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(8 pages)



Timothy J. Nalepka
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April 3, 2014

BY EMAIL AND
BY CERTIFIED MAIL

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS – 215)
1200 New Jersey Avenue, SE.
Washington, DC 20590

Re: PART 573 NOTICE RE SEAT TRACK

Dear Sir or Madam:

I have enclosed Motor Coach Industries, Inc.'s ("MCI") Part 573 Defect and Noncompliance Report. MCI will send its proposed customer notification letter, draft Service Bulletin 408, and sample envelope and mailing label shortly under separate cover.

In the interim, please acknowledge receipt of MCI's report and advise NHTSA's docket number for this matter. Thank you.

Sincerely,
MOTOR COACH INDUSTRIES, INC.

By: Timothy J. Nalepka
Senior Vice President &
General Counsel

Enclosure



Motor Coach Industries

200 East Oakton Street | Des Plaines, IL 60018 | 847-285-2000 Phone | 866 624 2622 Toll Free

www.mcicoach.com | www.setra-coaches.com



Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report

On March 20, 2014, Motor Coach Industries, Inc. decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: **April 3, 2014**

Furnish the manufacturer's identification code for this recall (if applicable):

MCI Service Bulletin 408

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

**Motor Coach Industries, Inc.
200 East Oakton Street
Des Plaines, IL 60018**

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

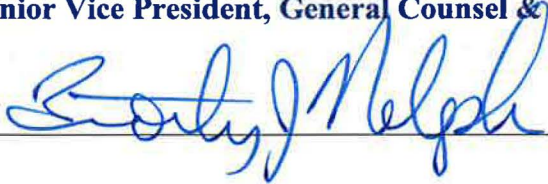
John Paul Pelletier, Director Engineering

Telephone Number: (204) 287-4892 Fax No.: (204) 478-3018

Name and Title of Person who prepared this report.

**Timothy J. Nalepka
Senior Vice President, General Counsel & Secretary**

Signed: _____



I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Certain MCI E and J series motor coaches equipped with passenger seats having a 3-point seatbelt.

Make(s): MCI

Model Years and Models Involved:

MY 2009 to 2014 E and J coaches as shown in the following table. The specific unit list is provided in an attached file.

Model Year	Models		
	E4500	J4500	Total
2009	3	54	57
2010	4	89	93
2011	5	202	207
2012	2	196	198
2013	1	290	291
2014	1	110	111
Total	16	941	957

Production Dates: Beginning: October 2008 Ending: October 2013

VIN Range: (last 5 digits)

65158-65161	65189	65202	65204	65259-65285
65287	65305-65309	65327-65333	65385	65387
65434-65440	65445	65466	65501	65503
65505-65513	65521-65524	65529-65553	65561	65569-65579
65581-65588	65591-65600	65602-65606	65608-65623	65631
65637-65642	65647-65649	65654-65655	65666-65672	65674-65675
65677-65679	65685-65686	65688-65708	65710	65714
65716-65717	65730-65731	65737	65742	65746

65749	65750-65753	65758	65765-65766	65775
65777-65800	65807-65813	65816-65845	65847-65851	65853-65896
65902-65904	65906-65913	65915-65922	65924-65926	65939-65945
65952-65955	65957-65968	65986-65991	65995-66000	66004-66008
66012	66014-66021	66026-66029	66032-66039	66042-66045
66047-66051	66054-66104	66133-66139	66147-66149	66161
66174-66177	66179-66236	66241-66248	66251	66258
66266	66272-66286	66288-66380	66383-66428	66430-66432
66435-66473	66477-66511	66513-66532	66535-66587	66589-66678
66687-66698				

Descriptive information which characterizes /distinguishes the recalled vehicles from those model vehicles not included in the recall:

The recalled vehicles are the MCI E & J series motor coaches that are equipped with passenger seats having 3-point seat belts.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

The recall population is approximately 49% of the total E & J coach population produced during the model years referenced above.

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Total Number Potentially Affected by the Recall: 957

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

MCI assumes that 100% of the vehicles noted in section II.3 contain the defect.

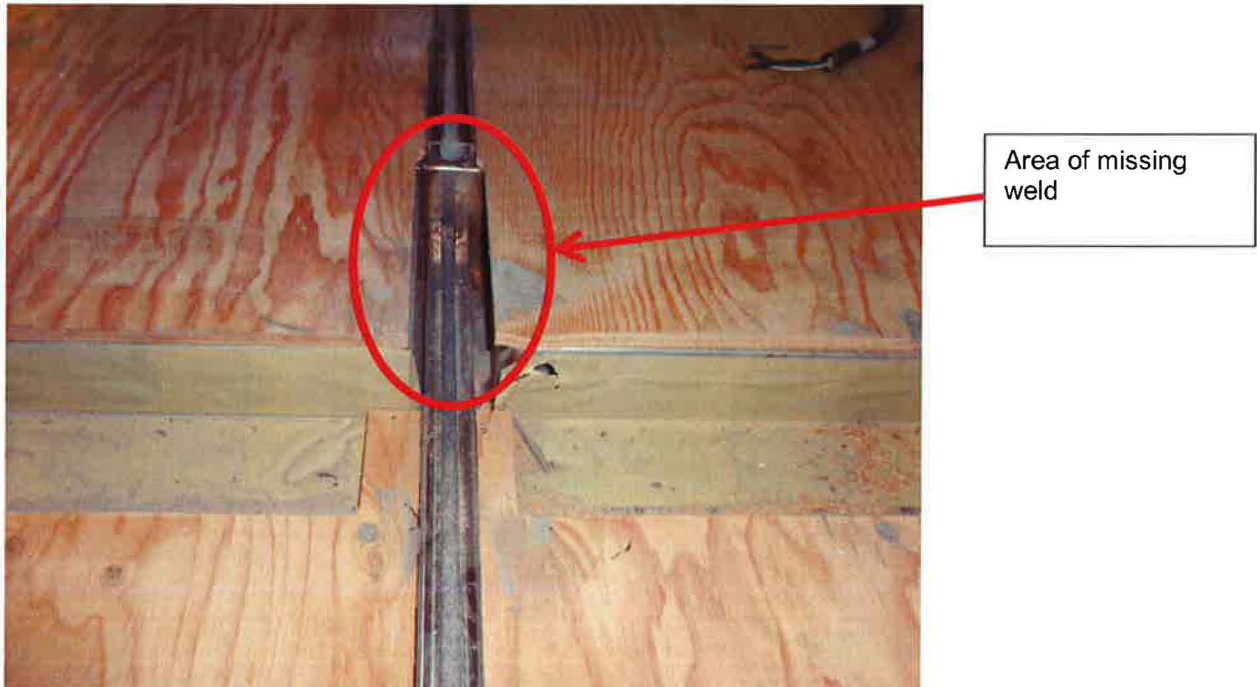
Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

MCI determined that all coaches equipped with passenger seats having 3 point seat belts built from October 2008 to October 2013 potentially contain the defect. Coaches manufactured prior to the recall had a different weld spacing specification on the seat track and were not equipped with passenger seats having 3-point seat belts. Coaches manufactured after the recall period were built to the correct seat track weld spacing specification.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

MCI recently discovered that the seat track mounting of the second row of passenger seats on both sides of the coach was not welded to MCI's specification. Specifically, MCI discovered that a weld was missing at the end of the seat track where the track enters the frame structure. This welding specification was implemented in or about October 8, 2008, with the introduction of passenger seats equipped with 3-point seat belts starting with MCI unit 65158 on MCI's E and J model coaches.



Describe the cause(s) of the defect or noncompliance condition.

As described above, during manufacture of the coaches the weld was not completed to specification with respect to the seat track mounting of the second row of seats on each side of the coach.

Describe the consequence(s) of the defect or noncompliance condition.

In the event of a significant collision or other event imparting high loads to the affected seats, the seat attachment might fail.

Identify any warning which can (a) precede or (b) occur.

None.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

N/A

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principal events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

MCI became aware in October 2013 that the welding on affected coaches had not been made to MCI's specification. MCI corrected the manufacturing process at that time starting with unit 66699. MCI then conducted testing of both seat-belted and non-seat-belted coaches with respect to the amount of load the seat attachment points could withstand. As a result of the testing, and in an abundance of caution, MCI decided to conduct a recall to repair the seat attachment points of the second row of seats on seat-belted coaches made prior to unit 66699.

There have been no reports of accidents, injuries, fatalities, or warranty claims as a result of this defect.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

N/A

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

MCI will provide at no cost to its customers the parts and labor to repair the defect on the affected coaches.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The rework will modify the seat anchorage so that the seat pedestal is fastened through the seat track to the seat pedestal rail, where the seat track is welded. The current configuration has the seat pedestal bolted to the seat track using a T-bolt, and then welding the seat track to the pedestal rail.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

As noted above, the defect condition was corrected in production in October 2013, unit 66699, by ensuring that the subject welding was performed per MCI specification.

The field remedy will bolt the seat pedestal directly to the pedestal rail of the coach structure using bolts and drilling holes through the seat track and the pedestal rail. Welding the rail is not possible in the field due to the seat track being recessed into the floor support channels on each side of the track.

VI. Identify the Recall Schedule

9. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please identify any foreseeable problems with implementing the recall.

MCI anticipates sending notifications to customers within one week after receiving approval by NHTSA of MCI's draft customer notification.

VII. Furnish Recall Communications

10. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

MCI will submit its proposed customer notification letter and draft Service Bulletin 408 under separate cover.

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.