle, the lift will operate. Though the design of the Ricon restraint buckle has not changed in many years, a forced change due to the discontinuation of the original switch used in the buckle may be at the root of the current issue. The current switch is taller and therefore, engages sooner resulting in an increase in the distance between the switch engagement and buckle latching point. The switch change occurred in December 2007." "If the tongue is not fully latched in the buckle, the lift can operate and a wheelchair may not be adequately protected against movement."

(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)]*

- 4/22/10 – Navistar received a notification letter from Ricon relating to equipment recall 09E-060.
- 4/29/10 – IC Compliance initiated communications with Ricon to determine the extent of the issue on IC Bus products.
- 5/14/10 – IC Bus determined the extent of suspect lift population.
- 6/1/10 – IC and Navistar Compliance met to review Ricon documentation and ensure root cause.
- 6/9/10 – Navistar declares a safety recall.

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

- As stated in Ricon's Part 573 defect report 09E-060: "Affix a warning on the belt to 'Click and Tug' prior to lift operation."

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

- Navistar's plan for reimbursement of pre-notification remedies, on file and dated 1/5/09, applies and instructions will be included in the customer notification.

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

- It is estimated that the owner notification letter will be mailed by July 16, 2010.

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

- 10509

The undersigned should be contacted for any additional information regarding this recall on (260) 461-1890.

Sincerely,

A handwritten signature in cursive script that reads "R. L. Van Laar".

R. L. Van Laar
Compliance Manager
Navistar, Inc.

RV:ta