

RECEIVED

By Recall Management Division at 12:02 pm, Aug 25, 2011

**Safety Defect and Noncompliance Report Guide for Vehicles
Part 573 Defect and Noncompliance Responsibility and Reports**

On August 15, 2011 Gillig LLC decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: August 25, 2011

Furnish the manufacturer's identification code for this recall (if applicable): N/A

1) Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Gillig LLC
25800 Clawiter Road
Hayward, Ca 94545

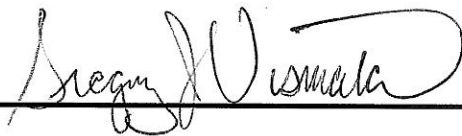
Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Gregory J Vismara
Vice President Engineering
Telephone number: 510-264-5037 **Fax Number:** 510-264-3897

Name and Title of Person who prepared this report:

Gregory J Vismara
Vice President Engineering

Signed:

 8/25/11

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall:

Make(s): Gillig LLC **Model Years Involved:** 2011 **Model(s):** Lowfloor

Production Dates: Beginning: June 13, 2011 **Ending:** August 12, 2011

VIN Range: Beginning: 92113 **Ending:** 180482 (not sequential)

Vehicle Type: Transit Bus **Body style:** Lowfloor

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Effected Vehicles are equipped with TRW TC34023 Steering Columns with date codes starting 157_1_11 and ending 228_1_11.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. 97%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
Lowfloor	2011	265
Lowfloor	Aftermarket parts	26

Total Number Potentially Affected by the Recall: 291

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100%

Identify and describe how the recall population was determined – in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

TRW identified starting and ending manufacturing dates for steering columns with the non-conforming parts. Gillig identified dates these parts were received at the Gillig production facility. Serial numbers for all buses shipped before non-conforming parts were purged from the Gillig facility were identified by a review of the production schedule.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or non-compliance. Illustrations should be provided as appropriate.

Tilt lock teeth on the support bracket were not made to print.

Describe the causes(s) of the defect or noncompliance condition.

The support bracket was not manufactured to print.

Describe the consequence(s) of the defect of noncompliance condition.

Non-conformance of tooth profile and spacing of the tilt lock teeth on the support bracket may prevent the tilt lock bar from fully engaging allowing the steering column to become disengaged from the driver set tilt location and move upward until it locks into another tilt position.

Identify any warning which can (a) precede or (b) occur.

None.

If the defect of noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

TRW Automotive
800 Heath St
Lafayette, IN 47902

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

David Hobson, Warranty Manager

IV. Provide the Chronology in Determining the Defect/Noncompliance

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

July 6, 2011 Gillig was informed that the delivery driver for bus 178821, while driving on the freeway, had experienced the steering column disengage from the full down tilt position and move to the upper tilt position. The column was removed from the vehicle

and returned to TRW for inspection. We have received no other reports of this same issue occurring on any other bus.

August 15, 2011 Gillig was informed by TRW that locking teeth on the support brackets that were used in some TC34023 columns did not conform to manufacturing print callouts.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

N/A

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing and owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part.

Refer to proposed Gillig Campaign Letter's attached. There is one letter for production buses and a second for parts sold through Gillig's aftermarket parts group.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

Steering columns will be replaced in whole. The replacement columns have the support bracket manufactured to print.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The replacement steering columns will have a supplier date code of 229 1 11 or later.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The production remedy is identical to the recall remedy and was implemented in production on buses that began shipping to customers August 18, 2011.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Gillig has identified all vehicle owners that have columns that have been identified for recall. The campaign letters attached will be sent to these owners immediately following

NHTSA approval. An inventory of columns to meet customer demand is currently being produced.

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.