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By Recall Management Division at 11:04 am, Mar 12, 2013

Caterpillar Inc.
100 NE Adams Street
Peoria, Illinois 61629-9240

CERTIFIED MAIL

January 28, 2013

Associate Administrator
Office of Defects Investigation Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Caterpillar Inc. ("Caterpillar") is the brand name owner of certain on-highway heavy duty vehicles manufactured by Navistar, Inc. ("Navistar"). Caterpillar has been notified by Navistar of a noncompliance with FMVSS 108. Caterpillar has reviewed the information provided by Navistar and has concluded that the noncompliance applies to certain Caterpillar brand vehicles. In accordance with the requirements of the National Traffic and Motor Vehicle Safety Act and the procedure prescribed in 49 CFR 573.6, enclosed is Caterpillar's Noncompliance Information Report related to those vehicles.

Please contact me if there are additional requirements regarding this notification.

Very truly yours,

Thomas S. Lane
On Highway Compliance Manager
Product Safety & Compliance

Phone (309) 675-6496
Fax (309) 636-2911

TSLane
Rev00 – 1-28-13

(1) *MANUFACTURER [Part 573.6(c)(1)]*

Navistar

and BRAND OWNER [Part 573.6(c)(1)]

Caterpillar Inc.
100 N.E. Adams St.
Peoria, IL. 61629-9240

(2) *IDENTIFICATION OF VEHICLES [Part 573.6(c)(2)]*

- Vehicle Type /Make / Model / Model Year Involved:
 - Commercial Truck / Caterpillar ® / CT660 / 2012 and 2014
- Vehicle Manufacturing Dates:
 - 10/31/2011 thru 1/23/2013

(3) *VEHICLE POPULATION INVOLVED [Part 573.6 (c)(3)]*

Type	Make	Model	Number of Suspect Vehicles	
			United States	Canada
Commercial Truck	Caterpillar	CT660	49	5

(5) *PERCENTAGE OF VEHICLES ESTIMATED TO CONTAIN THE NONCOMPLIANCE [Part 573.6 (c)(4)]*

- 100% of the identified vehicles

(6) *DESCRIPTION OF NONCOMPLIANCE [Part 573.6 (c)(5)]*

- Certain side marker lamps and/or reflective tape were not applied to these vehicles, which have a length of 30 feet or longer, as required by FMVSS 108 S6, S7.4, S8.1 and Table I-a.

(7) *INFORMATION CONSIDERED IN THE DETERMINATION OF A NONCOMPLIANCE [Part 573.6 (c)(7)]*

- Navistar notified Caterpillar of this potential noncompliance on 1/16/13.
- Subsequent communications were held between Caterpillar and Navistar to understand the FMVSS requirements at issue and the cause for the noncompliance.

- Navistar explained that during the new product design, mirrors were removed from the door and added onto the cowl, and the original cowl light was displaced. The new product release process for the side lighting and reflective tape requirements in FMVSS 108 S6, S7.4, S8.1 and Table I-a were not identified through launch and production of vehicles of 30' ft length or longer.
- On 1/23/2012 Caterpillar reviewed Navistar's information and determined this noncompliance was applicable to the identified Caterpillar brand vehicles.

(8) PROGRAM TO REMEDY NONCOMPLIANCE [Part 573.6 (c)(8)]

- A recall to rectify the noncompliance will be conducted by Caterpillar.
- Caterpillar is waiting for Navistar to identify the remedy parts kit, process and availability.

(9) PLAN FOR REIMBURSEMENT [Part 573.6 (c)(8)(i)]

- Caterpillar will perform this service free of charge.
- If a customer has had their vehicle repaired for this condition prior to receipt of notice and incurred any costs, they will be eligible for reimbursement by contacting Caterpillar.

(10) SCHEDULE FOR RECALL NOTIFICATION [Part 573.6 (c)(8)(ii)]

- The schedule for recall notification is based on the availability of the remedy from Navistar, which is not known at this time.

(11) MANUFACTURER'S CAMPAIGN NUMBER [Part 573.6 (c)(11)]

- Caterpillar will use the recall number assigned by NHTSA.