



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

1200 New Jersey Avenue SE
Washington, DC 20590

November 8, 2018

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

NEF-150MR
18V-756

Subject: Brake Light may Randomly Illuminate/FMVSS 108

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/ARROW XT/2017-2018
PIERCE/COMMERCIAL/2017-2018
PIERCE/DASH/2017-2018
PIERCE/ENFORCER/2017-2018
PIERCE/IMPEL/2017-2018
PIERCE/QUANTUM/2017-2018
PIERCE/SABER/2017-2018
PIERCE/VELOCITY/2017-2018

Mfr's Report Date: October 26, 2018

NHTSA Campaign Number: 18V-756

Components:

EXTERIOR LIGHTING:BRAKE LIGHTS

Potential Number of Units Affected: 717

Problem Description:

Pierce Manufacturing (Pierce) is recalling certain 2017-2018 Pierce Arrow XT, Dash, Enforcer, Impel, Quantum, Saber, Velocity, and Commercial vehicles equipped with Whelen accessory brake lights. Depending on the specific wiring of the vehicle, these brake lights may illuminate when the brake pedal has not been pressed. 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 brake lights incorrectly illuminate, it can confuse other drivers, possibly increasing the risk of a crash.

Remedy:

Pierce will notify owners, and Whelen will inspect the vehicles and replace the brake lights, as necessary, free of charge. The recall is expected to begin November 19, 2018. Owners may contact Pierce customer service at 1-888-974-3723.

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.

NHTSA is missing critical, required information for this safety recall. This information must be supplied through the NHTSA Recalls Portal within 5 working days of confirming its accuracy:

- Your company's program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of your company's notification of owners, purchasers and dealers, in accordance with § 573.13 of this part. Your company's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by § 573.13 that is not in a general reimbursement plan shall be submitted in your company's report to NHTSA under this section. If your company submits one or more general reimbursement plans, your company shall update each plan every two years, in accordance with § 573.13. Your company's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters (49 CFR 573.6 (c)(8)(i)). If the vehicles are new and would be covered under the manufacturer's warranty program, please state that in the remedy section of your filing.

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:

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, 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 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 Michelle Rice who may be reached by phone at (202) 366-1060, or by email at michelle.rice@dot.gov. We look forward to working with you.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigations
Enforcement