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14V-013
(3 pages)

PACCAR Inc

January 22, 2014

Via e-mail to rmd.odi@dot.gov
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: **IMMI L9 Seat Belt Buckles**
Kenworth Recall No. 14KWC/Peterbilt Recall No. PB114-B

Dear Ms. Timian:

Pursuant to 49 C.F.R. Part 573, PACCAR Inc hereby provides notice to NHTSA of its intention to voluntarily recall the affected population of vehicles identified below. This recall involves vehicles manufactured by the Kenworth Truck Company and Peterbilt Motors Company, both of which are 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 Potentially Noncompliant Vehicles - 573.6(c)(2)(ii)

The vehicles that may potentially be noncompliant are:

- model year 2014 Kenworth Model T660, T680, T700, T800, T880, W900, T440, T470, T370, T270, T170, C500, C550 chassis that were manufactured between August 7, 2013, and October 31, 2013.
- model year 2014 Peterbilt Model 320, 325, 330, 337, 348, 365, 367, 382, 384, 386, 388, 389, and 587 chassis that were manufactured between August 7, 2013, and November 3, 2013.

Component Containing the Noncompliance - 573.6(c)(2)(iv)

Component Name: IMMI Model L9 Seat Belt Buckle

Country of Origin: United States

Manufacturer: Indiana Mills and Manufacturing, Inc. (IMMI)
18881 US 31 North
Westfield, IN 46074

Contact: Lisa Hanson, Director of Corporate Quality

Telephone: (317) 867-8451

Total Number of Potentially Noncompliant Vehicles - 573.6(c)(3)

It is estimated that the recall potentially affects 5276 Kenworth vehicles and 5138 Peterbilt vehicles registered within the United States.

Percentage of Vehicles Estimated to be Noncompliant - 573.6(c)(4)

The percentage of vehicles estimated to be noncompliant is unknown.

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

Indiana Mills and Manufacturing Inc. (IMMI) has determined that certain seat belt assemblies manufactured from August 2, 2013, through October 31, 2013, fail to conform to the requirements of Federal Motor Vehicle Safety Standard (FMVSS) No. 209, "Seat Belt Assemblies." When the button is pressed to release the seat belt, the latch plate can become partially engaged with the buckle, and it may take more effort than specified in the standard to separate the latch plate from the buckle.

Consequence: If the latch plate remains partially engaged after the button is pressed, egress from the vehicle could be hindered which would increase the risk of injury in the event of an emergency.

Chronology of Principal Events that Formed Basis for Recall – 573.6(c)(6)

10/8/2013 Peterbilt discovered a seat belt buckle that would not fully eject the tongue upon initial depression of the buckle button. IMMI was notified and an investigation was initiated.

10/11/2013 IMMI approved QLS sorting at all PACCAR locations. Containment began at all PACCAR facilities.

10/21/2013 Peterbilt Engineering and Plant Quality found that some parts exhibited the sticking issue even though they had successfully passed the containment inspection.

10/22/2013 IMMI developed a revised test to evaluate buckle disengagement function.

10/23/2013 IMMI determined that buckles with lot codes 214-13 through 253-13 should be tested.

10/29/2013 Kenworth requested additional information from IMMI. Specifically, Kenworth asked whether IMMI could duplicate the issue. Kenworth also sought details regarding the state of the pawl under conditions in which the button was

pushed but the tongue failed to release. Peterbilt concurred that this information was necessary.

11/5/2013 In a teleconference, IMMI reported that, under test conditions, it duplicated the non-release situation on two of the 30 suspect parts returned by PACCAR. However, IMMI was unable to duplicate the non-release situation with an individual. IMMI stated it was not aware of any instance in which sticking had occurred in the field.

11/8/2013 Kenworth and Peterbilt continued their investigation. In response to the discovery that the pawl in the buckle may contain a burr that hinders release, and IMMI's representation that the situation improved with time and wear, Kenworth and Peterbilt requested information from IMMI to determine how quickly the burr would wear off. IMMI subsequently concluded that certain seat belt assemblies fail to conform to the requirements of FMVSS 209.

1/16/2014 Kenworth and Peterbilt determined that a recall should be initiated for trucks that may be equipped with noncompliant seat belt buckles.

Description of Remedy - 573.6(c)(8)

Kenworth and Peterbilt will notify owners, and dealers will inspect seat belt buckles for the affected manufacturing date code and provide replacement buckles, free of charge, to purchasers of vehicles containing noncompliant seat belt assemblies.

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

Subject to NHTSA approval, a customer letter will be sent within 30 days.

Identification of Manufacturer's Campaign Number - 573.6(c)(11)

The Kenworth number for this campaign is "14KWC." The Peterbilt number for this campaign is "PB114-B."

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

Very truly yours,

s/Pamela S. Tonglao

Pamela S. Tonglao
Counsel
PACCAR Inc