



7 Lake Station Road, Warwick, New York 10990

January 7th, 2016

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

Attention: Kelly Schuler and/or Joshua Neff

In accordance with Code of Federal Regulations, Section 49 Part 573, Trans Tech Bus, on behalf of the Specialty Manufacturing Corporation (hereon known as "SMI") has decided that a defect exists which relates to motor vehicle safety and specifically, Federal Motor Vehicle Safety Standard No. 571.131; "School Bus Pedestrian Safety Devices".

This report has been uploaded to the NHTSA servers on Thursday, January 7th, 2016. If there are any questions regarding the information that has been submitted, please contact Trans Tech Bus, Standard & Compliance Department at 845-988-2333 x206.

Respectfully,

A handwritten signature in blue ink, appearing to read "Tim Downey".

Timothy J. Downey C.D.
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PART 573 Defects and Noncompliance Report

Revision: A

Report Date: January 7th, 2016

I.

Trans Tech Bus has decided to conduct a recall on behalf of Specialty Manufacturing Incorporated, also known as “SMI” (*Equipment Manufacturer*). The defect exists on certain Transpec Series Stop Arms, model series 6000 & 7000, and manufactured between May 1st, 2015 until October 19th, 2015.

The defect involves Federal Motor Vehicle Safety Standard No. 571.131; “School Bus Pedestrian Safety Devices”. Specifically, the adhesive and process used to bond the reflective stop decal to the stop arm body/housing was improperly performed, which can lead to delamination and/or detachment during operation.

Vehicles not involved in the recall:

Trans Tech Bus “School Bus” models, including Student Safety Transporter, Roadstar, and ST Aero, manufactured between May 1st, 2015 until November 15th, 2015 that are confirmed to have been manufactured without Specialty Manufacturing Incorporated (Transpec T6000, T6100, T7000) series stop arms.

Vehicles involved in the recall:

Trans Tech Bus “School Bus” models, including Student Safety Transporter, Roadstar, and ST Aero, manufactured between May 1st, 2015 until November 15th, 2015 that were manufactured with the noncompliant Specialty Manufacturing Incorporated (Transpec T6000, T6100, T7000) series stop arms.

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

99%



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Vehicle population as of January 7th, 2016:

AC139SSSA409	77
AC139SSSP500	1
AE138SSSA409	15
RC139DSSA500	20
SC139DSFP500	20
SC139DSSA409	7
SC139DSSA500	39
SC139DSSP500	1
SC159DSFP600	23
SC159DSSA509	7
SC159DSSA600	33
SE158DSFP600	3
SE158DSSA600	8
UNKNOWN	3

Totals: 257 units.



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Identify and describe how the original recall population was determined:

January 7th, 2016-

Trans Tech Bus received notification from Specialty Manufacturing Incorporated about a defect that exists within certain Transpec Stop Arm models manufactured between May 1st, 2015 until October 19th, 2015. Trans Tech Bus vehicles utilizing these components have manufacture dates from May 1st, 2015 until November 15th, 2015.

II.

Describe the Defect:

SMI has determined that, due to a process deficiency during manufacture, the “STOP” decals on Transpec stop arms (model numbers T6000-, T6100-, T7000-) may not remain adhered to the plastic blade. Failure of the decal either in part or in total may cause the reflective surface to not meet Federal Motor Vehicle Safety Standard 571.131, “School Bus Pedestrian Safety Devices”. Without a reflective decal, the stop arms would have reduced visibility to other drivers, increasing the risk of a crash.

Describe the consequence of the Defect:

The consequence of the defect is reduced visibility to other drivers, increasing the risk of a crash or injury to occupants crossing during loading or unloading of the vehicle.

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

Products manufactured within the affected date range may experience decal delamination as a early warning. However, there are no definitive characteristics, as not all decals will show delamination to the human eye. Physical inspection of date of manufacture is required.

III.

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:

January 6th, 2016 – TransTech Bus, a TCI Company, received notification and subsequently issued a Notification to the National Highway Transportation Safety Administration pursuant to CFR Part 573, and began to determine population metrics.

January 7th, 2016 – TransTech Bus, a TCI Company, finalized it’s population of units and affected serial numbers.



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Identify the remedy:

Replacing the stop arm blade assemblies will resolve the defect (application of the decal to the blade in the field is not recommended). The free service kit provided by SMI will include (1) Transpec stop arm blade (replacement part will be based on the stop arm part, this information can be found on the white label bottom of the stop arm housing, the model number and date of manufacture are printed here) and detailed work instructions. It will be the responsibility of the end-user to inspect for and mitigate the remedy.

To contact Specialty Manufacturing Incorporated and obtain remedy kits, call Customer Service at 1-800-951-7867, or send an e-mail to warranty@smiglobal.net indicating the quantity of Transpec service kits you need along with the following information for each vehicle;

- Company Name
- Contact Name
- Contact Phone
- Contact Email Address (If different than sender's address)
- Mailing Address
- Shipping Address
- Body Number
- Stop Arm Model
- Stop Arm Date of Manufacture
- Vehicle Manufacturer
- Vehicle Identification Number (VIN)

Recall Schedule:

Upon approval of this report, Trans Tech Bus will notify affected customers by issuing dealer and end-user notifications for affected models. This scheduled mailing will occur no later than January 18, 2016.

All questions regarding this recall may be addressed to:

Timothy J. Downey
Standards & Compliance
Trans Tech Bus
7 Lake Station Road
Warwick, New York 10990
Phone: 845.988.2333 x206 Fax: 845.988.0355

Prepared by: Timothy Downey, Standards & Compliance, Trans Tech Bus

Signature:

Date: 01/07/2016