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Compliance Manager

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

12V-479  
3 Pages

Subject: Defect Information Report (Initial)  
Navistar Campaign 12526

Dear Associate Administrator:

This defect information report is submitted pursuant to Part 573.6(a).

*(1) MANUFACTURER'S NAME [Part 573.6(c)(1)]*

- Navistar, Inc for its INTERNATIONAL® brand trucks, and also on behalf of IC Bus, LLC, a wholly owned subsidiary; or Workhorse Custom Chassis, a wholly owned subsidiary; or Navistar RV, a wholly owned affiliate.

*(2) IDENTIFICATION OF VEHICLES [Part 573.6(c)(2)]*

- Vehicle Type / Make / Model / Model Year Involved:
  - IC Bus / 3200IM / 2007, 2008, 2009, 2010
- Vehicle Manufacturing Dates:
  - 04/11/06 thru 12/11/09
- Other Identification Necessary to Describe Vehicles:
  - The Vehicle population includes 3200 model Buses and HC model Buses which include parking brake code 04GAY.

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

- This report relates to a defect in a vehicle level assembly controlled by Navistar.

*(4) VEHICLE POPULATION INVOLVED [Part 573.6 (c)(3)]*

Type	Make	Model	Number of Suspect Vehicles		
			United States	Canada	Export
Commercial Bus	IC Bus	3200	381	28	46

(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)]*

- If there is a failure of one of the parking brake system components which leads to the loss of air pressure, it can lead to possible inadvertent partial/total parking brake application while the vehicle is in motion.
- In bus applications, the combination of the following factors may collectively result in an unreasonable risk to motor vehicle safety: high incident rates of parking brake system leaks, potential fire at the driveline parking brake as a result of system leaks, and evacuation and containment concerns relating to multiple passengers.

(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)]*

- 4/20/2012–Navistar receives inquiry questionnaire from NHTSA relating to the potential for inadvertent parking brake application causing the potential for fire on the 2007 through 2010 model year 3200IM model Bus.
- 5/18/2012 – Navistar investigated and responded to NHTSA Inquiry PE12-008 stating that the only reported issues were related to one specific fleet and that those issues could be corrected through proper maintenance and at this time did not believe there was a risk to motor vehicle safety.
- 7/9/2012 – After review of the response, NHTSA met with Navistar to review the facts of the parking brake issue and to discuss next steps. Navistar agrees to open its own investigation to validate the concerns.
- 8/22/2012 – Navistar Reliability, Customer Service, and Product Engineering meet to review all parking brake system components and the potential for air loss or mis-adjusted components contributing to a premature parking brake application.
- 9/10/2012—Navistar determines possible population of suspect vehicles involved.
- 9/17/2012 – Navistar performs additional vehicle inspection to reproduce potential root cause, and confirmed that with current air pressure switch it was possible for the parking brake to start to apply without giving a warning light to the driver.
- 9/25/2012 – Navistar declares a safety recall.

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

- The remedy will involve the update of the parking brake system to include an 85 PSI pressure switch to detect brake lever movement and set a warning light to warn the driver of possible partial application of the parking brake before any application occurs.

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

- 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 11/21/12.

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

- 12526

The undersigned should be contacted for any additional information regarding this recall on (331) 332-1590.

Sincerely,



R. L. Van Laar  
Compliance Manager  
Navistar, Inc.

RV: FI