

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On January 5, ~~2008~~, 2012 Kovatch Mobile
Equipment Corp. [MFR] decided that (a defect which relates to motor
vehicle safety) ~~(a noncompliance with Federal Motor Vehicle Safety Standard No. XXXXXXXX)~~ exists in the
motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety
Administration in accordance with 49 CFR Part 573 **Defect and Noncompliance Responsibility and**
Reports.

Date this report was prepared: January 9, 2012

Furnish the manufacturer's identification code for this recall (if applicable): L-02

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Kovatch Mobile Equipment Corp., One Industrial Complex, Nesquehoning, PA 18240

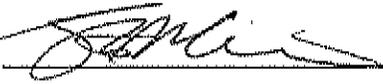
Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Jack Terefinko, Senior Director - Engineering

Telephone Number: (570) 669-5154 Fax No.: (570) 669-9966

Name and Title of Person who prepared this report.
Steven M. Cormier, General Counsel

Signed:



¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or by E-Mail to RMD.ODI@dot.gov.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): KME Model Years Involved: 2010-2011 Model(s): Predator, Predator SS, Predator Panther and Predator XL

Production Dates: Beginning: 3/1/2010 Ending: 10/10/2011

VIN Range: Beginning: 1K9AF6483BN Ending: 1K9AF4287CN
Fire fighting

Vehicle Type: Apparatus Bodystyle: Pumper, Rescue and Aerial

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

The notification involves the above-referenced vehicles that have a Meritor WABCO Electronic Stability Control (ESC) system installed. Meritor WABCO is recalling (Recall No. 11E039000) the ESC modules that are part of the system.

Make(s): _____ Model Years Involved: _____ Model(s): _____

Production Dates: Beginning: _____ Ending: _____

VIN Range: Beginning: _____ Ending: _____

Vehicle Type: _____ Bodystyle: _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): _____ Model Years Involved: _____ Model(s): _____

Production Dates: Beginning: _____ Ending: _____

VIN Range: Beginning: _____ Ending: _____

Vehicle Type: _____ Bodystyle: _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles manufactured during that time period. 23%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Model	Year	Number of Vehicles Potentially Involved
Predator		48
Predator SS		14
Predator Panther		6
Predator XL		10

Total Number Potentially Affected by the Recall: 78

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 23%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

Meritor WABCO notified Kovatch Mobile Equipment Corp. of its recall of all ESC modules supplied to Kovatch since the first modules were shipped to Kovatch in 2010. Kovatch is, therefore, recalling all vehicles equipped with ESC modules manufactured by Meritor WABCO prior to October 10, 2011.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

Per NHTSA Campaign ID 11E039000, Meritor WABCO is recalling certain electronic stability control (ESC) modules with Part Numbers 446 065 020 0, 400 850 195 0, 446 065 027 0, and 400 850 185 0, shipped to a variety of North

American vehicle manufacturers from August 2005 through September 2011. Under certain road and driving conditions,

vehicle body roll and road inclination characteristics may adversely affect the slip angle calculation of the ESC system. This might cause the ESC to falsely perceive an over-steering situation and, therefore, apply the outer wheel brake on the front axle until the vehicle is perceived to be stable. This unnecessary brake intervention may pull the vehicle out of the curve

Describe the cause(s) of the defect or noncompliance condition. if the driver does not counter steer to keep the vehicle on its intended path.

The software algorithm in the ESC module that calculates the vehicle's slip angle.

Describe the consequence(s) of the defect or noncompliance condition.

If the driver is slow to react during the ESC intervention, the vehicle may deviate from the intended line of travel,

increasing the risk of a crash.

Identify any warning which can (a) precede or (b) occur.

The vehicle pulls to the outside of the curve during maneuvers on very tight high banked switch back turns.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Meritor WABCO, 2135 West Maple Road, Troy, Michigan 48084.

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Patrick Kealy, Sr. Manager - Quality Systems (248-655-2050)

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

6. On or about January 5, 2012, Kovatch Mobile Equipment Corp. received notification from Meritor WABCO of
the recall of the ESC modules supplied to Kovatch for installation in Kovatch vehicles.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This 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 the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer'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 the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

Kovatch Mobile Equipment Corp. is working with Meritor WABCO and will replace the ESC module free of charge to
the owner/customer.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

A new module with updated software is being provided. The updated software eliminates the condition.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

Part number on updated unit is different to reflect the software change. Recalled unit was Part #ESC3, and the new unit is Part #ESC5.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

Production remedy identical to recall condition remedy. Production date remedy was January 2012.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Kovatch Mobile Equipment Corp. expects to notify all affected customers on or before June 15, 2012. The

Generation 5 Control Modules are currently available from Meritor WABCO.

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.