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13V-308
(4 pages)
R. L. Van Laar
Compliance Manager

July 10, 2013

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington D.C. 20590

Subject: Noncompliance Information Report (Initial)

Dear Associate Administrator:

This noncompliance information report is submitted pursuant to Part 573.6(a). Navistar is still determining the vehicles involved in this noncompliance. Navistar plans to have the affected vehicles identified and reported to NHTSA by July 31, 2013.

(1) *MANUFACTURER'S NAME* [Part 573.6(c)(1)]

- Navistar, Inc. on behalf of IC Bus, LLC, a wholly owned subsidiary.

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

- Vehicle Type / Make / Model / Model Year Involved:
 - School Bus / IC Bus / CE / Model Years under investigation
 - Other models and model years to be determined
- Vehicle Manufacturing Dates:
 - Undetermined at this time.
- Other Identification Necessary to Describe Vehicles:
 - None

(3) *COMPONENT MANUFACTURER* [Part 573.6(c)(2)(iv)]

- The passenger seats are assembled by IC Bus
- This report relates to the foam padding supplied by Foam Rubber LLC as part of the seat assembly. Contact information is:

Martin Gonzalez
COO
Foam Rubber LLC
2000 Troy Ave.

New Castle, IN 47362
 (765) 521-2000

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

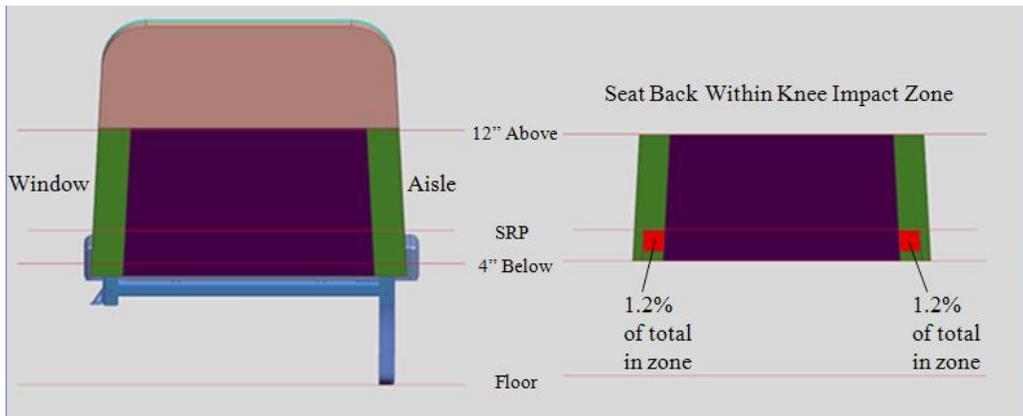
- Certain IC Bus passenger seats. Population to be determined.

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

- Undetermined at this time.

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

- Certain school bus passenger seats do not meet the full requirements of FMVSS 222 as prescribed in paragraph S5.3.2.2 which states when any point on the rear surface of that part of a seat back or restraining barrier within any zone specified in S5.3.2.1 is impacted from any direction at 4.9 m/s (11MPH) by the knee form specified in S6.7, the resisting force of the impacted material shall not exceed 2,669 N (600 lbs.) and the contact area on the knee form surface shall not be less than 1,935 mm² (3 in²).
- The resisting force of the impacted material did exceed 2,669 N (600 lbs.) in two small areas on the outside lower corner of the knee impact zone). Navistar and third party test results of exemplar seats are shown in the exhibit and table below:



Window Impact Loads (lbs)			Aisle Impact Loads (lbs)		
Navistar	3rd party	MGA	Navistar	3rd party	MGA
644	655	767	543	322	587
652	658	819	567	370	657
771	707	970	573	400	827
813	828	1174	575	450	836
855		1244	576	465	933
876		1326	623	487	968
948			655	505	
957			662	508	
986			680	526	
994			729	532	
1069			788		

(7) CHRONOLOGY OF PRINCIPAL EVENTS WHICH LED TO DETERMINATION OF A SAFETY DEFECT or TEST RESULTS THAT LED TO DETERMINATION OF NONCOMPLIANCE [Part 573.6 (c)(6)/(7)]

- 05/23/2013 – IC Bus receives notice of failed compliance testing of the knee impact requirement FMVSS 222 Knee Impact Force testing performed by MGA on behalf of NHTSA.
- 05/28/2013 – IC Bus visits MGA test lab to review test results and compliance testing reports and verify test methods.
- 06/14/2013 – IC Bus initially performs FMVSS 222 knee impact force testing in effort to duplicate the MGA test. The resisting force of the impacted material when tested measured 4759.5 N (1070 LBS) and begins investigation into root cause. It was determined that the foam in the lower corner was not built to print dimensions on the suspect seats.
- 06/18/2013 – Navistar contained the issue by having the supplier change their manufacturing process to build the seat foam to print dimensions.
- 06/24/2013 – Completed testing of several seats at a third party test labs. Of the seats tested, some were below the maximum force requirement and some exceeded the maximum requirement in the lower corners of the knee impact zone, reference chart above.
- 07/02/2013 – Navistar meets to review test results and determines that non-compliance to FMVSS 222, paragraph S5.3.2 exists in certain passenger seats.

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

- The remedy is still under investigation.

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

- Navistar's plan for reimbursement of pre-notification remedies, on file and dated 1/5/09, applies and instructions will be included if notification is appropriate.

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

- Navistar will file a petition for an exemption from the recall requirements of the Act on the basis that non-compliance is inconsequential as it relates to motor vehicle safety pursuant to part 573.6 (8) (iii).

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

- Campaign number has not been assigned at this time.

The undersigned should be contacted for any additional information regarding this recall on (331) 332-1590.

Sincerely,



R. L. Van Laar

Compliance Manager
Navistar, Inc.

RV: FI