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P: 331-332-1590
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October 17, 2012

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington D.C. 20590Subject: Noncompliance Information Report (Initial)
Navistar Campaign 12528

Dear Associate Administrator:

This noncompliance 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.

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

- Vehicle Type / Make / Model / Model Year Involved:
 - Commercial Truck / INTERNATIONAL[®] / DuraStar[®] / 2012
 - Commercial Truck / INTERNATIONAL[®] / WorkStar[®] / 2012
- Vehicle Manufacturing Dates:
 - 04/26/2011 thru 12/19/2011
- Other Identification Necessary to Describe Vehicles:
 - Equipped with feature code 16JAJ, SCBA 7 degree passenger seat with secure-all bracket.

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

- This report relates only to a component supplied by H.O. Bostrom. Contact information is:
Matthew Horn
Product Design Engineering Manager
H.O. Bostrom
818 Progress Avenue
Waukesha, WI. 53186
262-542-0222 Ext. 54

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

Type	Make	Model	Number of Suspect Vehicles		
			United States	Canada	Export
Commercial Truck	INTERNATIONAL	DuraStar	3	0	0
Commercial Truck	INTERNATIONAL	WorkStar	2	2	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 front passenger seat does not conform to Federal Motor Vehicle Safety Standard No. 207, S4.2. General Performance Requirements for S4.2 sections (a), (b), (c), and (d) and S4.3.2.1 sections (a) and (b).

When testing compliance to FMVSS 207, Navistar tests to 120% of the required load with a required hold period of 10 seconds, which for the SCBA 7 degree seat should be 2270.4 lbf. Testing achieved the required load, however the hold period was only for 4 seconds before the seat separated at the rails.

- A seat that does not conform to all the requirements of FMVSS 207 may not protect the occupant sufficiently in the event of a crash resulting possible injury or death.

(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)]

- 09/05/2012 – Navistar Engineering receives communication from the Strength and Durability Test Group indicating the SCBA 7 degree passenger seat, modified with the secure-all bracket may not conform to Federal Motor Vehicle Safety Standard No. 207.
- 09/11/2012 – Navistar Engineering communicates noncompliance test results to Product Compliance.
- 09/14/2012 – Navistar Product Compliance and Engineering meet to determine the scope of the issue and suspect population.
- 09/21/2012 – Navistar Product Compliance finalized suspect population.
- 10/10/2012 – Navistar declares a safety recall.

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

- The remedy will involve replacing the seat adjuster rail, anchor plate, and mounting hardware with those of a more robust design that passed the testing requirements.

(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.

(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 12/17/2012.

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

- 12528

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