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14V-180
(7 pages)

**National Highway Traffic Safety Administration
Recall Management Division
1200 New Jersey Avenue SE
West Building
Washington DC 20590**

April 6th, 2014

Attention: Cynthia Glass and/or Kelly Schuler

The purpose of this letter is to inform you that Transportation Collaborative has decided that a noncompliance may exist on certain January 10, 2011 to March 10, 2014 model School Buses equipped with 39" Seats (39QS11/39SB11) as manufactured by C.E. White. This noncompliance involves Federal Motor Vehicle Safety Standards 210 and 207.

TransTech Bus is performing its internal investigation into this matter and preparing the population report for NHTSA. This report will be completed no later than April 6th, 2014 and will be forwarded to NHTSA for review.

TransTech Bus will also be preparing a 573 Report, which will be completed by April 6th, 2014 and will be forwarded to NHTSA for review.

This report was e-mailed to NHTSA on April 6th, 2014 to Kelly.Schuler@dot.gov, Cynthia.Glass@dot.gov, and RMD.ODI@dot.gov. In addition, a physical copy has been sent, via UPS. If there are any questions regarding the information I have submitted, please contact me at 845-988-2333.

Sincerely,

Timothy Downey
Standards & Compliance
TransTech Bus a TCI Company



7 LAKE STATION ROAD

WARWICK, NY 10990

PHONE: (845) 988-2333



National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
West Building
Washington DC 20590

April 4, 2014

Attention: Cynthia Glass and/or Kelly Schuler

In accordance with CFR 49 Part 573, Transportation Collaborative Inc has decided that a defect exists which relates to motor vehicle safety.

This report was e-mailed to the National Highway Transportation Safety Administration on April 6, 2014 to Kelly.Schuler@dot.gov , Cynthia.Glass@dot.gov, and RMD.ODI@dot.gov. In addition, a physical copy has been sent, via UPS. If there are any questions regarding the information I have submitted, please contact me at 845-988-2333.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Tim Downey', is written over a light blue grid background.

Timothy Downey
Standards & Compliance
TransTech Bus a TCI Company





PART 573 Defects and Noncompliance Report Revision: A

Report Date: August 5, 2013

I.

Transportation Collaborative Inc has decided to conduct a recall on school buses produced with C.E White 39" Standard Base and 3-Point (39SB11/39QS11) Seating Systems. The defect exists on certain School Buses, equipped with 39" seats and manufactured between January 10, 2011 and March 10, 2014.

Vehicles not involved in the recall:

Trans Tech School Bus models, manufactured between January 10, 2011 and March 10, 2014 that have seating systems of the 39" size (39SB11/39QS11) manufactured by C.E. White with mounting leg dimensions of approximately 28 3/8".

Vehicles involved in the recall:

Trans Tech School Bus models, manufactured between January 10, 2011 and March 10, 2014 that have seating systems of the 39" size (39SB11/39QS11) manufactured by C.E. White with mounting leg dimensions of approximately 23 3/8".

Approximate percentage of the total of vehicles estimated to actually contain the Defect:
97.2%

Vehicle population as of April 4, 2014:

| Body Model | Body Year | Count |
|---------------|-----------|-------|
| AC139SSSA409 | 2011 | 38 |
| DW49139SST | 2011 | 1 |
| DW59159FRLSST | 2011 | 6 |
| DW5139FRL | 2011 | 2 |
| DW6159FRLSST | 2011 | 2 |
| DW6159SST | 2011 | 12 |
| DWF6158FRL | 2011 | 1 |
| RC139DSSP500 | 2011 | 9 |
| SC139DSSA409 | 2011 | 6 |
| SC139DSSA500 | 2011 | 1 |
| SC159DSFP600 | 2011 | 1 |
| SC159DSSA509 | 2011 | 6 |





| | | |
|--------------|------|-----|
| SC159DSSP514 | 2011 | 1 |
| SE138DSSA419 | 2011 | 2 |
| ST4 | 2011 | 3 |
| ST4139 | 2011 | 5 |
| STH4 | 2011 | 6 |
| STH49139 | 2011 | 1 |
| STH4139 | 2011 | 9 |
| SC139DSSA500 | 2012 | 1 |
| AC139SSSA409 | 2012 | 57 |
| AE138SSSA409 | 2012 | 50 |
| CC159DMSA600 | 2012 | 1 |
| DW8195 | 2012 | 2 |
| RC139DSSP500 | 2012 | 6 |
| RC139DSSA500 | 2012 | 33 |
| RC159DMSA600 | 2012 | 1 |
| SC139DSSA409 | 2012 | 27 |
| SC139DSSA500 | 2012 | 20 |
| SC139DSSP500 | 2012 | 1 |
| SC159DSFP600 | 2012 | 3 |
| SC159DSSA509 | 2012 | 20 |
| SC159DSSA600 | 2012 | 27 |
| SC159DSSP600 | 2012 | 4 |
| SE138DSSA419 | 2012 | 2 |
| SE158DSSA600 | 2012 | 1 |
| SE158DSSP600 | 2012 | 1 |
| AC139SSSA400 | 2013 | 1 |
| AC139SSSA409 | 2013 | 197 |
| AE138SSSA409 | 2013 | 65 |
| CC159DMSA600 | 2013 | 2 |
| RC159DSSA600 | 2013 | 10 |
| SC139DSFP500 | 2013 | 9 |
| SC139DSSA409 | 2013 | 11 |
| SC139DSSA500 | 2013 | 40 |
| SC158DSSA600 | 2013 | 1 |
| SC159DSFP509 | 2013 | 1 |
| SC159DSFP600 | 2013 | 43 |
| SC159DSSA509 | 2013 | 21 |
| SC159DSSP600 | 2013 | 44 |
| UNKNOWN | 2013 | 5 |





| | | |
|--------------|------|-----|
| AC139SSSA409 | 2014 | 19 |
| CC159DMSA600 | 2014 | 1 |
| RC139DSSP500 | 2014 | 1 |
| SC139DSSA409 | 2014 | 1 |
| SC159DSFP600 | 2014 | 1 |
| SC159DSSA600 | 2014 | 1 |
| | | 843 |

Identify and describe how the original recall population was determined:

August 5, 2013 -

TransTech Bus engineering department was performing an investigation into a production anomaly that had stuck the seating department. During this issue’s analysis, a request for information was made with the seating manufacturer, as the internally held testing reports did not define all metrics of manufacture/assembly for Trans Tech Bus. Seating manufacturer (herein known as C.E. White) sent testing reports and leg dimensions for approved testing positions. Subsequent analysis of the in place production dimensions occurred and found large discrepancies.

I.

Describe the Defect:

This defect involves Federal Motor Vehicle Safety Standards 571.207 and 571.210 depending on the GVWR of the vehicle. The installation of the 39” seat leg was defined at an inadequate position along the interior of the floor.

Specifically, the Assembly/Production plant installed leg locations for the 39” Quasi-Static and 39” Standard Base seats at improper dimensions. The dimension that was used for this seating position was 23.375” when the dimension to be held was 28.375”. This dimension describes the length between the main mounting leg for the seat and the corresponding mount for the wall track mount.

There is no visual or audible warning which would precede this condition. All seat models indicated in this notice are presumed to contain the defect and must be repaired in accordance with the enclosed Service Repair Procedure, SRP 14VSB for seats with type-1 lap belts, and SRP 14QS for seats with type-2 lap and shoulder belts.

Describe the consequence of the Defect:

The consequence of the defect is failure of FMVSS regulations.





Identify any warning, which can (A) Precede or (B) Occur:

There is no definitive warning that will precede failure of this component. Physical inspection of seat leg dimensions is required for positive confirmation.

II.

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

February 20, 2014 – TransTech Bus, a TCI Company, whilst performing engineering investigation to assembly issues on the production line discovered an issue and attempted to contact component vendor for more information.

February 27, 2014 – TransTech Bus representatives traveled with the newly created “test buck” with current production dimensions to C.E. White for testing. Upon arrival, testing was performed and 39SB11 & 39QS11 seats at the current production dimensions did not pass by approximately 5% of final load. Subsequently, an investigation into population begins.

March 27, 2014 – TransTech Bus, a TCI Company, again visits C.E. White with a “test buck” for purposes of certifying the TransTech Bus “Tether Strap” which reinforces the stock leg to ensure passing of both FMVSS 571.207 & 571.210. Upon testing completion, the 39SB11 seats are available to use this as a repair. However, because of the enormous forces incurred on the 3-point seating systems, this particular seat will require an additional leg (bolt through floor style)

April 4, 2014 – TransTech Bus finishes the data analysis of all units and submits all data about vehicle population and 573 Reporting.

Identify the remedy:

Transportation Collaborative Inc will forward the information to the affected vehicles owners and dealers that sold the vehicles. Transportation Collaborative has also designed and tested a solution to ensure that remedy of this recall is quick and will not allow your vehicle to be out of service for long.

For 3 Point seats, conventionally known as 39QS11 seats, the method of repair to ensure that vehicles will remain in service is the addition of a second bolt through the floor leg. This leg will unfortunately remove the adjustability of the seat. Installation of this leg will be at the 28.375” dimension as originally specified by testing data. For additional information and reference geometry, you can view the associated documents (SRP 14VQS).





For standard base seats, conventionally known as 39SB11 seats, the method of repair to ensure that your vehicle will remain in service is the additional installation of a frame reinforcing strap this “tether strap” can be viewed in the associated documents (SRP 14VSB).

Any cost incurred to the owners, purchasers and dealers of Vehicles affected by this recall number will be reimbursed by Transportation Collaborative Inc. within a reasonable time of the notifications. Transportation Collaborative Inc. reimburses customers and dealers within 30 days of the remedy whenever possible.

Recall Schedule:

Upon approval of this report and associated documentation, Transportation Collaborative Inc. will notify the affected customers by issuing recall documents of the affected models and VINS, what customers cannot be directly notified will have the last known address (vehicle dealership) notified. This scheduled mailing will occur no later than April 24, 2014.

All questions regarding this recall should be addressed to:

Timothy Downey
Standards & Compliance
Transportation Collaborative Inc.
7 Lake Station Road
Warwick, New York 10990
Phone# 845-988-0419 Fax# 845-988-0324

Prepared by: Timothy Downey, Standards & Compliance, TransTech Bus

Signature:

A handwritten signature in blue ink, appearing to read 'Tim Downey', is written over a light blue grid background.

Date: 04/06/14

