

**RECEIVED**

By Recall Management Division at 9:17 am, May 16, 2012

12V-214  
(3 Pages)

**PACCAR** Inc  
Law Department

May 15, 2012

SENT VIA FACSIMILE (202) 366-7882 & E-MAIL

Jennifer Timian  
Chief, Recall Management Division  
Office of Defects Investigation (NEF-111)  
Safety Assurance  
National Highway Traffic Safety Administration  
1200 New Jersey Ave SE  
Washington, D.C. 20590

Re: **Kenworth T680 and Peterbilt 579 Trailer Brake Timing**  
**Kenworth Recall No.: 12KWB**  
**Peterbilt Recall No.: 0512-A**

Dear Ms. Timian:

PACCAR Inc is furnishing notice to NHTSA in accordance with 49 CFR Part 573 "Defect and Noncompliance Reports" of its intention to voluntarily recall the chassis listed below. This recall involves vehicles manufactured by both the Kenworth Truck Company and Peterbilt Motors Company divisions of PACCAR Inc.

Manufacturer - 573.6(c)(1)  
Kenworth Truck Company  
10630 NE 38th Pl.  
Kirkland, WA 98033

Peterbilt Motors Company  
1700 Woodbrook Street  
Denton, Texas 76205

Identification of Affected Vehicles - 573.6(c)(2)

The affected Kenworth models consist of certain 2013 model year T680 vehicles equipped with fifteen (15) foot coiled trailer lines.

The affected Peterbilt population consists of certain 2013 model year 579 vehicles equipped with fifteen (15) foot coiled trailer lines.

Population of Affected Vehicles - 573.6(c)(3)

The four (4) affected Kenworth vehicles were manufactured between January 18, 2012 and April 19, 2012.

The three (3) affected Peterbilt vehicles were manufactured on March 29, 2012.

All of the affected vehicles are pre-production vehicles being driven by customers in interstate commerce on a test basis.

Number of Vehicles Known to Contain Non-compliance - 573.6(c)(4)

All of the affected trucks contain the non-compliance defect described below.

Description of the Noncompliance - 573.6(c)(5)

The affected vehicles slightly exceed the brake timing test requirements of FMVSS 121 for trailer circuits when 15 foot coiled trailer lines are used. Trailer brake actuation timing was measured at 0.369 seconds. FMVSS 121 requires a maximum trailer brake actuation timing of 0.35 seconds.

Although Kenworth and Peterbilt believe the noncompliance to be inconsequential, due to the limited number of affected vehicles, Kenworth and Peterbilt have elected to institute a recall rather than petition NHTSA for a determination of inconsequential noncompliance.

Chronology of Events Leading to Recall – 573.6(c)(6)

On May 4, 2012, the divisions' test engineers conducted a brake timing test for the T680 and 579 brake systems. The test appeared to show that the trailer brake actuation timing did not meet FMVSS 121 requirements when 15 foot coiled trailer lines were used. FMVSS 121 Section 5.3.3(b) sets a 0.35 second maximum for the activation pressure to the trailer. Test vehicles with 15 foot coiled trailer lines reached actuation pressure in 0.369 seconds, which was less than 2/100<sup>th</sup> of a second beyond the FMVSS specification. Vehicles tested with 12 foot coiled trailer lines met FMVSS 121 requirements.

An internal investigation was promptly commenced. The testing was validated. On May 11, 2012, the divisions elected to initiate a recall based on the validation of the non-compliance with FMVSS 121. Although the divisions believe the noncompliance of less than 2/100<sup>th</sup> of a second to be inconsequential, the divisions have elected to proceed with this recall rather than seek a determination of inconsequential noncompliance.

Description of Remedy - 573.6(c)(8)

The affected trucks are all pre-production test units which are being tested by select customers. A relay valve will be installed on the affected vehicles, which will bring the trailer brake actuation timing into compliance with FMVSS 121.

Communications Sent to Dealers and Owners – 573.6(c)(10)

Subject to NHTSA approval of the text of the letter, PACCAR anticipates customer letters will be sent within the next 30 to 60 days.

Jennifer Timian  
Chief, NHTSA Recall Management Division  
May 15, 2012  
Page 3

Identification of Recall Schedule - 573.6(c)(12)

The Kenworth number for this campaign is "12KWB". The Peterbilt number for this campaign is "0512-A".

Please let me know if you have any questions or concerns.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Michael K. Walton", with a long horizontal flourish extending to the right.

Michael K. Walton  
Counsel  
PACCAR Inc