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P: 260-461-1890
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July 21, 2011

11V-375
(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 11514

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 / BE / 2008 thru 2012
 - School Bus / IC Bus / CE / 2008 thru 2012
 - School Bus / IC Bus / FE / 2008 thru 2012
- Vehicle Manufacturing Dates:
 - 11/1/06 thru 5/2/11
- Other Identification Necessary to Describe Vehicles:
 - With rear exit door reflective tape feature code 47NWD.

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

- This report relates to a 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 | BE | 2 | 0 | 0 |
| School Bus | IC Bus | CE | 56 | 0 | 0 |
| School Bus | IC Bus | FE | 12 | 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 a complete outline of the rear exit door with reflective tape as required per FMVSS 217 S5.5.3(c), which states that, “each opening for a required emergency exit shall be outlined around its outside perimeter with a retro-reflective tape with a minimum width of 2.5 centimeters...”. Inspections determined that the tape was installed on the top and bottom of the door, but not on either side of the door.
- Noncompliance to FMVSS 217 S5.5.3(c) may reduce conspicuity of the rear exit door, reducing the ability of emergency personnel to identify and gain access to the rear exit during an emergency, possibly increasing the passenger’s risk of personal injury or death during an emergency.

(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)]

- 6/1/11 – IC Bus engineering determined that bus body option feature code 47NWD did not provide for adequate reflective tape coverage around the rear emergency door as required by FMVSS 217. Containment action was taken to add the appropriate reflective tape as needed at the assembly plant.
- 6/13/11 – An investigation was conducted by engineering to determine the scope of the issue. It was determined that the bus body option should not have been set up as an orderable feature for U.S. school buses.
- 6/24/11 - Field service completed field inspections and verified that units built with bus body code 47NWD did not provide the proper reflective tape coverage per requirements for US school buses. Reflective tape was not applied to each side of the rear emergency door as required by the regulation.
- 7/6/11 – IC Bus completed a vehicle search to determine the suspect population.
- 7/13/11 – Navistar declares a non compliance recall.

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

- The remedy will involve the inspection and, if necessary, the installation of the reflective tape on both sides of the rear emergency door exits.

(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)]

- It is estimated that the owner notification letter will be mailed by 8/26/11.

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

- 11514

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