

# Part 573 Safety Recall Report

## 20E-054

**Manufacturer Name :** Kiel N.A., L.L.C**Submission Date :** MAR 26, 2021**NHTSA Recall No. :** 20E-054**Manufacturer Recall No. :** NR**Manufacturer Information :****Population :****Manufacturer Name :** Kiel N.A., L.L.C**Number of potentially involved :** 437**Address :** 2009 Middlebury Street  
Elkhart IN 46516**Estimated percentage with defect :** 100 %**Company phone :** 574-293-3600**Equipment Information :****Brand / Trade 1 :** Kiel**Model :** Avance**Part No. :** 2025, 2050,1030**Size :** NR**Function :** Coach Seating

**Descriptive Information :** ELR/ALR functionality issue on safety belts on rear cross (last row) passenger seats. Mounting location of belt retractor on rear cross chassis is reducing length of webbing required for switching back from ALR (Automatic Locking Retractor – used for securing a child seat) to ELR (Emergency Locking Retractor – allows the seat belt to freely extend and retract with occupant movement, yet locks the belt during a sudden stop or upon impact) mode on Schnierle belt after activation. ALR is activated by pulling the belt all the way out. ALR is deactivated by unbuckling the belt and allowing it to retract fully. Amount of webbing necessary for deactivation is very close to the switching tolerance of belt. Recall population is based on manufacturing traceability data.

**Production Dates :** JAN 09, 2019 - JUL 02, 2020**Description of Noncompliance :**

**Description of the Noncompliance :** ELR/ALR functionality issue on safety belts on rear cross (last row) passenger seats. Mounting point of belt retractor on rear cross chassis is reducing length of webbing required for switching back from ALR to ELR mode on Schnierle belt after activation. Amount of webbing necessary for deactivation is very close to the switching tolerance of belt.

**FMVSS 1 :** 210 - Seat belt assembly anchorages**FMVSS 2 :** NR

Description of the Safety Risk : Locked belt system

Description of the Cause : Mounting location of belt retractor on rear cross chassis is reducing length of webbing required for switching back from ALR to ELR mode on Schnierle belt after activation.

Identification of Any Warning that can Occur : Belt will not pull out or retract when attempting to switch back from ALR to ELR mode after activation.

### Involved Components :

Component Name : Baseframe

Component Description : Seat chassis

Component Part Number : 177302, 177303, 158777, 158778

### Supplier Identification :

#### Component Manufacturer

Name : FKT

Address : NOSAB 305.Sokak No:1 16145 Nilüfer  
Bursa Foreign States

Country : Turkey

### Chronology :

07/15/2020 Kiel NA was notified by Motor Coach Industries that a seat belt on a rear cross seat was not functioning properly.

07/28/2020 Seat was inspected at Kiel NA.

07/28/20-07/31/20 Root cause analysis identified design issue. Mounting location of belt retractor on rear cross chassis is reducing length of webbing required for switching back from ALR to ELR mode on Schnierle belt after activation.

07/31/2020 - Current – Development of retrofit and long-term solution for relocating mounting location of belt retractor.

**Description of Remedy :**

Description of Remedy Program : All rear cross seats containing chassis 177302, 177303, 158777, 158778 will have a modification installed. This modification will relocate the belt retractor on rear cross chassis allowing the additional webbing needed for switching back to ELR mode. Modification of rear cross chassis will be done at Kiel expense.

How Remedy Component Differs from Recalled Component : Remedied rear cross chassis will have an extension installed.

Identify How/When Recall Condition was Corrected in Production : Modified rear cross chassis mounting location for belt retractor will be implemented prior to any further production.

**Recall Schedule :**

Description of Recall Schedule : TBD

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

**Purchaser Information :**

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name : Motor Coach Industries

Address : 1475 Clarence Avenue  
Manitoba R3T 1T5 Winnipeg 00

Country : CA

Company Phone : 2042246707

Name : BYD Coach & Bus

Address : 46147 7th Street W  
Lancaster CA 93534

Country : US

Company Phone : 6619403250

\* NR - Not Reported