New Vehicle Safety Certification Requirements for Vehicles, U.S. and Canada

M-170-002

(Jan 2007)

Valid for

All Mack CXU,CHU,GU,MRU,LEU

Case description

Changes to the U.S. Federal regulations concerning new vehicle safety certification have been made by the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA). These changes, which are effective February 13, 2003, require revised vehicle certification labeling, documentation and procedures. Compliance with the new requirements before the effective date is permitted. The following reviews both the newU.S. requirements and the current Canadian requirements.

Certification Requirements

IT IS MANDATORY THAT ALL BRANCH, DISTRIBUTOR AND SUBSIDIARY PERSONNEL INVOLVED IN THE PREPARATION AND SALE OF NEW VEHICLES BE ADVISED OF THE NEW VEHICLE SAFETY CERTIFICATION PROCEDURES OUTLINED HEREIN. PENALTIES FOR NONCOMPLIANCE WITH APPLICABLE REGULATIONS ARE SEVERE (AS HIGH AS $1,000,000).

The purpose of this bulletin is to provide guidance concerning the current U.S. and Canadian Federal requirements for certifying and labeling a new motor vehicle relative to its compliance with applicable U.S. Federal Motor Vehicle Safety Standards (FMVSS) or Canada Motor Vehicle Safety Standards (CMVSS). This information is relevant to a new vehicle on which further work (manufacturing) is to be performed or a new vehicle that is "altered" between the time it is certified as a completed vehicle and the time that it is delivered to the customer. These regulations are applicable to a new vehicle intended for sale in Canada, OR a new vehicle intended for sale in the U.S. or its territories, which include the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, the Virgin Islands and American Samoa. U.S. new vehicle safety certification requirements are found in Title 49, Code of Federal Regulations (CFR), Part 567, "Certification", and Part 568, "Vehicles Manufactured in Two or More Stages — All Incomplete, Intermediate and Final- Stage Manufacturers of Vehicles Manufactured in Two or More Stages." Many public libraries keep a complete, up-to-date set of the CFR on file. The CFR are also available on the internet at the NHTSA website (www.nhtsa.dot.gov). Canadian vehicle certification requirements are found in Sections 6 through 9 of the Motor Vehicle Safety Regulations (MVSR). The MVSR may be found at Federal government bookstores and many law libraries. They are also available on the internet at the Transport Canada website (www.tc.gc.ca). IT IS STRONGLY RECOMMENDED THAT PERSONNEL OBTAIN AN OFFICIAL COPY OF THE APPROPRIATE REGULATIONS AND BECOME FAMILIAR WITH THEM.

Effective on and after September 1, 2006, each manufacturer of a new vehicle manufactured in two or more stages, and intended for sale in the U.S. or its territories (see following definitions of "incomplete vehicle," "incomplete vehicle manufacturer," "intermediate manufacturer" and "final-stage manufacturer") must comply with new requirements for new vehicle safety certification/labeling established by NHTSA. An "incomplete vehicle manufacturer" such as Mack Trucks, Inc. must affix a new "INFORMATION LABEL" to each incomplete vehicle it manufactures (a "chassis-cab label" is no longer required by the NHTSA). An "intermediate manufacturer" must also affix a new "INFORMATION LABEL" to each incomplete vehicle on which it performs manufacturing. These new labels basically list the manufacturer's name, the manufacturing date, the gross vehicle weight rating (GVWR) and the gross axle weight rating (GAWR) of the incomplete vehicle. In addition, depending on the actual manufacturing performed, an "intermediate manufacturer" may have to add an "addendum" to the "incomplete vehicle document (IVD)."

Mack Trucks, Inc. will continue to offer distributors and branches a partially printed version of the U.S. "Final-Stage Manufacturer's" vehicle safety certification label and the U.S. "Alterer's" vehicle safety certification label, as well as the new U.S. "INFORMATION LABEL" for "Intermediate Manufacturers," through the MACK Parts System.

National Safety Mark (NSM) Reminder — Vehicles Destined for Sale in Canada

ALL DISTRIBUTORS AND BRANCHES THAT PERFORM MANUFACTURING ON AN “INCOMPLETE VEHICLE” DESTINED FOR SALE IN CANADA ARE REMINDED THAT THEY MUST, IF THEY HAVE NOT ALREADY, APPLY TO TRANSPORT CANADA TO OBTAIN AUTHORIZATION (i.e., obtain an authorization number that is incorporated into a separate national safety mark label) TO AFFIX A NATIONAL SAFETY MARK (NSM) CONTAINING LABEL SIGNIFYING THAT THE WORK WAS PERFORMED BY AN AUTHORIZED MANUFACTURER. IT IS THE RESPONSIBILITY OF EACH INDIVIDUAL DISTRIBUTOR AND BRANCH TO OBTAIN ITS OWN SPECIFIC AUTHORIZATION NUMBER AND NSM LABEL, IF THEY HAVE NOT ALREADY DONE SO.

The figure, similar to the one shown in the illustration below, must be at least 13 mm in diameter depicting the NSM, and showing in its center, in figures at least 2 mm in height, the authorization number assigned to the manufacturer by Transport Canada.

Typical Canadian National Safety Mark Label

The authorization number may be obtained by writing to Transport Canada at the following address:

Director, Road Safety & Motor Vehicle Regulation Transport Canada 330 Sparks Street Tower C, 8th Floor Ottawa, Ontario K1A 0N5

Include your company's name and address (and the address[es] of your “manufacturing facility[ies]” if it [they] differs from the company address).

The label containing the NSM must be permanently attached to the vehicle (i.e., using permanent adhesive), be resistant to or protected against any weather condition to which the label may be exposed and have lettering that is clear and indelible, indented, embossed or in a color that contrasts with the background color of the label and in block capital letters and numerals not less than 2 mm in height.

In the past, when a vehicle intended for sale in Canada was manufactured as a “completed vehicle” in a MACK assembly plant in the U.S., it was considered an “imported vehicle” within the Canadian regulations, and in place of the NSM, MACK utilized a VEHICLE SAFETY CERTIFICATION LABEL with the certification statement “THIS VEHICLE CONFORMS TO ALL APPLICABLE STANDARDS PRESCRIBED UNDER THE CANADIAN MOTOR VEHICLE SAFETY REGULATIONS IN EFFECT ON THE DATE OF MANUFACTURE,” in BOTH English and French. However, Transport Canada recently advised MACK that an NSM can be used in place of the certification statement. Appropriate MACK labels now include the MACK NSM.

PENALTIES FOR VIOLATIONS

The National Traffic and Motor Vehicle Safety Act of 1966 and its amendments (codified as Title 49, United States Code [49 U.S.C.], Chapter 301, Motor Vehicle Safety; available on the internet at the NHTSA website [www.nhtsa.dot.gov]) authorize the establishment of the U.S. Federal Motor Vehicle Safety Standards and new vehicle safety certification requirements (reference Title 49, Code of Federal Regulations [49 CFR], Parts 567, 568 and 571), as well as other related regulations. Penalties for noncompliance are severe. A single violation of the requirements may result in a fine of up to $6,000. For a series of related violations, the maximum possible fine is $16,375,000.

The Canada Motor Vehicle Safety Act and its amendments (codified as Statutes of Canada, 1993 Chapter 16; available on the internet at the Transport Canada website [www.tc.gc.ca]) authorize the establishment of the Canada Motor Vehicle Safety Standards and new vehicle safety certification requirements (reference Motor Vehicle Safety Regulations Sections 1 through 9 and 100 through 1106), as well as other related regulations. The penalties for noncompliance are severe. Any company that violates these requirements may be fined up to $1,000,000.

These penalties are applicable to any company that:

1. Manufactures a vehicle for sale that does not comply with all applicable Motor Vehicle Safety Standards in effect at the time the vehicle was manufactured; or
2. Offers a vehicle for sale that does not comply with all applicable Motor Vehicle Safety Standards in effect at the time the vehicle was manufactured; or
3. Sells a vehicle that does not comply with all applicable Motor Vehicle Safety Standards in effect at the time the vehicle was manufactured; or
4. Fails to provide the proper certification labels and documents for a vehicle, in the manner required; or
5. Provides the required certification labels and documents in spite of knowing that the vehicle does not comply with all applicable Motor Vehicle Safety Standards.

VEHICLE SAFETY CERTIFICATION COMPLIANCE IS AN ABSOLUTE NECESSITY

DEFINITIONS

ADDENDUM, for the purposes of U.S. regulations, means a document that contains the INTERMEDIATE MANUFACTURER's name and mailing address and an indication of all changes that should be made to the INCOMPLETE VEHICLE DOCUMENT to reflect changes that the INTERMEDIATE MANUFACTURER made to the INCOMPLETE VEHICLE. The ADDENDUM shall also contain a certification by the INTERMEDIATE MANUFACTURER that the statements contained in the ADDENDUM are accurate as of the date of manufacture by the INTERMEDIATE MANUFACTURER and can be used and relied on by any subsequent INTERMEDIATE MANUFACTURER(S) and the FINAL-STAGE MANUFACTURER as a basis for certification.

ALTERED VEHICLE, for the purposes of U.S. regulations, means a COMPLETED VEHICLE previously certified that has been altered other than by the addition, substitution or removal of readily attachable components, such as mirrors or tire assemblies, or by minor finishing operations such as painting, before the first purchase of the vehicle other than for resale, in such a manner as may affect the conformity of the vehicle with one or more Federal Motor Vehicle Safety Standard(s) or the validity of the vehicle's stated weight ratings or VEHICLE TYPE classification.

ALTERER, for the proposes of U.S. regulations, means a person who alters by addition, substitution or removal of components (other than readily attachable components) a certified vehicle before the first sale of the vehicle other than for resale. (Also see ALTERED VEHICLE.)

COMPETITION VEHICLE, for the purposes of Canadian regulations, means a vehicle that is designed for use exclusively in closed-course competition and (a) bears a label affixed by the manufacturer stating, in both official languages, that the vehicle is a competition vehicle and is for use in closed-course competition, or (b) is accompanied by a signed declaration clearly indicating that the vehicle is a competition vehicle and is for use exclusively in closed-course competition.

COMPLETED VEHICLE, for the purposes of U.S. regulations, means a vehicle that requires no further manufacturing operations to perform its intended function. COMPLETED VEHICLE, for the purposes of Canadian regulations, means a vehicle that needs no further manufacturing operations to perform its intended function, other than the addition of readily attachable components such as mirrors or tire and rim assemblies, or minor finishing operations such as painting. (At the present time, only a TRUCK TRACTOR with a MACK assembly plant-installed fifth wheel is certified by Mack Trucks, Inc. as a COMPLETED VEHICLE.)

EXPORT VEHICLE, means a vehicle that is destined for sale in a country other than the U.S. and its territories, or Canada. Although MACK assembly plants in the U.S. do "export" vehicles to Canada, these Canadian vehicles are not grouped into the general EXPORT VEHICLE category because they must comply with standards and regulations which are very similar to the FMVSS, i.e., the CMVSS.

FINAL-STAGE MANUFACTURER, for the purposes of U.S. regulations, means a person who performs the manufacturing operations on an INCOMPLETE VEHICLE that it becomes a COMPLETED VEHICLE. FINAL-STAGE MANUFACTURER, for the purposes of Canadian regulations, means a company that performs the manufacturing operations on an INCOMPLETE VEHICLE that turn the INCOMPLETE VEHICLE into a COMPLETED VEHICLE.

FIREFIGHTING VEHICLE, for the purposes of U.S. regulations, means a vehicle designed exclusively for the purposes of fighting fires.

GROSS AXLE WEIGHT RATING (GAWR) means the value specified by a vehicle manufacturer as the load-carrying capacity of a single axle system (comprised of the axle, suspension, tires, rims/wheels and other components, such as the frame rails, as applicable), as measured at the tire-ground interface.

GROSS VEHICLE WEIGHT RATING (GVWR) means the value (usually the sum of the GAWRs, but not necessarily) specified by a vehicle manufacturer as the loaded weight of a single vehicle, as measured at the tire-ground interface.

INCOMPLETE VEHICLE, for the purposes of U.S. regulations, means (1) An assemblage consisting, at a minimum, of chassis (including the frame) structure, powertrain, steering system, suspension system, and braking system, in the state that those systems are to be part of the COMPLETED VEHICLE, but requires further manufacturing operations to become a COMPLETED VEHICLE; or (2) An incomplete trailer. INCOMPLETE VEHICLE, for the purposes of Canadian regulations, means a vehicle (a) other than a VEHICLE IMPORTED TEMPORARILY FOR SPECIAL PURPOSES that is capable of being driven and that consists, at a minimum, of chassis structure, powertrain, steering system, suspension system and braking system in the state in which those systems are to be part of the COMPLETED VEHICLE, but that requires further manufacturing operations to become a COMPLETED VEHICLE, or (b) that is an incomplete trailer.

INCOMPLETE VEHICLE DOCUMENT (IVD) means a multiple-page document supplied by the INCOMPLETE VEHICLE MANUFACTURER that contains specific statements with regard to the vehicle safety certification status of the INCOMPLETE VEHICLE as it left the control of the INCOMPLETE VEHICLE MANUFACTURER. The IVD is used by INTERMEDIATE and/or FINAL-STAGE MANUFACTURERS during the completion of further certification procedures. The IVD should not be removed from the INCOMPLETE VEHICLE until final certification as a COMPLETED VEHICLE takes place, i.e., the FINAL-STAGE MANUFACTURER should keep the IVD.

INCOMPLETE VEHICLE MANUFACTURER, for the purposes of U.S. regulations, means a person who manufactures an INCOMPLETE VEHICLE by assembling components, none of which, taken separately, constitute an INCOMPLETE VEHICLE. An INCOMPLETE VEHICLE, for the purposes of Canadian regulations, means a company that manufactures an INCOMPLETE VEHICLE by assembling components, none of which, taken separately, constitute an INCOMPLETE VEHICLE.

INFORMATION LABEL means a label required by U.S. Code of Federal Regulations Section 49 DFR 567.5, or Section 6 of the Canadian Motor Vehicle Safety Regulations. Such labels must be permanently affixed to the cab of applicable vehicles in specific locations (listed later in this bulletin), and must contain specific information, in the English language (some English and French in Canada), lettered in block capital letters and numerals not less than 2.4 millimeters (3/32 of an inch) high (not less than 2 millimeters high for Canada), in a color that contrasts with the label background. The labels, unless of a riveted metal configuration, must be of such construction that they cannot be removed without destroying or defacing them.

INTERMEDIATE MANUFACTURER, for the purposes of U.S. regulations, means a person, other than the INCOMPLETE VEHICLE MANUFACTURER or FINAL-STAGE MANUFACTURER, who performs manufacturing operations on a vehicle manufactured in two or more stages. INTERMEDIATE MANUFACTURER, for the purposes of Canadian regulations, means a company, other than an INCOMPLETE VEHICLE MANUFACTURER or FINAL-STAGE MANUFACTURER that performs manufacturing operations on an INCOMPLETE VEHICLE.

SPECIAL APPLICATION VEHICLE means a vehicle that is not registered and licensed for use on the public streets, roads and highways of the U.S. and its territories or Canada, i.e., it will be used in an “off-highway” operation on private roads.

TRUCK, for the purposes of U.S. regulations, means a motor vehicle with motive power, except a trailer, designed primarily for the transportation of property or special-purpose equipment. TRUCK, for the purposes of Canadian regulations, means a vehicle designed primarily for the transportation of property or special-purpose equipment, but does not include a COMPETITION VEHICLE, a crawler-mounted vehicle, a trailer, a WORK VEHICLE, a VEHICLE IMPORTED TEMPORARILY FOR SPECIAL PURPOSES or a vehicle designed for operation exclusively off-road.

TRUCK TRACTOR, for the purposes of U.S. regulations, means a TRUCK designed primarily for drawing other motor vehicles and not so constructed as to carry a load other than a part of the weight of the vehicle and the load so drawn. TRUCK TRACTOR, for the purposes of Canadian regulations, means a TRUCK designed primarily for drawing other vehicles and not constructed for carrying any load other than a part of the weight of the vehicle and load drawn, and includes a vehicle designed to accept a fifth-wheel coupling, but does not include a crane-equipped breakdown vehicle.

VEHICLE IMPORTED TEMPORARILY FOR SPECIAL PURPOSES, for the purposes of Canadian regulations, means a vehicle imported into Canada for a period not longer than one year solely for the purpose of (a) undergoing further

manufacturing prior to export, or (b) conducting works or operations that require a specially designed vehicle for entertainment industry productions, civil engineering projects or similar works or operations.

VEHICLE SAFETY CERTIFICATION LABEL means the general term given to all labels used to signify vehicle compliance with the various safety certification requirements of Title 49, Code of Federal Regulations, Parts 567 and 568, in the U.S., and Sections 6 through 9 of the Canadian Motor Vehicle Safety Regulations. Such labels must be permanently affixed to the cab of applicable vehicles in specific locations (listed later in this bulletin), and must contain explicit statements, in the English language (some in English and French in Canada), lettered in block capital letters and numerals not less than 2.4 millimeters (3/32 of an inch) high (not less than 2 millimeters high for Canada), in a color that contrasts with the label background. The labels, unless of a riveted metal configuration, must be of such construction that they cannot be removed without destroying or defacing them.

VEHICLE TYPE means one of a number of classifications of motor vehicles which includes “bus,” “FIREFIGHTING VEHICLE” (U.S. only), “multipurpose passenger vehicle,” “school bus,” “trailer,” “TRUCK” and “TRUCK TRACTOR.” In U.S. regulations, the definitions of the various VEHICLE TYPES are found in Title 49, Code of Federal Regulations, Section 571.3; in Canadian regulations, VEHICLE TYPES are found in Section 6 of the Motor Vehicle Safety Regulations.

WORK VEHICLE, for the purposes of Canadian regulations, means a vehicle designed primarily for the performance of work in the construction of works of civil engineering and in maintenance, that is not constructed on a truck-chassis or a truck-type chassis, but does not include a tractor or any vehicle designed primarily to be drawn behind another vehicle.

LOCATIONS FOR REGULATION-REQUIRED LABELS

Each label required by vehicle safety certification regulations must be located on either the hinge pillar, door latch post, or the door edge that meets the door latch post, next to the driver's seating position, or if none of these locations is practicable, to the left side of the instrument panel. If that location is also not practicable, the label(s) shall be affixed to the inward-facing surface of the door, next to the driver's seating position.

For U.S. regulations, if none of the preceding locations are practicable, the party intending to affix the label must submit notification of the fact, along with drawings or photographs showing a suggested alternate location in the same general area, to Administrator, National Highway Traffic Safety Administration, Washington, DC 20590. The location of the label shall be such that it is easily readable without moving any part of the vehicle except an outer door.

For Canadian regulations, if the preceding locations are impracticable, then the label may be affixed to a conspicuous and readily accessible position.

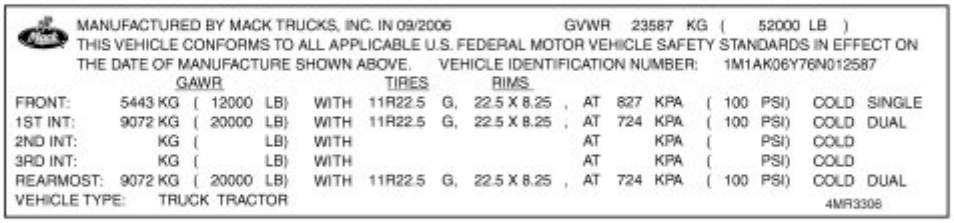
VEHICLE SAFETY CERTIFICATION RESPONSIBILITIES

Vehicles as Received from a MACK Assembly Plant

Each new MACK vehicle as released by its assembly plant is certified as to the extent of its compliance with applicable FMVSS or CMVSS, either as a COMPLETED VEHICLE, an INCOMPLETE VEHICLE/CHASSIS-CAB, an EXPORT VEHICLE or a SPECIAL APPLICATION VEHICLE.

Affixed to each COMPLETED VEHICLE is a COMPLETED VEHICLE SAFETY CERTIFICATION LABEL. The label used for vehicles intended for sale in the U.S. and its territories is similar to the label shown in Figure 2, while the label used for vehicles intended for sale in Canada is similar to the label shown in Figure 3. The label lists the manufacturer, month and year of manufacture, the vehicle identification number (VIN), the VEHICLE TYPE (for Canada, in BOTH English and French), i.e., TRUCK (CAMION, in French) or TRUCK TRACTOR (CAMION TRACTEUR, in French), the GAWR (PNBE, in French) for each axle system and the GVWR (PNBV, in French) at the time the vehicle left the assembly plant (Canada requires both English and French for the abbreviations, with metric units of weight; the U.S. requires both metric and English units of weight; for reference, 1 lb = 0.4536 kg and 1 psi = 6.895 kPa). The label also includes tire size, rim size and tire inflation pressure, as required by MVSS 120, Tire Selection and Rims for Motor Vehicles With a GVWR of More Than 4 536 kilograms (10,000 pounds), as well as a “certification statement” that the vehicle conforms to all applicable MVSS in effect on the date of the vehicle's manufacture. The U.S. requires both metric and English units of pressure. Canada requires only metric units of pressure, but requires the “certification statement” in BOTH English and French for imported vehicles (the National Safety Mark typically serves as a “certification statement” for other vehicles). Unless such a vehicle is “altered” (see definition of ALTERED VEHICLE) prior to its being offered for sale, no further certification is required.

Typical U.S. Completed Vehicle Safety Certification Label



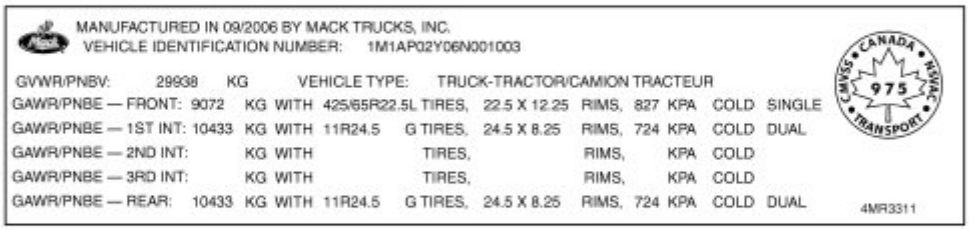
MANUFACTURED BY MACK TRUCKS, INC. IN 09/2006 GVWR 23587 KG (52000 LB)
THIS VEHICLE CONFORMS TO ALL APPLICABLE U.S. FEDERAL MOTOR VEHICLE SAFETY STANDARDS IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE. VEHICLE IDENTIFICATION NUMBER: 1M1AK06Y76N012587

	GAWR		TIRES	RIMS						
FRONT:	5443 KG	(12000 LB)	WITH 11R22.5 G,	22.5 X 8.25 ,	AT 827 KPA	(100 PSI)	COLD	SINGLE		
1ST INT:	9072 KG	(20000 LB)	WITH 11R22.5 G,	22.5 X 8.25 ,	AT 724 KPA	(100 PSI)	COLD	DUAL		
2ND INT:	KG	(LB)	WITH		AT KPA	(PSI)	COLD			
3RD INT:	KG	(LB)	WITH		AT KPA	(PSI)	COLD			
REARMOST:	9072 KG	(20000 LB)	WITH 11R22.5 G,	22.5 X 8.25 ,	AT 724 KPA	(100 PSI)	COLD	DUAL		

VEHICLE TYPE: TRUCK TRACTOR

4MR3306

Typical Canadian Completed Vehicle Safety Certification Label



MANUFACTURED IN 09/2006 BY MACK TRUCKS, INC.
VEHICLE IDENTIFICATION NUMBER: 1M1AP02Y06N001003

GVWR/PNBV: 29938 KG VEHICLE TYPE: TRUCK-TRACTOR/CAMION TRACTEUR

GAWR/PNBE — FRONT:	9072 KG	WITH	425/65R22.5L TIRES,	22.5 X 12.25	RIMS,	827 KPA	COLD	SINGLE	
GAWR/PNBE — 1ST INT:	10433 KG	WITH	11R24.5 G TIRES,	24.5 X 8.25	RIMS,	724 KPA	COLD	DUAL	
GAWR/PNBE — 2ND INT:	KG	WITH	TIRES,		RIMS,	KPA	COLD		
GAWR/PNBE — 3RD INT:	KG	WITH	TIRES,		RIMS,	KPA	COLD		
GAWR/PNBE — REAR:	10433 KG	WITH	11R24.5 G TIRES,	24.5 X 8.25	RIMS,	724 KPA	COLD	DUAL	

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975
TRANSPORT

4MR3311

Note: In order to comply with 49 U.S.C. CHAPTER 301, COMPLETED VEHICLES and INCOMPLETE VEHICLES/CHASSIS-CABS manufactured in the U.S. and destined for sale in Canada have, in addition to the COMPLETED VEHICLE SAFETY CERTIFICATION LABEL, EXPORT VEHICLE LABELS, similar to the labels shown in Figure 4, affixed to the cab.

Note: A VEHICLE WHICH CONFORMS TO ALL APPLICABLE U.S. FEDERAL MOTOR VEHICLE SAFETY STANDARDS DOES NOT NECESSARILY CONFORM TO ALL APPLICABLE CANADA MOTOR VEHICLE SAFETY STANDARDS. LIKEWISE, A VEHICLE WHICH CONFORMS TO ALL APPLICABLE CANADA MOTOR VEHICLE SAFETY STANDARDS DOES NOT NECESSARILY CONFORM TO ALL U.S. FEDERAL MOTOR VEHICLE SAFETY STANDARDS.

Typical Export Labels

MANUFACTURED FOR
EXPORT ONLY BY
MACK TRUCKS, INC.

DATE: 10/2002

VIN: 1M1AE07Y73W014756

SEQ. NO.: W021031002

AFFIXED TO DOOR AREA.

MANUFACTURED BY

MACK TRUCKS, INC.
BOX M
ALLENTOWN, PA 18105

THIS VEHICLE IS INTENDED FOR EXPORT AND THE MANUFACTURER MAKES NO REPRESENTATION AS TO CONFORMANCE WITH U.S. FEDERAL MOTOR VEHICLE SAFETY STANDARDS.

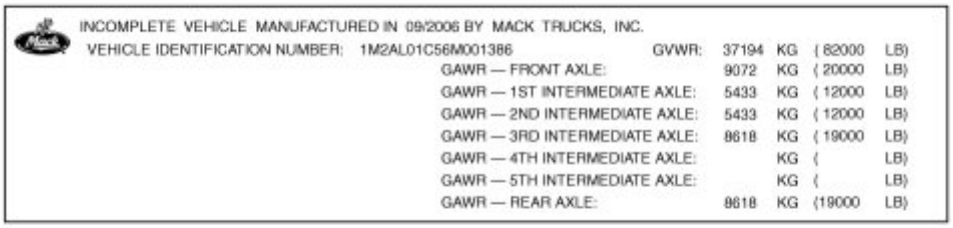
AFFIXED TO WINDSHIELD.

Many MACK vehicles leave the assembly plant as INCOMPLETE VEHICLES. Each INCOMPLETE VEHICLE is supplied from the assembly plant with an INCOMPLETE VEHICLE DOCUMENT (IVD), similar to the document shown in Figure 5, which specifies the safety standards that are applicable to that INCOMPLETE VEHICLE and to what extent the INCOMPLETE VEHICLE complies with each of those standards. The IVD lists the VIN, the applicable GVWR and GAWRs, and corresponding tire and rim information (which must be entered on the INTERMEDIATE MANUFACTURER'S INFORMATION LABEL [if applicable] and the FINAL-STAGE MANUFACTURER'S VEHICLE SAFETY CERTIFICATION LABEL when the vehicle is completed, assuming that there have been no changes to the applicable components or additions to the vehicle that changed any GAWR or GVWR). The IVD also specifies whether the INCOMPLETE VEHICLE has been built to conform with U.S. or Canadian regulations. All of this information applies only to the INCOMPLETE VEHICLE as it left the MACK assembly plant. The IVD must remain with the INCOMPLETE VEHICLE (so that it is available to subsequent manufacturers) until the FINAL-STAGE MANUFACTURER affixes an appropriate VEHICLE SAFETY CERTIFICATION LABEL. The FINAL-STAGE MANUFACTURER should keep the IVD in its files. An INTERMEDIATE MANUFACTURER should make and keep a copy of the IVD for their files.

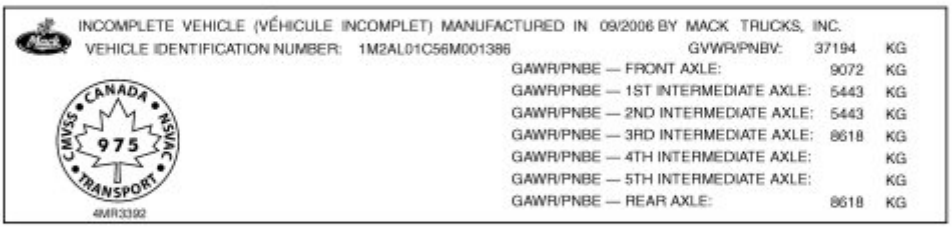
Typical Incomplete Vehicle Document

In addition to the IVD, INCOMPLETE VEHICLES have an INCOMPLETE VEHICLE INFORMATION LABEL, similar to the label shown in Figure 6 or 7, affixed to the cab. These labels list the name of the INCOMPLETE VEHICLE MANUFACTURER, the date of manufacture, the VIN and the GVWR and GAWRs of the INCOMPLETE VEHICLE. This label MUST NOT be removed or covered up at any time during the vehicle safety certification process.

Typical U.S. Incomplete Vehicle Manufacturer's Information Label

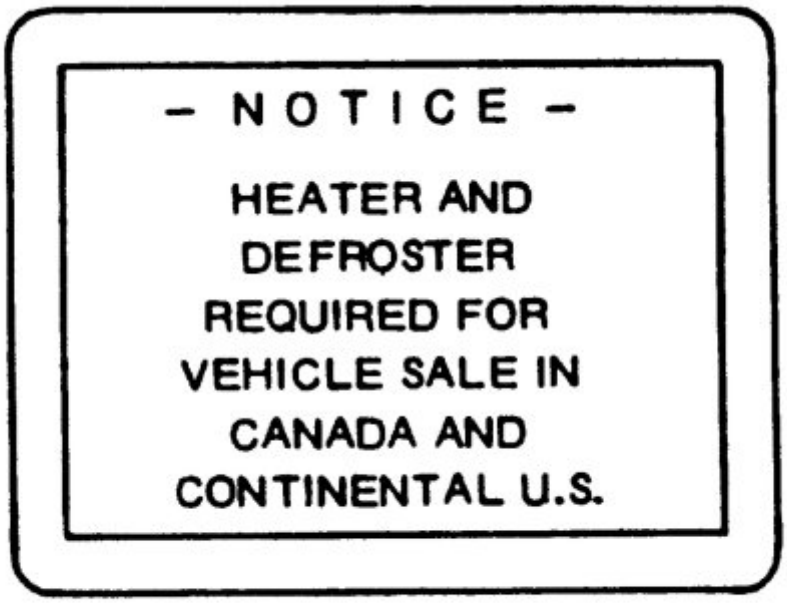


Typical Canadian Incomplete Vehicle Manufacturer's Information Label



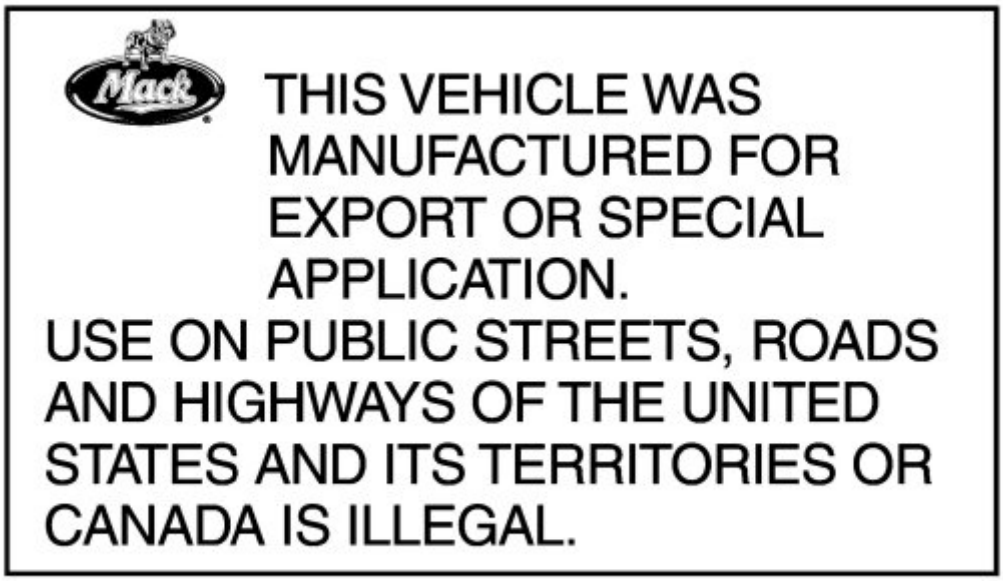
Vehicles destined for sale in the State of Hawaii, Puerto Rico, Guam, the Virgin Islands, the Northern Mariana Islands and American Samoa, while they must conform to applicable FMVSS, do not have to have a windshield defroster as required by FMVSS 103, Windshield Defrosting and Defogging Systems. If a vehicle destined for one of these areas is not MACK assembly plant-equipped with a defroster, a label similar to the label shown in Figure 8 is affixed to the cab near the VEHICLE SAFETY CERTIFICATION LABEL.

Typical Omission of Heater/Defroster Label



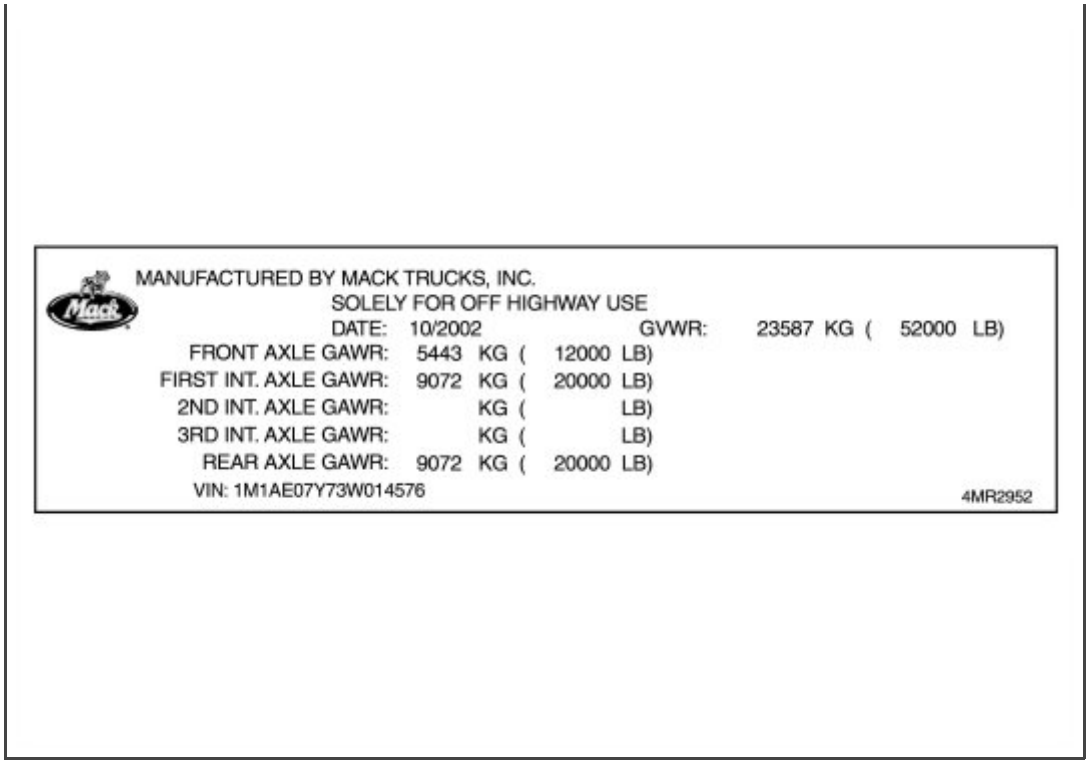
An EXPORT VEHICLE from the MACK assembly plant is not necessarily designed to conform to applicable FMVSS or CMVSS and has the previously noted EXPORT LABELS and an EXPORT/SPECIAL APPLICATION VEHICLE LABEL, similar to the label shown in Figure 9, affixed to the cab.

Typical Export/Special Application Vehicle Label



A SPECIAL APPLICATION VEHICLE from the MACK assembly plants is not necessarily designed to conform to applicable FMVSS or CMVSS and has the previously noted EXPORT/SPECIAL APPLICATION VEHICLE LABEL and an OFF-HIGHWAY VEHICLE IDENTIFICATION LABEL, similar to the label shown in Figure 10, affixed to the cab.

Typical Off-Highway Vehicle Identification Label



THE USE OF AN EXPORT VEHICLE OR SPECIAL APPLICATION VEHICLE ON PUBLIC HIGHWAYS, UNLESS THE VEHICLE HAS BEEN MODIFIED TO CONFORM TO ALL APPLICABLE FEDERAL STANDARDS AND REGULATIONS, IS ILLEGAL.

GENERAL REQUIREMENTS FOR FILLING OUT VEHICLE SAFETY CERTIFICATION OR INFORMATION LABELS

Each label must be filled out completely (use of a typewriter to fill out each label is suggested).

Each label must be affixed in one of the previously noted locations.

A label must not be affixed over top of any other label.

A clear overlay is not required with the partially printed labels (white in color) available through the MACK Parts System.

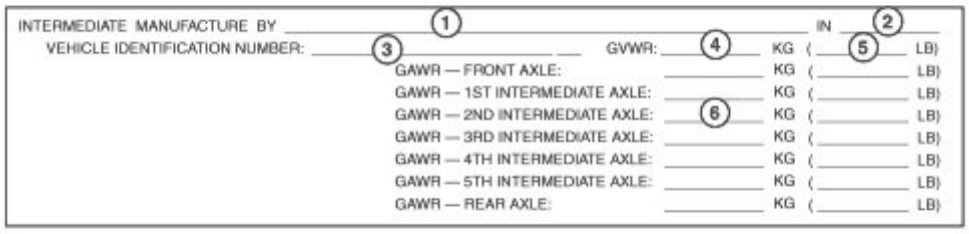
INTERMEDIATE MANUFACTURER REQUIREMENTS — U.S.

In certain instances, it is possible for there to be more than one INTERMEDIATE MANUFACTURER (see previous definition of INTERMEDIATE MANUFACTURER) for a single INCOMPLETE VEHICLE. On and after September 1, 2006, an INTERMEDIATE MANUFACTURER must affix to the cab an INTERMEDIATE MANUFACTURER'S INFORMATION LABEL, similar to the label shown in Figure 11. The INTERMEDIATE MANUFACTURER'S INFORMATION LABEL list the name of the INTERMEDIATE MANUFACTURER, the date of intermediate manufacture, the VIN and the GVWR and the GAWRs of the INCOMPLETE VEHICLE after intermediate manufacture is complete. The label MUST NOT cover up any other label required by Federal regulations. The label MUST NOT be removed or covered up at any time during the vehicle safety certification process.

An INTERMEDIATE MANUFACTURER must ensure that the next manufacturer in the manufacturing chain is provided the IVD. If any of the changes made by the INTERMEDIATE MANUFACTURER affect the validity of the statements in the IVD, the INTERMEDIATE MANUFACTURER must attach an ADDENDUM to the IVD containing its name and mailing address and an indication of all changes that should be made in the IVD to reflect the changes it made to the INCOMPLETE VEHICLE. The INTERMEDIATE MANUFACTURER'S ADDENDUM must also contain a certification by the INTERMEDIATE MANUFACTURER that the statements contained in the ADDENDUM are accurate as of the date of manufacture by the INTERMEDIATE MANUFACTURER and can be used and relied on by any subsequent INTERMEDIATE MANUFACTURER(S) and the FINAL-STAGE MANUFACTURER as a basis for certification.

Note: It is recommended that each INTERMEDIATE MANUFACTURER make and retain a photocopy of the IVD, and ADDENDUM(s) if applicable, for its own files.

Typical U.S. Intermediate Manufacturer's Information Label



FILLING OUT THE U.S. INTERMEDIATE MANUFACTURER'S INFORMATION LABEL

The U.S. INTERMEDIATE MANUFACTURER'S INFORMATION LABEL, similar to Figure 11, must be used and completed as follows: In space (1), insert the INTERMEDIATE MANUFACTURER'S full name (e.g., XYZ Mack Sales and Service, Inc.). In space (2), insert the month and year in which the INTERMEDIATE MANUFACTURER performed the last manufacturing operation on the INCOMPLETE VEHICLE. In space (3), insert the 17- character Vehicle Identification Number (VIN) shown on the INCOMPLETE VEHICLE MANUFACTURER'S INFORMATION LABEL or the IVD. It is recommended that the VIN shown on the VIN label affixed to the cab AND the VIN stamped on the vehicle's frame also be examined to ensure that they are identical. If the INTERMEDIATE MANUFACTURER made any change(s) to the INCOMPLETE VEHICLE which affects its GVWR (e.g., a tire, rim, axle or suspension change[s] or addition[s], the new GVWR in kilograms (KG) should be inserted in space (4), AND the new GVWR in pounds (LB) would be inserted in space (5). If the INTERMEDIATE MANUFACTURER did not make any change(s) to the INCOMPLETE VEHICLE which affects the GVWR of the INCOMPLETE VEHICLE, the GVWR values listed on the INFORMATION LABEL affixed by the previous manufacturer should be inserted in spaces (4) and (5). If the INTERMEDIATE MANUFACTURER made any change(s) to the INCOMPLETE VEHICLE which affects any of the GAWRs of the INCOMPLETE VEHICLE, the new GAWR(s) should be inserted in space (6). If the INTERMEDIATE MANUFACTURER did not make any change(s) to the INCOMPLETE VEHICLE which affects any of the GAWRs of the INCOMPLETE VEHICLE, the GAWR values listed on the INFORMATION LABEL provided by the previous manufacturer should be inserted in space (6).

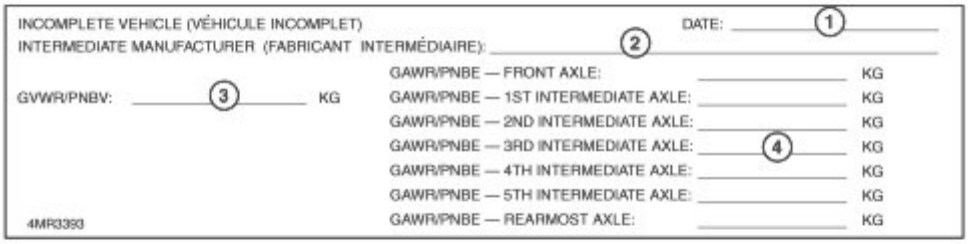
INTERMEDIATE MANUFACTURER REQUIREMENTS — CANADA

In certain instances, it is possible for there to be more than one INTERMEDIATE MANUFACTURER (see previous definition of INTERMEDIATE MANUFACTURER) for a single INCOMPLETE VEHICLE. An INTERMEDIATE MANUFACTURER must attach an ADDENDUM to the IVD, containing its name and mailing address, a clear and precise description of ALL the changes it has made to the INCOMPLETE VEHICLE, and if any of the changes affect the validity of a statement made by the INCOMPLETE VEHICLE MANUFACTURER in the IVD, an indication of the amendments that must be made to those statements to reflect the changes made by the INTERMEDIATE MANUFACTURER. An INTERMEDIATE MANUFACTURER must ensure that the IVD, with its ADDENDUM(s), is provided to the next manufacturer in the manufacturing chain.

In addition to the ADDENDUM to the IVD, an INTERMEDIATE MANUFACTURER must affix to the cab an INTERMEDIATE MANUFACTURER'S INFORMATION LABEL, similar to the label shown in Figure 12, AND a NATIONAL SAFETY MARK LABEL, similar to the label shown in Figure 1 (the labels may be combined into a single label). The NATIONAL SAFETY MARK LABEL must bear the unique authorization number assigned to the INTERMEDIATE MANUFACTURER by Transport Canada. The INTERMEDIATE MANUFACTURER'S INFORMATION LABEL lists the name of the INTERMEDIATE MANUFACTURER, the date of intermediate manufacture, and the

GVWR and the GAWRs of the INCOMPLETE VEHICLE after intermediate manufacture is complete. The label MUST NOT be removed or covered up at any time during the vehicle safety certification process.

Typical Canadian Intermediate Manufacturer's Information Label



FILLING OUT THE CANADIAN INTERMEDIATE MANUFACTURER'S INFORMATION LABEL

A Canadian INTERMEDIATE MANUFACTURER'S INFORMATION LABEL, similar to Figure 12, must be used and completed as follows: In space (1), insert the month and year in which the INTERMEDIATE MANUFACTURER performed its last manufacturing operation on the INCOMPLETE VEHICLE. In space (2), insert the full name of the INTERMEDIATE MANUFACTURER (e.g., XYZ Mack Sales and Service, Inc.). If the INTERMEDIATE MANUFACTURER made any change(s) to the INCOMPLETE VEHICLE which affects its GVWR (e.g., a tire, rim, axle or suspension change[s] or addition[s]), the new GVWR should be inserted in space (3). If the INTERMEDIATE MANUFACTURER did not make any change(s) to the INCOMPLETE VEHICLE which affects the GVWR of the INCOMPLETE VEHICLE, the GVWR value listed on the INFORMATION LABEL affixed by the previous manufacturer should be inserted in space (3). If the INTERMEDIATE MANUFACTURER made any change(s) to the INCOMPLETE VEHICLE which affects any of the GAWRs of the INCOMPLETE VEHICLE, the new GAWR(s) should be inserted in space (4). If the INTERMEDIATE MANUFACTURER did not make any change(s) to the INCOMPLETE VEHICLE which affects any of the GAWRs of the INCOMPLETE VEHICLE, the GAWR values listed on the INFORMATION LABEL provided by the previous manufacturer should be inserted in space (4).

FINAL-STAGE MANUFACTURER REQUIREMENTS

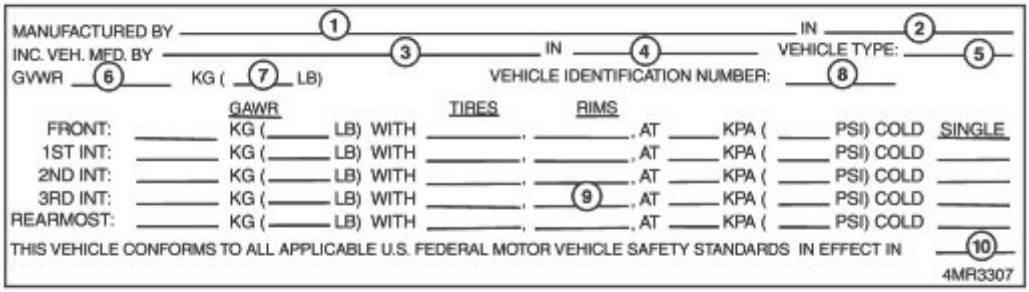
When an INCOMPLETE VEHICLE/CHASSIS-CAB is completed, the FINAL-STAGE MANUFACTURER MUST certify that the COMPLETED VEHICLE conforms to all applicable safety standards BEFORE THE VEHICLE CAN BE DELIVERED TO THE CUSTOMER. Certification to U.S. FMVSS is accomplished by affixing to the cab a FINAL-STAGE MANUFACTURER'S VEHICLE SAFETY CERTIFICATION LABEL similar to the label shown in Figure 13. Certification to Canada MVSS is accomplished by affixing to the cab, BOTH a FINAL-STAGE MANUFACTURER'S VEHICLE SAFETY CERTIFICATION LABEL similar to the label shown in Figure 14, AND a NATIONAL SAFETY MARK LABEL, similar to the label shown in Figure 1 (the labels may be combined into a single label). The NATIONAL SAFETY MARK LABEL must bear the unique authorization number assigned to the INTERMEDIATE MANUFACTURER by Transport Canada.

All other VEHICLE SAFETY CERTIFICATION LABELS and INFORMATION LABELS previously affixed by other manufacturers MUST NOT be obscured by another label or removed from the cab.

For a vehicle destined for sale in the U.S. or any of its territories, the FINAL-STAGE MANUFACTURER should remove the IVD and any ADDENDUM(s) (if applicable) from the vehicle and keep them. For a vehicle destined for sale in Canada, a FINAL-STAGE MANUFACTURER must make an ADDENDUM to the IVD that contains its name

and mailing address, a clear and precise description of ALL the changes that it made to the INCOMPLETE VEHICLE, and must keep the IVD, with its ADDENDUM(s), for not less than 5 years after it completed manufacturing of the vehicle.

Typical U.S. Final-Stage Manufacturer's Vehicle Safety Certification Label



Note: U.S. regulations permit the optional use of specific statements in addition to those shown on the label in Figure 13. Distributors are advised to seek legal counsel in order to determine if the use of these optional statements is desirable (reference 49 CFR Part 567).

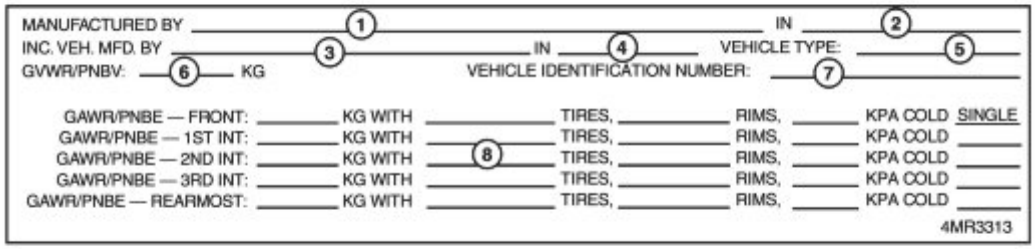
FILLING OUT THE U.S. FINAL-STAGE MANUFACTURER'S VEHICLE SAFETY CERTIFICATION LABEL

A U.S. FINAL-STAGE MANUFACTURER'S VEHICLE SAFETY CERTIFICATION LABEL, similar to Figure 13, must be used and completed as follows: In space (1), insert the full name of the FINAL-STAGE MANUFACTURER (e.g., XYZ Mack Sales and Service, Inc.). In space (2), insert the month and year in which final-stage manufacture was completed. In space (3), insert the full name of the INCOMPLETE VEHICLE MANUFACTURER taken from the IVD or INCOMPLETE VEHICLE MANUFACTURER'S INFORMATION LABEL.

In space (4), insert the month and year of manufacture of the INCOMPLETE VEHICLE shown on the IVD or INCOMPLETE VEHICLE MANUFACTURER'S INFORMATION LABEL. In space (5), insert the VEHICLE TYPE, e.g., TRUCK, TRUCK TRACTOR, FIREFIGHTING VEHICLE. If no changes which affect the GVWR have been made by the FINAL-STAGE MANUFACTURER, the information for spaces (6) and (7) is taken from the IVD or its most recent ADDENDUM, as applicable. If the FINAL-STAGE MANUFACTURER made changes that affects the GVWR listed by the previous manufacturer, new values must be used. In spaces (6) and (7), insert the GVWR in kilograms (KG) AND in pounds (LB), respectively, applicable to the COMPLETED VEHICLE as it will be sold.

In space (8), insert the 17-character Vehicle Identification Number (VIN) shown on the INCOMPLETE VEHICLE MANUFACTURER'S INFORMATION LABEL or the IVD. It is recommended that the VIN shown on the vehicle's VIN label affixed to the cab AND the VIN stamped in the vehicle's frame also be examined to ensure that they are identical. In space (10), insert the month and year previously listed in space (2) OR the month and year previously listed in space (4), OR any month and year in between those two dates. However, since you are certifying that the ENTIRE COMPLETED VEHICLE conforms to ALL APPLICABLE FMVSSs in effect in that month and year, it is recommended that the month and year in which the INCOMPLETE VEHICLE/CHASSIS-CAB was originally manufactured be used, i.e., the date previously listed in space (4). If no changes which affect a GAWR(s) or tire/rim information have been made by the FINAL-STAGE MANUFACTURER, the information for space (9) is taken from the IVD or its most recent ADDENDUM, as applicable. If the FINAL-STAGE MANUFACTURER made changes that affected a GAWR(s) or tire/rim information, new values must be used. In space (9), insert the GAWRs (in BOTH kilograms AND pounds) and associated tire/rim information (tire air pressures in BOTH kilopascals AND pounds per square inch) applicable to the COMPLETED VEHICLE as it will be sold.

Typical Canadian Final-Stage Manufacturer’s Vehicle Safety Certification Label



FILLING OUT THE CANADIAN FINAL-STAGE MANUFACTURER’S VEHICLE SAFETY CERTIFICATION LABEL

A Canadian FINAL-STAGE MANUFACTURER'S VEHICLE SAFETY CERTIFICATION LABEL, similar to the label shown in Figure 14, must be used and completed as follows: In space (1), insert the full name of the FINAL-STAGE MANUFACTURER (e.g., XYZ Mack Sales and Service, Inc.). In space (2), insert the month and year in which the final-stage manufacture was completed. In space (3), insert the full name of the INCOMPLETE VEHICLE MANUFACTURER taken from the INCOMPLETE VEHICLE MANUFACTURER'S INFORMATION LABEL or the IVD.

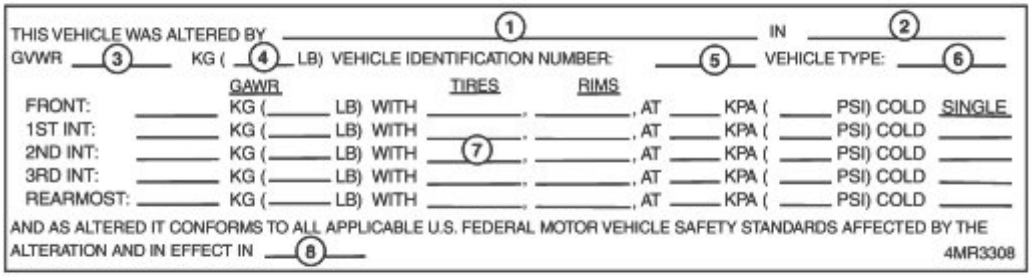
In space (4), insert the month and year of manufacture of the INCOMPLETE VEHICLE shown on the INCOMPLETE VEHICLE MANUFACTURER'S INFORMATION LABEL or the IVD. In space (5), insert the VEHICLE TYPE in BOTH English and French, i.e., “TRUCK/ CAMION” or “TRU/CAM” in the case of a TRUCK, or “TRUCK TRACTOR/CAMION TRACTEUR” or “TT/CT” in the case of a TRUCK TRACTOR. If no changes which affect the GVWR have been made by the FINAL-STAGE MANUFACTURER, the information for space (6) is taken from the IVD or its most recent ADDENDUM, as applicable. If the FINAL-STAGE MANUFACTURER made changes that affected the GVWR listed by the previous manufacturer, new values must be used. In space (6), insert the GVWR applicable to the COMPLETED VEHICLE as it will be sold. If no tire/rim/axle/suspension changes have been made by the FINAL-STAGE MANUFACTURER, this information is taken from the IVD; however, the actual components should be checked to verify that no changes have been made after the INCOMPLETE VEHICLE left the control of the INCOMPLETE VEHICLE MANUFACTURER. In space (7), insert the 17-character VIN shown on the IVD. It is recommended that the VIN shown on the vehicle's VIN label affixed to the cab AND the VIN stamped in the vehicle's frame also be examined to ensure that they are identical. If no changes which affect a GAWR(s) or related tire/rim information have been made by the FINAL-STAGE MANUFACTURER, the information for space (8) is taken from the IVD or its most recent ADDENDUM, as applicable. If the FINAL-STAGE MANUFACTURER made changes that affected a GAWR(s) or tire/rim information, new values must be used. In space (8), insert the GAWRs and tire/rim information applicable to the COMPLETED VEHICLE as it will be sold.

VEHICLE ALTERER REQUIREMENTS

It is the responsibility of an ALTERER to ensure that the ALTERED VEHICLE still FULLY complies with ALL applicable safety standards and regulations, and that any changes that affect the GVWR or any GAWR(s) are reflected in revised ratings as necessary. The ALTERER must affix to the cab an ALTERER'S VEHICLE SAFETY CERTIFICATION LABEL, similar to the label shown in Figure 15, in order to comply with U.S. regulations. In order to comply with Canadian regulations, the ALTERER must affix to the cab BOTH an ALTERER'S VEHICLE SAFETY CERTIFICATION LABEL, similar the label shown in Figure 16, AND a NATIONAL SAFETY MARK LABEL, similar to the label shown in Figure 1 (however, the labels may be combined into a single label). The NATIONAL SAFETY MARK LABEL must bear the unique authorization number assigned to the ALTERER by Transport Canada.

None of the previously applied VEHICLE SAFETY CERTIFICATION LABELS or INFORMATION LABELS may be removed since the ALTERER'S VEHICLE SAFETY CERTIFICATION LABEL is an ADDITIONAL label, NOT a replacement label. Also, this label must NOT be installed over any existing VEHICLE SAFETY CERTIFICATION LABEL or INFORMATION LABEL.

Typical U.S. Alterer's Vehicle Safety Certification Label

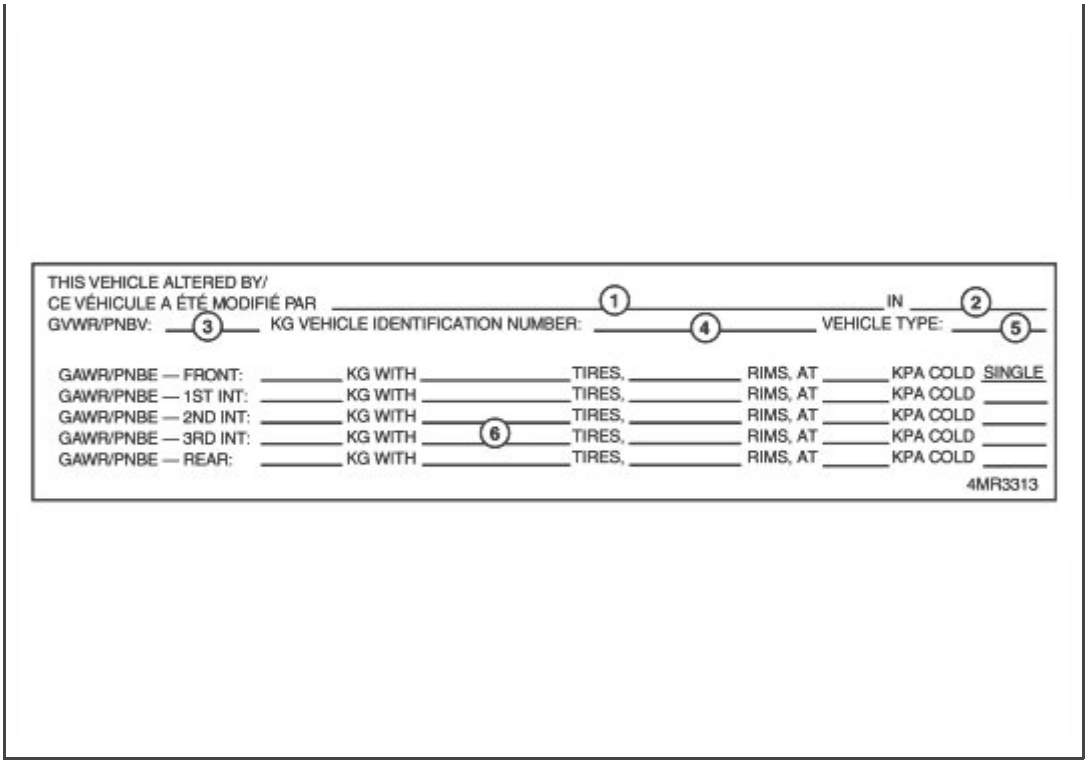


FILLING OUT THE U.S. ALTERER'S VEHICLE SAFETY CERTIFICATION LABEL

A U.S. ALTERER'S VEHICLE SAFETY CERTIFICATION LABEL, similar to the label shown in Figure 15, must be used and completed as follows: In space (1), insert the full name of the ALTERER (e.g., XYZ Mack Sales and Service, Inc.). In space (2), insert the month and year in which the alterations were completed. In spaces (3) and (4), if the ALTERER made a change(s) which affected the GVWR, the new GVWR in kilograms (KG) AND in pounds (LB), respectively, must be inserted. If the change(s) to the vehicle did NOT affect the GVWR, e.g., if only the VEHICLE TYPE was changed from TRUCK TRACTOR to TRUCK, then the GVWR from the previous VEHICLE SAFETY CERTIFICATION LABEL should be inserted. In space (5), insert the 17-character VIN shown on the previous VEHICLE SAFETY CERTIFICATION LABEL. It is recommended that the VIN shown on the vehicle's VIN label affixed to the cab AND the VIN stamped in the vehicle's frame also be examined to ensure that they are identical. In space (6), if the ALTERER has changed the VEHICLE TYPE, e.g., making a fully vehicle safety certified TRUCK TRACTOR into a TRUCK, then the new VEHICLE TYPE should be inserted. However, if the changes did NOT affect the VEHICLE TYPE, then the VEHICLE TYPE from the previous VEHICLE SAFETY CERTIFICATION LABEL should be inserted.

In space (8), insert a month and year which is no earlier than the month and year in which the vehicle was originally manufactured, and no later than the month and year in which the alterations were completed, i.e., the date listed in space (2). However, since you are certifying that the ENTIRE ALTERED VEHICLE conforms to ALL applicable FMVSSs in effect in that month and year, it is recommended that the month and year in which the COMPLETED VEHICLE was manufactured be used. If an ALTERER made no changes that affected a GAWR(s) or related tire/rim information, information for space (7) is taken from the COMPLETED VEHICLE SAFETY CERTIFICATION LABEL or the FINAL-STAGE MANUFACTURER'S VEHICLE SAFETY CERTIFICATION LABEL, as applicable. If the ALTERER made changes that affected a GAWR(s) or related tire/rim information, new values must be used. In space (7), insert the GAWRs (in BOTH kilograms AND pounds) and tire/rim information (tire air pressure in BOTH kilopascals AND pounds per square inch) applicable to the altered vehicle as it will be sold.

Typical Canadian Alterer's Vehicle Safety Certification Label



FILLING OUT THE CANADIAN ALTERER'S VEHICLE SAFETY CERTIFICATION LABEL

A Canadian ALTERER'S VEHICLE SAFETY CERTIFICATION LABEL, similar to the label shown in Figure 16, must be used and completed as follows: In space (1), insert the full name of the VEHICLE ALTERER (e.g., XYZ Mack Sales and Service, Inc.). In space (2), insert the month and year in which the alterations were completed. In space (3), if the ALTERER made a change(s) which affected the GVWR, the new GVWR in kilograms (KG), must be inserted. If the change(s) to the vehicle did NOT affect the GVWR, e.g., if only the VEHICLE TYPE was changed from TRUCK TRACTOR to TRUCK, then the GVWR from the previous VEHICLE SAFETY CERTIFICATION LABEL should be inserted. In space (4), insert the 17-character VIN shown on the previous VEHICLE SAFETY CERTIFICATION LABEL. It is recommended that the VIN shown on the VIN label affixed to the cab AND the VIN stamped in the vehicle's frame also be examined to ensure that they are identical.

In space (5), if the ALTERER has changed the VEHICLE TYPE, e.g., making a fully vehicle safety certified TRUCK TRACTOR into a TRUCK, then the new VEHICLE TYPE in BOTH English and French ("TRUCK/CAMION" or "TRU/CAM" in the case of a TRUCK, or "TRUCK TRACTOR/CAMION TRACTEUR" or "TT/CT" in the case of a TRUCK TRACTOR) should be inserted. However, if the change(s) did NOT affect the VEHICLE TYPE, then the VEHICLE TYPE from the previous VEHICLE SAFETY CERTIFICATION LABEL should be inserted. If an ALTERER made no changes that affected a GAWR(s) or related tire/rim information, information for spaces (6) is taken from the COMPLETED VEHICLE SAFETY CERTIFICATION LABEL or the FINAL-STAGE MANUFACTURER'S VEHICLE SAFETY CERTIFICATION LABEL, as applicable. If the ALTERER made changes that affected a GAWR(s) or related tire/rim information, new values must be used. In space (6), insert the GAWRs (in kilograms) and tire/rim information (tire air pressure in kilopascals) applicable to the altered vehicle as it will be sold.

Issued by

Technical Service