



October 27, 2010

Subject: New Safety Recall (SC0347, Conspicuity)**Attention:**

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Submitted via Email to Delia Lopez

The following information is submitted in accordance with the requirements of 49 CFR Part 573.6 as it applies to a defect relating to motor vehicle safety.

573.6(c)(1)

Mack Trucks, Inc. ("Mack")
7900 National Service Rd.
Greensboro, NC 27409

573.6(c)(2)

Certain 2011 Mack CHU and CXU model vehicles manufactured on July 13, 2010 through August 13, 2010 without rear mud flap hanger brackets.

The selection of vehicles was based on sales code.

573.6(c)(3)

There are approximately twenty-one (21) vehicles affected by the recall, which were manufactured for sale in the United States.

573.6(c)(4)

The percentage of the vehicles expected to contain the non-compliance is unknown.

573.6(c)(5)

The rear conspicuity treatment typically found on the mud flap hanger brackets may not have been installed in the alternate positions (e.g. back of cab) as allowed in the regulation on vehicles manufactured without rear mud flap hanger brackets; this results in a non compliance with safety standard 49 CFR 571.108, Lamps, Reflective Devices, and Associated Equipment.



573.6 (c)(6)

Not applicable

573.6(c)(7)

Chronology of principle events that were the basis for the determination:

- | | |
|----------|--|
| 8/19/10 | Vehicles observed at distribution facility without required conspicuity reflectors. Investigation opened |
| 10/9/10 | Scope Identified |
| 10/11/10 | Submitted to Product Safety Committee for recommendation. |
| 10/21/10 | Determination made of a non-compliance with a Federal Motor Vehicle Safety Standard. |
| 10/27/10 | NHTSA notified that Mack will conduct a voluntary safety recall to address the non compliance. |

573.6(c)(8)

Mack will initiate a voluntary owner notification, and recall all affected vehicles.

The recall repair will consist of inspecting and installing conspicuity treatment as required.

Reimbursement for cost incurred by the owner for “prenotification remedies” will be addressed on a case-by-case basis according to the “General Plan for Reimbursement of Pre-notification Remedies” which was published December 8th, 2004.

The number, which has been assigned to this recall by Mack, is **SC0347**.

A Safety Recall Alert will be released to dealers on or before October 29, 2010, which informs the dealers of the recall. Owner letters are tentatively scheduled to be mailed on or before December 1, 2010.

An advance copy of the owner’s letter will be submitted to NHTSA for review and approval prior to release to the owners.



If there are any questions regarding this information, please feel free to contact me.

Sincerely,

Tim L. LaFon
Manager, Regulatory Affairs
Mack Trucks, Inc.
7900 National Service Rd.
P.O. Box 26115
Greensboro, NC 27409
timothy.lafon@volvo.com
(336) 393-2233