

2600 AMERICAN DRIVE  
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February 22, 2013

Nancy Lewis (NVS-215)  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington DC 20590

Vehicle Recall: **TriMark Inner Door Handle Spring  
Pierce Recall Number – 74B237**

Dear Ms. Lewis:

Pierce has determined that a potential safety defect exists with the inner door handles on the doors of certain Pierce fire apparatus. 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, Vice President 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: 2007, 2008, 2009 and 2010  
Models: Velocity and Impel  
Mfg. Date Beginning: 06/06/2007  
Mfg. Date Ending: 10/30/2010

**3. Number of Potentially Affected Vehicles:** 1275 (1237 U.S., 38 Canada)

**4. Estimated Percentage of Vehicles Containing the Defect or Noncompliance:** 12%

**5. Description of the defect or noncompliance:**

The legs of the torsion spring on TriMark inner door handles may be too short in some handles resulting in the legs coming out of their retention pockets. This may increase the potential for the door to be opened inadvertently.

**6. Chronology of Principal Events:**

1/3/13 - Pierce Mfg. received notice of an incident where the crew door of a fire truck opened inadvertently during operation.

1/8/13 - Pierce Mfg. received a second notice of an incident where the crew door of a fire truck opened inadvertently.

1/11/13 - Initiated investigation of inner door handles with TriMark Corporation.

1/14/13 - TriMark revealed that a design change was initiated in June of 2010 to increase the spring leg length of inner handle torsion spring.

1/22/13 - TriMark and Pierce met with representatives of the Greenville Fire Department to understand better the circumstances surrounding their accidental door opening.

2/18/13 - Initial round of more severe inner handle cycle testing completed. Results validated the increased leg length revision made in June 2010 and confirmed the original spring leg length susceptibility to pulling out of the retention pockets.

2/18/13 - TriMark and Pierce representatives met with representatives of the Sayville Fire Department to review the circumstances surrounding their accidental door opening reported on 1/3/13.

2/21/13 – Velocity/Impel inner door handle investigation concludes that inner door handles with the original length torsion spring legs are susceptible to the spring legs coming out of their retention pockets. The loss of this spring tension in the latch system makes the inner handles much easier to actuate which can result in accidental door openings.

2/22/13 - After reviewing all the field reports and test data, Pierce has determined that a potential safety defect exists with the inner door handles on the rear doors of certain Pierce fire apparatus.

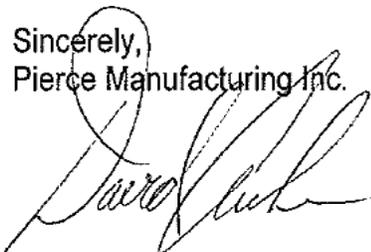
**7. Corrective Action:**

Remove and replace all inner door handles and rear door linkage rods in Pierce Velocity and Impel model trucks that were shipped between 6/6/2007 and 10/30/2010.

Remedy will be performed by authorized Pierce dealers.

**8. Representative Notices:** Owner and dealer notifications are pending.

Sincerely,  
Pierce Manufacturing Inc.



David Archer  
Vice President of Engineering