



**SPARTAN MOTORS, INC.**

11V-412  
(3 pages) Amendment

1541 Reynolds Road Charlotte, MI 48813 USA

[www.spartanmotors.com](http://www.spartanmotors.com)

p 517.543.6400

f 517.543.5403

September 3, 2013

Ms. Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attention: Recall Management Division  
1200 New Jersey Avenue S.E.  
Washington, DC 20590

Subject: Spartan Motors Chassis, Inc. - Non-Compliance Report (11V-412)

Dear Ms. Lewis:

On July 29, 2011, pursuant to Part 573 of Title 49 of the Code of Federal Regulations Spartan Motor Chassis, Inc. (Spartan Chassis) submitted a non-compliance report (11V-412). Further, Spartan Chassis petitioned the NHTSA to consider the non-compliance as inconsequential to motor vehicle safety for the affected 313 vehicles.

However, on August 12, 2013 Spartan Chassis was notified that NHTSA has denied the petition. Therefore, the amended non-compliance report is being submitted on behalf of Spartan Chassis by Spartan Motors, Inc.

Please contact me with any questions as it relates to this matter.

Best Regards,

Wesley D. Chestnut  
Lead, Compliance



Spartan Motors, Inc.  
1541 Reynolds Road  
Charlotte, MI 48813  
P: 517.543.6400 ext. 3275  
M: 517.231.0712  
E: [Wes.Chestnut@spartanmotors.com](mailto:Wes.Chestnut@spartanmotors.com)  
W: [www.spartanmotors.com](http://www.spartanmotors.com)



**Non-Compliance Report  
11018 (11V412)**

**573.6(c)(1):** Spartan Motors Chassis, Inc.  
1541 Reynolds Road  
Charlotte, MI 48813

**573.6(c)(2):** Motor home chassis affected by this recall are equipped with air gauges supplied by Ametek. Other product models are equipped with gauges from a different supplier

Ametek  
287 27 Rd  
Grand Junction, CO 81503

<b>Make</b>	<i>Spartan Motors Chassis, Inc.</i>
<b>Models</b>	MM, K2, K3 and SU
<b>Model Years</b>	2011 and 2012
<b>Vehicle Type</b>	Motor home chassis
<b>Weight Range (GVWR)</b>	31,000 lbs - 54,000 lbs
<b>VDM Range</b>	1/28/2011 through 6/28/2011

Table 1

**573.6(c)(3)** The total number of vehicles potentially containing the defect is shown in Table 2.

<b>Model</b>	<b>Model Year</b>	<b>Number Involved</b>
K2	2011	2
K3	2011	11
MM	2011	212
SU	2011	3
K2	2012	21
K3	2012	14
MM	2012	49
<b>Total</b>		313

Table 2

**573.6(c)(4)** 100% of the vehicles produced between the dates of manufacturing shown in **Table 2** contain the non-compliant gauges.



- 573.6(c)(5)** Air gauge accuracy does not meet the requirements identified in FMVSS 121 – Air Brake Systems §5.1.4. The inaccurate air gauge may give false indications of the actual air pressure in each air system. In a condition where constant braking may be necessary, the air systems may deplete sooner than expected. The could cause the application of the spring brake without warning and may result in a vehicle crash.
- 573.6(c)(6)** **08JUN11** - Ametek notifies Spartan Motors Chassis, Inc. of incorrect value used in the calculation for the sweep angle on the air gauges.
- 16JUN11** - Spartan Motors Chassis, Inc. approves changes in the gauge after corrective actions were implemented by Ametek.
- 22JUN11** - Compliance reviews request to seek exemption with Market Line lead
- 30JUN11** - Compliance gains consensus from Corrective Action Review Team to seek exemption from submitting a recall and performing field remedy.
- 14JUL11** - Compliance reviews draft petition with Market Line Lead then submits to on staff counsel for review. New gauges released for production
- 29JUL11** - Petition submitted to NHTSA
- 12AUG13** – Spartan Motors, Inc. receives notice the petition was denied.
- 573.6(c)(8)** Spartan Motors Chassis, Inc. will supply gauges that comply with the applicable sections of FMVSS 121 – Air Brake Systems. This will be done at no charge. Customer notification is expected to begin the end of September.