



U.S. Department of Transportation  
**National Highway Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

May 29, 2013

Mr. David Archer  
Vice President of Engineering  
Pierce Manufacturing  
P.O. Box 2017  
Appleton, WI 54912-2017

NVS-215KS  
13V-214

**Subject:** Door Handle Spring Stiffness/FMVSS 206

Dear Mr. Archer:

This letter serves to acknowledge Pierce Manufacturing's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**  
PIERCE/DASH CF/2011-2013  
PIERCE/IMPEL/2007-2013  
PIERCE/VELOCITY/2007-2013

**Mfr's Report Date:** May 16, 2013

**NHTSA Campaign Number:** 13V-214

**Components:**  
STRUCTURE:BODY:DOOR

**Potential Number of Units Affected:** 1,965

**Problem Description:**

Pierce Manufacturing Inc. (Pierce) is recalling certain model year 2007-2013 Velocity, Impel, and Dash CF emergency vehicles manufactured June 6, 2007, through May 17, 2013. The springs in the outer door handles are not of sufficient stiffness to prevent inadvertent door opening in certain impacts. Thus, these vehicles fail to conform to the requirements of Federal Motor Vehicle Safety Standard No. 206, "Door Locks and Door Retention Components."

**Consequence:**

In the event of a crash, the weak springs may allow the door to open and possibly fail to contain emergency personnel or equipment, increasing the risk of injury.

**Remedy:**

Pierce will notify owners, and dealers will replace the door handle spring with a stiffer one, free of charge. Owners may contact Pierce at 1-920-832-3000. The manufacturer has not yet provided a notification schedule. Pierce's recall number is 74B242.

**Notes:**

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to [www.safercar.gov](http://www.safercar.gov).

Please be reminded of the following requirements:

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

You are required to provide an estimated date including month, day, and year, when you will send notifications to owners, dealers, and distributors as soon as it becomes available. Please be reminded that it is expected owners will be notified of a safety defect in their vehicles within 60 days of a manufacturer's notification to NHTSA of a safety defect in those vehicles. You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers.

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Kelly Schuler who may be reached by phone at (202) 366-5227, or by email at [kelly.schuler@dot.gov](mailto:kelly.schuler@dot.gov) or through the office email at [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov). We look forward to working with you.

Sincerely,



Jennifer Timian  
Chief, Recall Management Division  
Office of Defects Investigations  
Enforcement