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PACCAR Inc

March 24, 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: **Noncompliant 16.5 x 7 Front Axle Drum Brakes**
Peterbilt Recall No. 314-D

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 Peterbilt Motors Company, a division of PACCAR Inc.

Manufacturer - 573.6(c)(1)

Peterbilt Motors Company
1700 Woodbrook Street
Denton, TX 76205

Identification of Vehicles Potentially Containing Noncompliance - 573.6(c)(2)(ii)

The vehicles that may potentially contain the noncompliance are model year 2008 through 2013 Peterbilt 365, 367, 388 and 389 chassis that were manufactured between October 6, 2007, and September 23, 2013.

Total Number of Vehicles Potentially Containing Noncompliance - 573.6(c)(3)

It is estimated that the recall potentially affects 474 Peterbilt vehicles registered within the United States.

Percentage of Vehicles Estimated to Contain Noncompliance - 573.6(c)(4)

All of the vehicles are estimated to be noncompliant.

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

Bendix ES-420 brake linings were used with 16.5" x 7" front drum brakes on vehicles equipped with front axles rated between 20,001 and 22,000 lbs GAWR. Because the brakes are not rated for those GAWRs when used with larger SLR (20.5" to 21.5") tires, use of the ES-420 brake lining in this application rendered the vehicles noncompliant with FMVSS 121.

Consequence: Inadequate braking could lengthen stopping distances and increase the risk of a crash.

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

- 10/1/2013 Results of brake drum testing indicated potential issues with rating the 16.5 x 7 ES-420 brake at 22,000 lbs.
- 10/3/2013 Peterbilt requested brake dynamometer test reports from Bendix.
- 10/22/2013 Bendix supplied brake dynamometer test data showing that the 16.5 x 7 brake with ES-420 lining was valid up to 22,000 lbs for tire SLRs less than 20.5". Subsequently, Peterbilt collected vehicle usage data.
- 12/12/2013 Peterbilt met with the PACCAR Technical Center and Bendix to determine if the 16.5 x 7 brake with ES-420 lining could be rated up to 22,000 lbs GAWR with larger SLR tires and, if not, to identify possible solutions for trucks in the field. At this time, the parties believed a review of existing full vehicle testing and the use of simulation tools could indicate that this combination would be compliant for a 22,000 GAWR.
- 2/19/2014 PACCAR Technical Center's evaluation revealed that performance with the ES-420 lining was not adequate, but that adequate results were obtained when the ES-420 lining was replaced with the ES-600 lining on trucks with a 22,000 lb GAWR and tires of SLR between 20.5" and 21.5".
- 3/17/2014 The Peterbilt Safety Committee determined that the use of the ES-420 brake lining in this application resulted in a noncompliance with FMVSS 121.

Description of Remedy - 573.6(c)(8)

Peterbilt will notify owners, and dealers will install new brake 16.5 x 7 brake shoes with ES-600 linings. A note will be added to the chassis file of each affected chassis in Peterbilt's electronic parts catalog (ECAT) indicating the correct replacement front brake shoes.

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

Subject to NHTSA approval, a customer letter will be sent within 60 days.

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

The Peterbilt number for this campaign is "314-D."

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

Very truly yours,

s/Pamela S. Tonglao

Counsel
PACCAR Inc