

PIERCE MANUFACTURING, INC.

AN OSHKOSH CORPORATION COMPANY · ISO 9001 CERTIFIED

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June 14, 2011

Jennifer Timian (NVS-215)
Chief of Recall Management
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington DC 20590

AMENDED

Vehicle Recall: **Accelerator Pedal**
Pierce Recall Number – 74B215

Dear Ms. Timian:

Pierce has decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below. We therefore furnish notification to the National Highway Traffic Safety Administration, in accordance with 49 CFR Part 573, Defect and Noncompliance Reports.

1. Name of Manufacturer and Corporate contact:

Pierce Manufacturing Inc.
David Archer, Director of Engineering
Phone: 920 832-3513
FAX: 920 832-3526
E-Mail: darcher@piercemfg.com

2. Identification of Vehicle Classification:

Make: Pierce
Model Years Involved: Dash & Lance: 1998 - 2008
Enforcer: 2000 - 2008
ArrowXT: 2003 - 2008
Models: ArrowXT, Dash, Lance, Enforcer
Mfg. Date Beginning: 05/30/1998
Mfg. Date Ending: 05/12/2008

3. Number of Potentially Affected Vehicles: 5335 total; 5291 US & 44 Canada

4. Estimated Percentage of Vehicles Containing the Defect: 100 %

5. Description of the Defect: Certain Pierce fire apparatus may be equipped with a suspended electronic accelerator pedal. After repeated use with excessive force, the accelerator pedal arm may bend and cause the foot pedal to move closer to the floor. If the pedal arm bends far enough, the foot pedal may contact the cab floor without warning and stick in the full throttle position. If an accelerator pedal stick occurs, the operator may lose control of the vehicle and a crash may occur.

6. Chronology of Principal Events:

November 8, 2005: Milwaukee Fire Department reported accelerator pedal sticks on Pierce Dash job number 14360, MY 2003 and job number 15932, MY 2004. No reported injuries.

November 2005 – March 2006:

Pierce conducted an exhaustive study of the accelerator pedal stick issue with the Milwaukee Fire Department. Additional fire apparatus from other Pierce fire truck owners were also inspected. In addition R&D testing was done to understand the mode of failure. Williams Controls, the accelerator pedal manufacturer, was contacted to seek assistance for the bent pedal arm issue.

The joint conclusion of Williams Controls and Pierce was the accelerator pedal arm was being bent as a result of excessive abuse. Pierce recognized that owners with bent pedal arms would need an accelerator pedal upgrade kit. Williams Controls developed a fabricated pedal arm that was able to withstand the abusive forces generated by some fire departments.

The Pierce safety committee agreed the bent pedal arms were caused by aggressive abuse that was beyond the reasonable expectation for the accelerator pedal.

March 8, 2011: Tucson Fire Department reported an accelerator pedal stick on a Pierce 1996 Enforcer, job number 17411-05. No reported injuries.

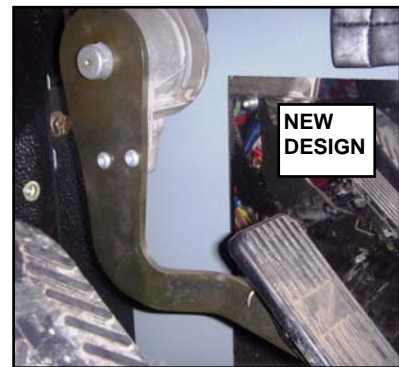
April 1, 2011: Detroit Fire Department reported accelerator pedal sticks on Pierce Dash job number 13878, MY 2002 and job number 15923, MY 2005. No reported injuries.

April 20, 2011: As a result of recent accelerator pedal stick occurrences, the Pierce safety committee agreed to issue a NHTSA Part 573 Defect Report.



7. Corrective Action: Remove the existing accelerator arm and install a redesigned fabricated pedal arm. The fabricated pedal arm is a direct replacement for the existing round bar pedal arm.

Production vehicles were upgraded to the fabricated pedal arm design on vehicles shipped on or about May 2008. The production fabricated pedal arm design is identical to the recall remedy.



8. Representative Notices: Notices have been sent.

Sincerely,
Pierce Manufacturing, Inc.

A handwritten signature in black ink, appearing to read "David Archer".

David Archer
Director of Engineering