

PIERCE MANUFACTURING, INC.

AN OSHKOSH CORPORATION COMPANY · ISO 9001 CERTIFIED

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May 16, 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: **Outer Door Handle Spring
Pierce Recall Number – 74B242**

Dear Ms. Lewis:

Pierce has determined that a noncompliance exists with the outer 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 through 2013
Models: Velocity, Impel, and Dash CF
Mfg. Date Beginning: 06/06/2007
Mfg. Date Ending: 05/17/2013

3. Number of Potentially Affected Vehicles: 2029 (1965 U.S., 63 Canada, 1 Mexico)

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

5. Description of the defect or noncompliance:

The springs in the outer door handles are not of sufficient stiffness to pass the FMVSS 206 30G impulse requirement in the +Y direction. In the event of a 30G impact in the +Y direction the outer door handle may actuate enough to trip the door latch and allow the door to open.

6. Chronology of Principal Events:

3/7/13 - Pierce Mfg. performed a static 30G calculation per SAE J839 recommended practice on the overall door latch system for Velocity and Impel model chassis. The results indicated issues with passing the 30G impulse load for both the inner handles and outer handles.

3/28/13 – Discrepancies were identified in the analysis of 3/7/13. These were corrected and a detailed dynamic simulation analysis was initiated per SAE J839.

5/14/13 - After reviewing all the dynamic simulation analyses reports and data, Pierce has determined that a FMVSS 206 noncompliance issue exists with the outer door handles on Velocity, Impel, and Dash CF model Pierce fire apparatus.

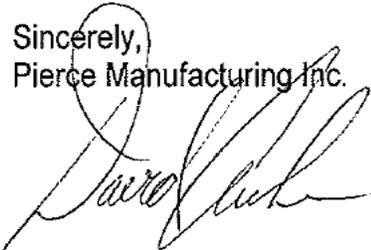
7. Corrective Action:

Remove and replace the linear actuator spring with a stiffer spring on all Pierce Velocity, Impel, and Dash CF model trucks that were shipped between 6/6/2007 and 5/17/2013.

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