



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

**MAY 12 2011**

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via Certified Mail and Email**

Mr. Ken Hendrickson  
VP Global Manufacturing  
Williams Controls, Inc.  
14100 SW 72<sup>nd</sup> Avenue  
Portland, OR 97224

NVS-215aa  
EQ11-003  
11V-255

**Subject: Request for List of Purchasers**

Dear Mr. Hendrickson:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 11V-255. In a letter dated April 26, 2011, Pierce Manufacturing, Inc. (Pierce) notified the NHTSA that it had decided certain Pierce fire trucks, manufactured between June 22, 1999, and May 12, 2008, contain a safety related defect. Pierce stated that certain model year 1999 through 2008 Arrow XT, Dash, Lance, and Enforcer vehicles contain a Williams Controls, Inc. (Williams Controls) suspended electronic accelerator pedal that may become bent after repeated use with excessive force. If the pedal arm bends far enough, the pedal may contact the cab floor without warning and stick in the full throttle position. If the accelerator pedal becomes stuck, the operator may lose control of the vehicle increasing the risk of a crash. NHTSA assigned recall number 11V-255 to this matter.

The purpose of this request is to obtain a list of purchasers that were sold these suspended electronic accelerator pedals so they are made aware of this safety recall and are able to determine the need for any similar safety recall. Accordingly, we require the following information:

1. Provide a list of all customers that received the same or similar Williams Controls suspended electronic accelerator pedals and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date. For any such customers, please also explain why or what about the equipment is the same or similar (e.g., same design specifications, etc.) as distinguished from other accelerator pedals Williams Controls may have manufactured either for Pierce or other customers.



You must respond in writing to this letter. This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitutes confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ11-003**. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,



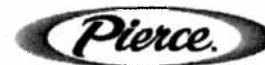
Jennifer T. Timian  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosure

**PIERCE MANUFACTURING, INC.**

AN OSHKOSH CORPORATION COMPANY · ISO 9001 CERTIFIED

2600 AMERICAN DRIVE  
POST OFFICE BOX 2017  
APPLETON, WISCONSIN 54912-2017  
920-832-3000 · FAX 920-832-3208



April 28, 2011

Jennifer Timian (NVS-215)  
Chief of Recall Management  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington DC 20590

**AMENDED**

Vehicle Recall: **Accelerator Pedal**  
**Pierce Recall Number – 74B215**

Dear Ms. Timian:

Pierce has decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below. We therefore furnish notification to the National Highway Traffic Safety Administration, in accordance with 49 CFR Part 573, Defect and Noncompliance Reports.

**1. Name of Manufacturer and Corporate contact:**

Pierce Manufacturing Inc.  
David Archer, Director of Engineering  
Phone: 920 832-3513  
FAX: 920 832-3526  
E-Mail: darcher@piercemfg.com

**2. Identification of Vehicle Classification:**

Make:	Pierce
Model Years Involved:	Dash & Lance: 1999 - 2008 Enforcer: 2000 - 2008 ArrowXT: 2003 - 2008
Models:	ArrowXT, Dash, Lance, Enforcer
Mfg. Date Beginning:	06/22/1999
Mfg. Date Ending:	05/12/2008

**3. Number of Potentially Affected Vehicles:** 4446 total; 4409 US & 37 Canada

**4. Estimated Percentage of Vehicles Containing the Defect:** 100 %

**5. Description of the Defect:** Certain Pierce fire apparatus may be equipped with a suspended electronic accelerator pedal. After repeated use with excessive force, the accelerator pedal arm may bend and cause the foot pedal to move closer to the floor. If the pedal arm bends far enough, the foot pedal may contact the cab floor without warning and stick in the full throttle position. If an accelerator pedal stick occurs, the operator may lose control of the vehicle and a crash may occur.

**6. Chronology of Principal Events:**

November 8, 2005: Milwaukee Fire Department reported accelerator pedal sticks on Pierce Dash job number 14360, MY 2003 and job number 15932, MY 2004. No reported injuries.

November 2005 – March 2006:

Pierce conducted an exhaustive study of the accelerator pedal stick issue with the Milwaukee Fire Department. Additional fire apparatus from other Pierce fire truck owners were also inspected. In addition R&D testing was done to understand the mode of failure. Williams Controls, the accelerator pedal manufacturer, was contacted to seek assistance for the bent pedal arm issue.

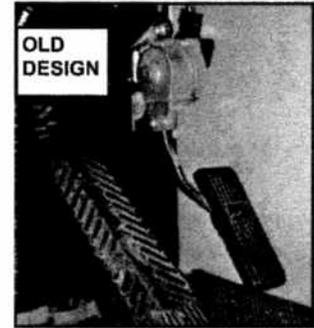
The joint conclusion of Williams Controls and Pierce was the accelerator pedal arm was being bent as a result of excessive abuse. Pierce recognized that owners with bent pedal arms would need an accelerator pedal upgrade kit. Williams Controls developed a fabricated pedal arm that was able to withstand the abusive forces generated by some fire departments.

The Pierce safety committee agreed the bent pedal arms were caused by aggressive abuse that was beyond the reasonable expectation for the accelerator pedal.

March 8, 2011: Tucson Fire Department reported an accelerator pedal stick on a Pierce 1996 Enforcer, job number 17411-05. No reported injuries.

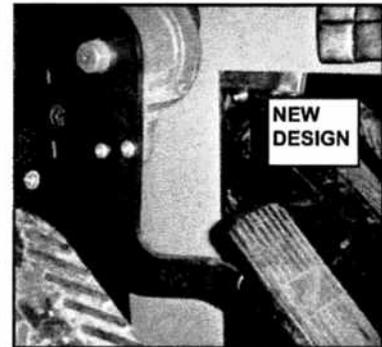
April 1, 2011: Detroit Fire Department reported accelerator pedal sticks on Pierce Dash job number 13878, MY 2002 and job number 15923, MY 2005. No reported injuries.

April 20, 2011: As a result of recent accelerator pedal stick occurrences, the Pierce safety committee agreed to issue a NHTSA Part 573 Defect Report.



7. **Corrective Action:** Remove the existing accelerator arm and install a redesigned fabricated pedal arm. The fabricated pedal arm is a direct replacement for the existing round bar pedal arm.

Production vehicles were upgraded to the fabricated pedal arm design on vehicles shipped on or about May 2008. The production fabricated pedal arm design is identical to the recall remedy.



8. **Representative Notices:** Notices will be sent at a later date.

Sincerely,  
Pierce Manufacturing, Inc.

David Archer  
Director of Engineering