



Timothy J. Nalepka
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February 28, 2011

BY EMAIL AND
BY CERTIFIED MAIL

11V-144
(6 Pages)

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS – 215)
1200 New Jersey Avenue, SE.
Washington, DC 20590

Re: **PART 573 NOTICE RE MCI 2010 J MODEL COACHES WITH BRAUN**
WHEELCHAIR LIFTS

Dear Sir or Madam:

I have enclosed Motor Coach Industries, Inc.'s ("MCI") Part 573 Defect and Noncompliance Report, proposed customer notification letter, draft Service Bulletin 347, and sample envelope and mailing label.

Please confirm receipt of this notice and provide NHTSA's reference number. Thanks for your assistance with this matter.

Sincerely,
MOTOR COACH INDUSTRIES, INC.

By: Timothy J. Nalepka
Senior Vice President &
General Counsel

Enclosures

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report

On February 14, 2011, Motor Coach Industries, Inc. decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: February 28, 2011

Furnish the manufacturer's identification code for this recall (if applicable):

MCI Service Bulletin 347

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Motor Coach Industries, Inc.
1700 E. Golf Road
Suite 300
Schaumburg, IL 60173

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

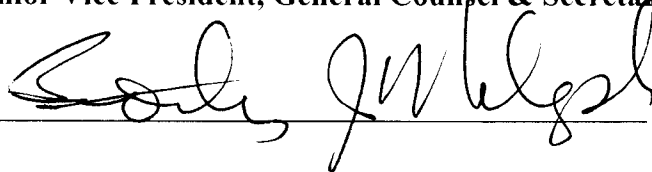
Jim Macdonald - Executive Director Engineering

Telephone Number: (204) 287-4949 **Fax No.:** (204) 478-2877

Name and Title of Person who prepared this report.

Timothy J. Nalepka
Senior Vice President, General Counsel & Secretary

Signed: _____



I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

All 2010 J model coaches equipped with a Braun wheelchair lift.

Make(s): MCI

Model Years and Models Involved:

Coach Model	Model Year	# Potentially Affected Units
J4500	2010	27

Production Dates:

1. 2010 J4500 **Beginning:** Oct 2009 **Ending:** Aug 2010

VIN Range:

65155	65502	65504	65507 to 65509	65514 to 65515
65521	65522	65554 to 65557	65571 to 65577	65579
65619 to 65623				

Descriptive information which characterizes /distinguishes the recalled vehicles from those model vehicles not included in the recall:

The electrical and hydraulic lines that service the wheelchair lift are routed inconsistently. In some cases, wires may be pinched during lift operation, which could result in a break of the wire insulation.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

The recall population is approximately 5% of the total J series coach population produced during the model year referenced above.

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Total Number Potentially Affected by the Recall: 27

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

MCI estimates that 50% of the recalled vehicles may have inconsistent wire clamping.

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

The recall population was determined by identifying the J model coaches built with a Braun wheelchair lift, and deleting from that population the coaches that were re-worked at the factory.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The clamping of the hydraulic lines and electrical wires is inconsistent, and doesn't always leave sufficient clearance for the lift to operate without potentially pinching these lines.

Describe the cause(s) of the defect or noncompliance condition.

MCI has identified a potential deficiency in the clamping method used to secure the hydraulic and electrical lines away from moving parts on the Braun wheelchair lift.

Describe the consequence(s) of the defect or noncompliance condition.

The lift may not operate if hydraulic lines or electrical wires are compromised. If exposed electrical wires are allowed to short to ground, then a potential thermal event could occur.

Identify any warning which can (a) precede or (b) occur.

Inspection of the hydraulic lines and electrical wires may reveal prior pinching of the lines or exposure of the bare wires if the insulation has been compromised.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

N/A

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principal events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

In June 2010, MCI received a customer complaint regarding potential pinching of electrical lines on the Braun wheelchair lift in the customer's MCI coach. MCI Engineering analyzed the issue and determined that improved clamping of the hydraulic and electrical lines would reduce the likelihood of the lines being pinched during operation of the wheelchair lift.

Accordingly, MCI implemented an improved clamping method using additional P-clips for the electrical and hydraulic lines starting with unit 65650. To reduce the likelihood of lines being pinched and exposing wires in coaches in the field, MCI decided to campaign all remaining vehicles with this type of wheelchair lift.

MCI has not received any reports of accidents, injuries, fatalities, or warranty claims (other than the customer complaint referenced above) with respect to this defect.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

N/A

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

MCI will provide, at no cost to customers, the parts and labor to improve the wire clamping on the Braun wheelchair lift. The new clamping procedure is defined in MCI Service Bulletin 347.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The new clamping procedure is defined in Service Bulletin 347 and involves the addition of P-clips to secure individual lines away from moving parts on the wheelchair lift.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

MCI corrected this problem in production beginning with unit number 65650. MCI anticipates that the production and field recall remedies will be identical.

VI. Identify the Recall Schedule

9. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please identify any foreseeable problems with implementing the recall.

MCI anticipates sending notifications to customers within one week after receiving approval by NHTSA of MCI's draft customer notification.

VII. Furnish Recall Communications

10. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

MCI's proposed customer notification letter and Service Bulletin 347 are attached.

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.