



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

1200 New Jersey Avenue SE  
Washington, DC 20590

September 4, 2015

Mr. Don Chomic  
Director, Product Safety  
Pierce Manufacturing  
2600 American Drive  
PO Box 2017  
Appleton, WI 549122017

NVS-215KS  
15V-511

**Subject:** Headlamps May Flicker In Cold Temperatures

Dear Mr. Chomic:

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/QUANTUM/2014-2015  
PIERCE/VELOCITY/2014-2015

**Mfr's Report Date:** August 12, 2015

**NHTSA Campaign Number:** 15V-511

**Components:**

EXTERIOR LIGHTING:HEADLIGHTS

**Potential Number of Units Affected:** 12

**Problem Description:**

Pierce Manufacturing (Pierce) is recalling certain model year 2014-2015 Velocity and Quantum vehicles manufactured from February 10, 2014, through January 8, 2015, and equipped with LED headlamp assemblies. The headlamps on the affected vehicles may flicker when the vehicle is operated in extreme cold temperatures causing the headlights to provide interrupted illumination. As such, these vehicles fail to comply with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) number 108, "Lamps, Reflective Devices, and Associated Equipment."

**Consequence:**

If the headlights flicker and do not provide steady illumination, other drivers may be confused and the driver may have reduced visibility, increasing the risk of a vehicle crash.

**Remedy:**

Pierce will notify owners, and dealers will replace the headlamps, free of charge. The recall is expected to begin in September 2015. Owners may contact Pierce customer service at 1-888-974-3723. Pierce's number for this recall is 74B264.

**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).



We have received Pierce's proposed owner notification letter and it is currently under review. You will be notified of any changes or concerns once our review is complete.

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.

Please be reminded of the following requirements:

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).

The information in your report suggests that Pierce may have been aware of this issue more than five business days before filing a report with NHTSA. Please explain the gap of time between the January 2015 observation of the flickering lights and the August 2015 noncompliance filing. Please be reminded that under Federal law, this agency is to be notified of all safety defect and/or noncompliance decisions within five business days. 49 CFR 573.6

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