

**Mack Trucks, Inc.**

July 19, 2011

Subject: New Safety Recall (SC0355, Clutch Pedal)**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 Trucks")
7900 National Service Rd.
Greensboro, NC 27409

573.6(c)(2)

Certain vehicles manufactured from July 12, 2010 through July 23, 2010 or repaired under Mack Trucks Service Program PI0700 during the period of July 12, 2010 through January 14, 2011.

The selection of vehicles was based on the suspect part number and dates that the suspect part may have been used to manufacture or repair a vehicle.

Affected Models and Model Years:

2010 -2011: CHU, CXU, GU models.

Component Manufacturer:

Pulverman
1170 Lower Demunds Rd.
Dallas, PA 18612



573.6(c)(3)

There are approximately six hundred sixty two vehicles in total affected by the recall, of which there are four hundred thirty-six (436) that reside in the United States.

573.6(c)(4)

The percentage of the vehicles containing the defect is unknown.

573.6(c)(5)

During the week of July 12, 2010, interference occurred in a weld fixture which caused an orientation change of the weld path resulting in the misalignment of the welding torch at the point of the weld. These non conforming parts were identified and believed by the supplier, Pulverman, to be quarantined; however, these parts were subsequently shipped to Mack Trucks.

The concern to motor vehicle safety is that if the weld fails, the pedal's shaft may work its way loose and potentially cause the clutch pedal to fall to the floor, which may result in a vehicle crash.

573.6 (c)(6)

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

- | | |
|---------|--|
| 1/14/11 | Dealer reports broken weld on clutch pedal |
| 1/21/11 | Investigation opened |
| 3/29/11 | Meeting held to discuss findings |
| 4/26/11 | Investigation complete, scope identified |
| 4/26/11 | Information submitted to Mack Trucks Product Safety Committee for recommendation |
| 4/29/11 | Pulverman meets with Mack Trucks to discuss mater |
| 5/4/11 | Pulverman supplies additional information to Mack Trucks. Mack Trucks re-opens investigation to consider the new information supplied by Pulverman |
| 7/8/11 | Recommendation sent to Mack Trucks' CEO for decision |
| 7/11/11 | Mack Trucks makes determination of a safety related defect |
| 7/19/11 | NHTSA notified that Mack Trucks would initiate a voluntary safety recall |

There is one field report dated 1/14/11 associated with this recall.



573.6(c)(7)

Not applicable

573.6(c)(8)

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

The recall repair will consist of replacing the clutch pedal shaft on suspect vehicles.

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 Trucks, is **SC0355**.

A Safety Recall Alert will be released to dealers on or before July 22, 2011, which informs the dealers of the recall. Owner letters are scheduled to be mailed on or before September 5, 2011.

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
Director, Regulatory Affairs
Mack Trucks, Inc.
7900 National Service Rd.
Greensboro, NC 27409
timothy.lafon@volvo.com
(336) 393-2233