

# Part 573 Safety Recall Report

## 20V-242

**Manufacturer Name :** Motor Coach Industries

**Submission Date :** OCT 08, 2020

**NHTSA Recall No. :** 20V-242

**Manufacturer Recall No. :** SB 482



### Manufacturer Information :

**Manufacturer Name :** Motor Coach Industries

**Address :** 200 East Oakton Street  
Des Plaines IL 60018

**Company phone :** 1-800-241-2947

### Population :

**Number of potentially involved :** 1,276

**Estimated percentage with defect :** 5 %

### Vehicle Information :

**Vehicle 1 :** 2016-2020 MCI J4500

**Vehicle Type :** BUSES, MEDIUM & HEAVY VEHICLES

**Body Style :** OTHER

**Power Train :** DIESEL

**Descriptive Information :** The recall involves passenger seats in which the seat belts may not function properly, resulting in non-compliance with FMVSS 208 and 209. To comply with FMVSS 208, MCI coaches are built with 3-point passenger seat belts that have an emergency locking retractor (ELR) and automatic locking retractor (ALR) on the seat belts. On certain passenger seats supplied by Kiel N.A., MCI has received reports of the seat belts not extending from the retracted position, rendering the seat belt unusable and not compliant with FMVSS 209. The recall vehicles have Kiel passenger seats intended to comply with FMVSS 208, ending with the last such vehicle manufactured prior to MCI and Kiel initiating procedures to inspect all seat belts on Kiel passenger seats used in vehicle production. Vehicles with passenger seats from a supplier other than Kiel are not included in the recall.

**Production Dates :** AUG 26, 2015 - DEC 27, 2019

**VIN Range 1 : Begin :**

NR

**End :** NR

☐ Not sequential

Vehicle 2 : 2018-2018 MCI J3500

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style : OTHER

Power Train : DIESEL

**Descriptive Information :** The recall involves passenger seats in which the seat belts may not function properly, resulting in non-compliance with FMVSS 208 and 209. To comply with FMVSS 208, MCI coaches are built with 3-point passenger seat belts that have an emergency locking retractor (ELR) and automatic locking retractor (ALR) on the seat belts. On certain passenger seats supplied by Kiel N.A., MCI has received reports of the seat belts not extending from the retracted position, rendering the seat belt unusable and not compliant with FMVSS 209. The recall vehicles have Kiel passenger seats intended to comply with FMVSS 208, ending with the last such vehicle manufactured prior to MCI and Kiel initiating procedures to inspect all seat belts on Kiel passenger seats used in vehicle production. Vehicles with passenger seats from a supplier other than Kiel are not included in the recall.

**Production Dates :** APR 26, 2019 - AUG 01, 2019

**VIN Range 1 : Begin :**

NR

**End :** NR

☐ Not sequential

Vehicle 3 : 2015-2016 MCI D4000

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style : OTHER

Power Train : DIESEL

**Descriptive Information :** The recall involves passenger seats in which the seat belts may not function properly, resulting in non-compliance with FMVSS 208 and 209. To comply with FMVSS 208, MCI coaches are built with 3-point passenger seat belts that have an emergency locking retractor (ELR) and automatic locking retractor (ALR) on the seat belts. On certain passenger seats supplied by Kiel N.A., MCI has received reports of the seat belts not extending from the retracted position, rendering the seat belt unusable and not compliant with FMVSS 209. The recall vehicles have Kiel passenger seats intended to comply with FMVSS 208, ending with the last such vehicle manufactured prior to MCI and Kiel initiating procedures to inspect all seat belts on Kiel passenger seats used in vehicle production. Vehicles with passenger seats from a supplier other than Kiel are not included in the recall.

**Production Dates :** JUN 22, 2015 - SEP 08, 2015

**VIN Range 1 : Begin :**

NR

**End :** NR

☐ Not sequential

Vehicle 4 : 2017-2017 MCI D4005

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style : OTHER

Power Train : DIESEL

**Descriptive Information :** The recall involves passenger seats in which the seat belts may not function properly, resulting in non-compliance with FMVSS 208 and 209. To comply with FMVSS 208, MCI coaches are built with 3-point passenger seat belts that have an emergency locking retractor (ELR) and automatic locking retractor (ALR) on the seat belts. On certain passenger seats supplied by Kiel N.A., MCI has received reports of the seat belts not extending from the retracted position, rendering the seat belt unusable and not compliant with FMVSS 209. The recall vehicles have Kiel passenger seats intended to comply with FMVSS 208, ending with the last such vehicle manufactured prior to MCI and Kiel initiating procedures to inspect all seat belts on Kiel passenger seats used in vehicle production. Vehicles with passenger seats from a supplier other than Kiel are not included in the recall.

**Production Dates :** JAN 23, 2017 - MAR 07, 2017

**VIN Range 1 : Begin :**

NR

**End :** NR

☐ Not sequential

Vehicle 5 : 2015-2020 MCI D4500

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style : OTHER

Power Train : DIESEL

**Descriptive Information :** The recall involves passenger seats in which the seat belts may not function properly, resulting in non-compliance with FMVSS 208 and 209. To comply with FMVSS 208, MCI coaches are built with 3-point passenger seat belts that have an emergency locking retractor (ELR) and automatic locking retractor (ALR) on the seat belts. On certain passenger seats supplied by Kiel N.A., MCI has received reports of the seat belts not extending from the retracted position, rendering the seat belt unusable and not compliant with FMVSS 209. The recall vehicles have Kiel passenger seats intended to comply with FMVSS 208, ending with the last such vehicle manufactured prior to MCI and Kiel initiating procedures to inspect all seat belts on Kiel passenger seats used in vehicle production. Vehicles with passenger seats from a supplier other than Kiel are not included in the recall.

**Production Dates :** MAY 18, 2015 - MAR 19, 2020

**VIN Range 1 : Begin :**

NR

**End :** NR

☐ Not sequential

Vehicle 6 : 2015-2020 MCI D4505

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style : OTHER

Power Train : DIESEL

**Descriptive Information :** The recall involves passenger seats in which the seat belts may not function properly, resulting in non-compliance with FMVSS 208 and 209. To comply with FMVSS 208, MCI coaches are built with 3-point passenger seat belts that have an emergency locking retractor (ELR) and automatic locking retractor (ALR) on the seat belts. On certain passenger seats supplied by Kiel N.A., MCI has received reports of the seat belts not extending from the retracted position, rendering the seat belt unusable and not compliant with FMVSS 209. The recall vehicles have Kiel passenger seats intended to comply with FMVSS 208, ending with the last such vehicle manufactured prior to MCI and Kiel initiating procedures to inspect all seat belts on Kiel passenger seats used in vehicle production. Vehicles with passenger seats from a supplier other than Kiel are not included in the recall.

**Production Dates :** JUN 10, 2015 - DEC 26, 2019

**VIN Range 1 : Begin :**

NR

**End :** NR

☐ Not sequential

### Description of Noncompliance :

**Description of the Noncompliance :** In some instances the Kiel seat belts do not extend from the retracted position, rendering the seat belt unusable and not compliant with FMVSS 209, and the seat not compliant with FMVSS 208.

**FMVSS 1 :** 208 - Occupant crash protection

**FMVSS 2 :** 209 - Seat belt assemblies

**Description of the Safety Risk :** The inability to use the seat belt could increase the risk of personal injury in the event of a collision

**Description of the Cause :** Kiel advises that the cause is due to the ALR functionality of the seat belt retractor not deactivating properly when the seat belt retracts to its stowed position, resulting in the inability to extend the seat belt for proper use by a passenger.

**Identification of Any Warning that can Occur :** A passenger attempting to use the seat belt would not be able to extend the seat belt from its stowed position due to the seat belt being locked by a defective retractor.

### Involved Components :

Component Name 1 : Seat belt assembly

Component Description : Seat belt assembly

Component Part Number : 03-11-2762

### Supplier Identification :

#### Component Manufacturer

Name : Kiel N.A., L.L.C.

Address : 2009 Middlebury Street  
Elkhart Indiana 46516

Country : United States

### Chronology :

On 9/27/2019, MCI received reports of passenger seat belts not extending on vehicles with Kiel passenger seats. MCI notified Kiel of the reports, provided Kiel with the defective seat belts that had been removed and replaced, and requested that Kiel investigate.

On 10/10/2019, Kiel advised that initial testing indicated a possible problem with the ALR function of the retractor.

On 10/29/2019, Kiel advised that analysis of the defective seat belt assemblies returned for analysis indicated that the ELR function of the retractor was functioning properly until the ALR was activated; that the cause of the seat belt not extending was the ALR function of the seat belt retractor not releasing when the seat belt was released to be stowed; and that the problem with the ALR function was not intermittent, meaning that if the seat belt could be extended and otherwise functioned properly, it would continue to function properly.

On 11/4/2019, Kiel advised that on the seat belts returned for analysis, the potential issue with the ALR not functioning properly was that it might be activating too early, thus preventing the seat belt from fully extending.

In November 2019, MCI and Kiel inspected other vehicles with Kiel passenger seats. Seat belts that were not functioning properly were removed and replaced, and provided to Kiel for further analysis.

On 11/22/2019, Kiel advised MCI that Kiel did not consider the defective seat belts to be a safety issue, and that the problem was limited to a specific batch of seat belts.

MCI and Kiel inspect additional vehicles with seat belts within the batch identified by Kiel, and outside the batch. Additional defective seat belts are found on vehicles in both groups.

In February 2020 MCI requests that Kiel conduct an equipment recall for its defective seat belts.

After Kiel fails to do so, and after discussions with NHTSA, MCI decides to conduct a vehicle recall to remedy the defective Kiel seat belts.

## Description of Remedy :

**Description of Remedy Program :** Recalled vehicles will be inspected for (1) seat belts bearing a purchase order number identified by Kiel as needing replacement (PO 121875), and (2) seat belts that cannot be extended from the stored position. Seat belts that fall within either inspection category will be replaced at no cost to vehicle owners. MCI will also reimburse vehicle owners for the time required to inspect the seat belts and, if necessary, replace them.

**How Remedy Component Differs from Recalled Component :** There is no visible difference in the Kiel passenger seat belt assemblies between the recalled seat belt assembly and the remedy seat belt component. The remedied seat belt assembly will allow extension from the stored seat belt position. The recalled passenger seat belt assembly is either within the batch identified by Kiel, or is found to not allow extension during the inspection.

**Identify How/When Recall Condition was Corrected in Production :** In or about March 2020 MCI and Kiel initiated procedures to inspect all seat belts on Kiel passenger seats used in vehicle production. Any seat belts not allowing extension, either initially or after being extended and then stowed, are replaced and then rechecked.

## Recall Schedule :

**Description of Recall Schedule :** MCI mailed interim owner notification letters on June 26, 2020. Upon determination of the recall remedy, MCI will mail final owner notification letters and service bulletins within seven (7) days after NHTSA approval.

**Planned Dealer Notification Date :** NOV 30, 2020 - NOV 30, 2020

**Planned Owner Notification Date :** NOV 30, 2020 - NOV 30, 2020

\* NR - Not Reported