



BY ELECTRONIC MAIL (RMD.ODI@DOT.GOV)

November 27, 2012

Nancy L. Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.
Washington, DC 20590

Dear Ms. Lewis:

Cummins Inc. has decided that certain engines, as identified below, may contain a safety-related defect when installed in certain school bus applications. The following information is submitted in accordance with the National Highway Traffic Safety Administration's defect reporting regulations, 49 CFR Part 573.6.

1. Product identification and customer channels.

This notice involves certain 2010-2012 Cummins Model ISB6.7 diesel engines manufactured from February 16, 2010 through May 4, 2012 equipped with fan pulley Part Number 3914462 and supplied to Thomas Built Buses, Inc. (a subsidiary of Daimler Trucks North America LLC). The subject fan pulley is part of the accessory drive system on the front of the engine. This system is used to drive such components as the refrigerant compressors, the radiator fan and the engine water pump.

Only the subject engines/fan pulleys in this Thomas Built school bus application are covered by this notice. A total of 7040 units are involved.

2. Estimated extent of defect population.

Cummins will pursue a 100% recall on all products within the affected population, subject to the concurrence of Daimler Truck.

3. Description of defect.

The web of the pulley can fatigue over time, causing the pulley to fail. If this occurs, the fan belt may lose engagement of the water pump, which may lead to an overheat of the cooling system. This may result in exceeding temperature limits, potentially disabling the school bus.

4. Chronology of events.

April 2012: Cummins initiated a detailed investigation into warranty claims for the subject pulley component, including gathering field data and conducting laboratory testing to understand failure modes, application constraints, potential alternatives, and durability/reliability issues.

May 2012: As this investigation was ongoing, Cummins implemented a new fan pulley into production.

July - October 2012: Cummins worked with Thomas Built to understand the matrix of front end arrangements, belt loads, accessories driven, etc. Cummins also initiated data gathering for a Product Safety Hazard Analysis.

November 2012: Product Safety Hazard Analysis completed and, on November 19, 2012, Cummins decided to initiate this campaign to remedy the condition in the subject Thomas Built school buses.

To date, Cummins is not aware of any injuries, fatalities, accidents/crashes related to this condition.

5. Remedy program.

Cummins will notify DTNA/Thomas Built of this defect and the potential safety consequences, and will work with them to identify and notify affected owners. Cummins will install a new fan drive pulley with 4 mm flange thickness, without charge, through Cummins' service network. The new pulleys will be recognizable by part number 5282159. Replacement fan pulleys are currently available.

6. Part 577 notice letter; dealer bulletins.

A draft owner notification letter will be submitted to the agency for review and approval as soon as possible. A representative copy of Cummins' distributor bulletin will be provided within five business days after it is sent.

7. Customer/owner notifications.

Cummins will notify DTNA/Thomas Built on or about November 27, 2012. The timing of owner notification will be determined in consultation with DTNA/Thomas Built. Cummins is prepared to begin notifying owners and providing the necessary repairs promptly upon receipt of DTNA/Thomas Built's customer list.

8. Pre-Notification Remedy Reimbursement.

Pursuant to 49 CFR §577.11(e), Cummins requests that it be exempt from providing notification of a reimbursement plan. Any pre-notification product failure would have been replaced under the manufacturer's limited warranty. Accordingly, no person would be eligible for reimbursement pursuant to §573.13.

* * *

Please advise the undersigned of the recall campaign number assigned by the Office of Defects Investigation to this recall. Cummins' campaign code for this recall will be C1296.

Sincerely yours,

A handwritten signature in cursive script, reading "Steven R. Butler".

Steven R. Butler
Director – Product Safety

Email: steven.r.butler@cummins.com

cc: Mr. Christopher H Grigorian -- Foley & Lardner LLP