



**MOTOR COACH
INDUSTRIES**

RECEIVED

By Recall Management Division at 12:52 pm, Oct 28, 2011

Timothy J. Nalepka
Senior Vice President & General Counsel

Direct Line: (847) 285-2085
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October 28, 2011

11V-524
(7 Pages)

BY EMAIL

Ms. Delia Lopez
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS – 215)
1200 New Jersey Avenue, SE.
Washington, DC 20590

Re: **AMENDED PART 573 NOTICE RE MCI COACHES WITH MERITOR WABCO
ESC MODULES (11E-039)**

Dear Ms. Lopez:

Per our discussion this morning, I have enclosed Motor Coach Industries, Inc.'s Amended Part 573 Defect and Noncompliance Report. The only change made to the Part 573 report submitted last week was on page two, in the VIN Range table, in the Model column: the first reference in the original report to "D4505" should have been "D4005".

I will forward MCI's proposed customer notification letter, draft Service Bulletin 371, and sample envelope and mailing label as soon as they are completed.

Please confirm receipt of this notice and provide NHTSA's reference number. Thanks for your assistance with this matter.

Sincerely,
MOTOR COACH INDUSTRIES, INC.

By: Timothy J. Nalepka
Senior Vice President &
General Counsel

Enclosure

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report

On October 11, 2011, Motor Coach Industries, Inc. 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 Reports.

Date this report was prepared: **October 21, 2011 AMENDED October 28, 2011**

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

MCI Service Bulletin 371

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.

**Motor Coach Industries, Inc.
1700 E. Golf Road
Suite 300
Schaumburg, IL 60173**

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

Jim Macdonald, Executive Director, Engineering

Telephone Number: (204) 287-4949 Fax No.: (204) 478-2877

Name and Title of Person who prepared this report.

**Timothy J. Nalepka
Senior Vice President, General Counsel & Secretary**

Signed: _____



I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Certain 2007 - 2012 MCI D model coaches, and certain 2003 and 2007 – 2012 MCI E and J model coaches equipped with a Meritor WABCO Vehicle Control Systems (“Meritor WABCO”) pneumatic Electronic Stability Control (“ESC”) system containing an ESC module with Meritor WABCO part number 446-065-027-0, as described more specifically in the attached Meritor WABCO Defect Information Report dated September 30, 2011.

Make(s): MCI

Model Years and Models Involved: 2003, and 2007 to 2012 E and J models
2007 to 2012 D models

Production Dates:

Beginning: October 2002 **Ending:** October 2011 For E and J models
Beginning: February 2007 **Ending:** October 2011 For D models

VIN Range:

Model	VIN'S
D4000/D4005/D4500/D4505/D4000ISTV	57830,58581,58890,58907, 58980 to 59269
	59271 to 59306, 59308, 59318 to 59323, 59325
	59335 to 59615, 59625 to 59938
E and J models	61996, 64618, 64918, 64919, 64948 to 64950,
	64953 to 64964, 64966, 64968, 64970, 64972, 64974
	64976, 64978 to 64988, 64990 to 65004, 65006
	65011, 65013 to 65082, 65086 to 65098, 65106
	65108, 65110, 65112 to 65118, 65120, 65122
	65124 to 65147, 65149, 65151 to 65170, 65172, 65174
	65176, 65178, 62180, 65182, 65184, 65186 to 65188
	65190 to 65202, 65204 to 65334, 65336, 65338
	65340, 65342 to 65384, 65386, 65388 to 65452
	65455 to 66024

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

The recalled vehicles are the 2008 - 2011 MCI D, E, and J model motor coaches equipped with a Meritor WABCO pneumatic ESC system containing an ESC module with Meritor WABCO part number 446-065-027-0, as described more specifically in the attached Meritor WABCO Defect Information Report dated September 30, 2011. Other vehicles do not have the recalled ESC module.

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. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

The recall population is .3% of the total E and J coach production for model year 2003; 100% of the E and J coach production for model years 2008 – 2012; .15% of the total D coach production for model year 2007; .14% of the total D coach production for model year 2008; 40% of the total D coach production for model year 2009; and 100% of the total D coach production for model years 2010 - 2012.

II. Identify the Recall Population

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

Total Number Potentially Affected by the Recall: **1962**

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

100% of the vehicles identified in II.3

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:

MCI determined the vehicle recall population by identifying the motor coaches containing any of the Meritor WABCO ESC system modules referenced in the attached Meritor WABCO Defect Information Report dated September 30, 2011.

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 noncompliance. Illustrations should be provided as appropriate.

Meritor WABCO reports that under certain unique road and driving conditions involving tight, successive, highly banked curves in opposite directions, the vehicle body roll and road inclination characteristics may adversely affect the slip angle calculation by the ESC module. This may cause the ESC to perceive an oversteering situation and therefore apply the front axle outer wheel service brake until the vehicle is perceived to be stable by the ESC. This unnecessary brake intervention may pull the vehicle out of the curve, requiring the driver to counter steer to keep the vehicle on its intended path. Please see the attached Meritor WABCO Defect Information Report dated September 30, 2011 for additional information.

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

Meritor WABCO reports that under certain driving conditions an error in the calculation of the slip angle by the ESC module may cause an unintended brake application. Please see the attached Meritor WABCO Defect Information Report dated September 30, 2011 for additional information.

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

Meritor WABCO reports that if the unintended brake application occurs and the driver is slow to react, the vehicle may deviate from its intended path. Please see the attached Meritor WABCO Defect Information Report dated September 30, 2011 for additional information.

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

MCI is not aware of any such warnings. Meritor WABCO reports that the two reported incidents have occurred on tight, S-type curves that are highly banked above 6 degrees. Meritor WABCO further reports that the faster the vehicle is driven on these unique road conditions, the tighter the curves, and the higher the bank, the more likely the occurrence of unnecessary oversteer brake activation by the ESC. Please see the attached Meritor WABCO Defect Information Report dated September 30, 2011 for additional information.

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

**Meritor WABCO Vehicle Control Systems
2135 West Maple Road
Troy, Michigan 48084-7186**

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

**Patrick Kealy
Sr. Mgr.-Quality Systems**

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principal 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.

Please see the attached Meritor WABCO Defect Information Report dated September 30, 2011 for this information.

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

Meritor WABCO reports that it will replace the currently installed ESC module with a new version containing updated software capable of resolving the issue described. Following replacement of the ESC module, the ESC system will require calibration, and certain ESC systems may require replacement of the ABS ECU as well.

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

Meritor WABCO reports that the replacement ESC module will prevent the unintended ESC activation from occurring. Please see the attached Meritor WABCO Defect Information Report dated September 30, 2011 for additional information.

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.

Please see the attached Meritor WABCO Defect Information Report dated September 30, 2011 for additional information.

VI. Identify the Recall Schedule

9. 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.

MCI anticipates sending notifications to customers within one week after receiving approval by NHTSA of MCI's draft customer notification.

VII. Furnish Recall Communications

10. 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) for review prior to mailing.*

MCI will submit its proposed customer notification letter and Service Bulletin under separate cover.

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.