



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

1200 New Jersey Avenue SE
Washington, DC 20590

July 31, 2020

Ms. Sharon Bachtel
Kiel N.A., L.L.C
2009 Middlebury Street
Elkhart, IN 46516

NEF-150MR
20E-050

Subject: Seat Belts Do Not Extend/FMVSS 209

Dear Ms. Bachtel:

This letter serves to acknowledge Kiel N.A., L.L.C'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:

KIEL/AVANCE/9999

Mfr's Report Date: July 24, 2020

NHTSA Campaign Number: 20E-050

Components:

SEAT BELTS

SEAT BELTS:FRONT

SEAT BELTS:FRONT:RETRACTOR

Potential Number of Units Affected: 1,492

Problem Description:

Kiel N.A. LLC., (Kiel) is recalling certain Avance coach seats, part numbers 2025 and 2050. The automatic locking retractor (ALR) mode of the seat belts supplied with these seats cannot be activated. As such, these seats fail to comply with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) number 209, "Seat Belt Assemblies".

Consequence:

A seat belt that doesn't function properly can increase the risk of injury in the event of a crash.

Remedy:

Kiel will notify the coach bus manufacturers that purchased the seat belts, and dealers for those manufacturers will replace the affected belts, free of charge. The manufacturer has not yet provided a schedule for recall notification. Owners may contact Kiel customer service at 1-574-293-3600.

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.

Please ensure the following requirements are met:

Your company must supply the estimated date(s) for which it will notify dealers and/or distributors regarding this safety recall. If your company subsequently becomes aware that either the beginning or the completion dates reported to the agency for any of the notifications will be delayed by more than two weeks, your company shall promptly advise the agency of the delay and the reasons therefor, and furnish a revised estimate. If your company does not have dealers or distributors, please state so in the 573 (49 CFR 573.6 (c)(8)(ii)).

AMENDED 573 REQUIRED.

The percentage of products estimated to contain the defect or noncompliance (49 CFR 573.6 (c)(4)). If less than 1%, amend your filing to state 1% and provide the actual calculated amount in the first product text box.

AMENDED 573 REQUIRED.

In the case of items of motor vehicle equipment, the manufacturer of the equipment shall identify by name, business address, and business telephone number every manufacturer that purchases the defective or noncomplying component for use or installation in new motor vehicles or new items of motor vehicle equipment (49 CFR 573.6 (c)(2)(v)).

AMENDED 573 REQUIRED.

Your company must supply the estimated date(s) for which it will notify owners regarding this safety recall. Please be reminded that all owners must be notified of the safety risk associated with this filing within 60 days of the 573 being submitted. If the remedy is not available at that time, mail the interim notice, following it with a second notice once the remedy becomes available. If your company subsequently becomes aware that either the beginning or the completion dates reported to the agency for any of the notifications will be delayed by more than two weeks, your company shall promptly advise the agency of the delay and the reasons therefor, and furnish a revised estimate. If there are no owners involved in this recall, please state so in the 573 (49 CFR 573.6 (c)(8)(ii)).

AMENDED 573 REQUIRED.

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).

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,

A handwritten signature in black ink, appearing to read "Josh Neff".

Joshua Neff
Chief, Recall Management Division
Office of Defects Investigations
Enforcement