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R. L. Van Laar  
Compliance Manager

February 15, 2012

Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington D.C. 20590

Subject: Defect Information Report (Initial)  
Navistar Campaign 12505  
CE White Campaign 11 E -026

Dear Associate Administrator:

This defect [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 / 2011 and 2012
  - School Bus / IC Bus / CE / 2011 and 2012
  - School Bus / IC Bus / RE / 2012
- Vehicle Manufacturing Dates:
  - 4/8/2010 thru 7/1/2011
- Other Identification Necessary to Describe Vehicles:
  - Seats produced by the CE White Manufacturing Company with the self latching cushion option

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

- This report relates only to a component supplied by CE White Manufacturing Co. Contact information is:

Todd Moyer  
Director of Engineering  
The CE White Company  
417 North Kibler St.  
New Washington, Ohio 44854  
(419) 492-5324

*(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	25	0	0
School Bus	IC Bus	CE	616	0	0
School Bus	IC Bus	RE	36	0	0

*(5) PERCENTAGE OF VEHICLES ESTIMATED TO CONTAIN THE DEFECT [Part 573.6 (c)(4)]*

- It is estimated that all (100%) of the vehicles in suspect population could have the defect.

*(6) DESCRIPTION OF DEFECT [Part 573.6 (c)(5)]*

- The C.E. White Company has identified a potential defect issue related to the seat mechanism on school bus seats. Specifically, the seat cushion does not lock or latch per the requirement in FMVSS 571.222 5.1.5(a). This requirement indicates that when a 48.4 pound mass is placed in the center of the cushion the “self” latch mechanism must latch.
- There are no documented failures, but to ensure compliance, the C. E. White Company is suggesting maintenance to the mechanism to create a better safety factor.

*(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)]*

- 11/28/11 – CE White Engineering sent initial notice to IC bus referencing CE White’s defect report 11E-026 stating that the latch may not meet the latch engagement pressure requirement stated in FMVSS 222 paragraph 5.1.5.a.
- 12/6/11 – IC Bus Engineering contacted CE White to determine the scope of the issue.
- 12/14/11 – CE White provided ship dates of seats with suspect latches to IC Bus.
- 1/11/12 – IC Bus met with CE White to define containment and determine root cause.
- 1/23/12 – IC Bus performed a vehicle search based on the suspect seats and finalized the population of suspect buses.
- 2/8/2012 – Navistar declares a safety recall.

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

- The remedy will involve notification to dealers and customers to lubricate the seat latches on buses built April 8, 2010 thru July 1, 2011.

*(9) PLAN FOR REIMBURSEMENT [Part 573.6 (c)(8)(i)]*

- A plan for reimbursement of pre-notification remedies is not needed as all the vehicles are within their original warranty period. Should any vehicle no longer be within their original warranty period, 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)]*

- The schedule for recall notification is based on the availability of repair parts which cannot be determined at this time. However, a plan to mail an interim owner notification letter may be developed if the final remedy will not be available before 4/15/2012.

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

- 12505

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.

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