

RECEIVED

By Recall Management Division at 1:18 pm, Jul 22, 2011

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

July 21, 2011

11V-368
(3 pages)Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington D.C. 20590Subject: Noncompliance Information Report (Initial)
Navistar Campaign 11513

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 on behalf of IC Bus, LLC, a wholly owned subsidiary.

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

- Vehicle Type / Make / Model / Model Year Involved:
 - School Bus / IC Bus / CE / 2011, 2012
 - School Bus / IC Bus / RE / 2011, 2012
- Vehicle Manufacturing Dates:
 - 10/8/09 thru 4/14/2011
- Other Identification Necessary to Describe Vehicles:
 - With passenger seat feature code 48USV, 48SRA, or 48SWA.

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

- This report relates to vehicle level assembly controlled by IC Bus.

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

Type	Make	Model	Number of Suspect Vehicles		
			United States	Canada	Export
School Bus	IC Bus	CE	195	0	0
School Bus	IC Bus	RE	145	0	0

(5) PERCENTAGE OF VEHICLES ESTIMATED TO BE NONCOMPLIANT [Part 573.6 (c)(4)]

- It is estimated that all (100%) of the vehicles in suspect population are noncompliant.

(6) DESCRIPTION OF NONCOMPLIANCE [Part 573.6 (c)(5)]

- The suspect buses may have been built without, or with incorrectly installed, floor reinforcements that are needed for the bus to comply with the seat back rear force and displacement requirements of FMVSS 222 S5.1.4.
- Noncompliance to FMVSS 222 S5.1.4 may increase the passenger's risk of personal injury or death in the event of a crash.

(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)]

- 10/15/10 – Dealer reports that some units with build dates of 9/1/10 and after may have been built without the required floor channel reinforcements.
- 11/18/10 – Engineering ran seat pull test on floor section without reinforcement and determined that the installation could be suspect.
- 12/7/10 – Initiated a vehicle search to define the scope of the issue. Field inspections were initiated.
- 1/13/11 – Engineering and field service personnel met to consider root cause.
- 2/28/11 - Engineering met to further define scope, confirm root cause and corrective actions needed.
- 3/30/11 – Developed possible containment action concept which involved the addition of a brace between the seat riser and the bottom of the seat rail.
- 4/5/11 – Field inspections were concluded and identified units that also had the floor reinforcement improperly installed inside the pass through luggage box.
- 4/11/11 – Engineering team met and determined that some units with pass through luggage boxes should also be included in suspect population. Must revise scope to include these vehicles.
- 4/14/11 – Initiated containment of the issue at the Tulsa bus plant with the addition of the proper reinforcements.
- 4/25/11 – Performed seat pull test with possible containment action with the addition of the bracket to ensure it would exceed FMVSS 222 pull test requirements.

- 6/3/11 – Engineering met to verify root cause and ensure containment measures would correct the issue.
- 7/6/11 – Finalized suspect vehicle population.
- 7/13/11 – Navistar declares a non compliance recall.

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

- The remedy will require addition of a bracket attached to the seat riser that fits under the seat rail.

(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)]

- 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 9/16/11.

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

- 11513

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