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By delia.lopez at 9:27 am, Oct 05, 2010

R. L. Van Laar
Compliance Manager

October 2, 2010

10V-463
(3 Pages)

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

Subject: Noncompliance Information Report (Initial)
Navistar Campaign 10516

Dear Associate Administrator:

This noncompliance 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 trucks.

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

- Vehicle Type / Make / Model / Model Year Involved:
 - Commercial Truck / INTERNATIONAL® / 7300 / 2011
 - Commercial Truck / INTERNATIONAL® / 7400 / 2011
 - Commercial Truck / INTERNATIONAL® / 7500 / 2011
- Vehicle Manufacturing Dates:
 - 7/14/10 thru 9/16/10
- Other Identification Necessary to Describe Vehicles:
 - Equipped with all wheel drive and radiator feature codes 12UBB or 12UBG.

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

- This report relates to a component manufactured by Navistar, Inc.

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

- Commercial Trucks:

Model	Number of Suspect Vehicles		
	United States	Canada	Export
7300	1	0	0
7400	29	0	0
7500	13	0	0
Total Vehicles	43	0	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 NONCOMPLIANCE [Part 573.6 (c)(5)]

- The headlight height of the suspect vehicles is 55.5 inches. This does not comply with the maximum headlight height of 54 inches specified in FMVSS 108 Table II as referenced in S5.3.

(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)]

- 9/15/10 - Navistar received notification from a body builder that the headlight height on recent delivered 7000 series all wheel drive vehicles may be too high.
- 9/17/10 - Engineering met to determine what vehicle options could cause the height issue. It was determined that certain all wheel drive 7000 series vehicles built with radiator codes 12UBB or 12UBG required a higher cab and hood mount, which could result in a possible non compliance to FMVSS 108.
- 9/17/10 – 9/23/10 Subsequent vehicle inspections determined that some vehicles could have headlights as high as 55.5”.
- 9/23/10 – A stop ship order was issued at the truck assembly plant, to prevent additional product from being shipped with the incorrect headlight height
- 9/27/10 – Determined suspect population of vehicles shipped with a possible headlight height issue.
- 9/29/10 – Navistar confirms noncompliance to FMVSS 108, paragraph S5.3, table II and declares a noncompliance recall.

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

- The final remedy will involve the disabling and concealing of the noncompliant headlights mounted in the hood and the installation of a new bumper with integrated headlights.

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

- 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)]*

- The schedule for recall notification is based on the availability of repair parts which cannot be determined at this time. However, a plan to mail an interim owner notification letter may be developed if the final remedy will not be available before 12/1/10.

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

- 10516

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