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By Recall Management Division at 8:23 am, Sep 03, 2013

P: 331-332-1590  
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August 30, 2013

Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington D.C. 20590Subject: Noncompliance Information Report (Initial)  
Navistar Campaign 13513

Dear Associate Administrator:

This noncompliance information report is submitted pursuant to Part 573.6(a).

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

- Navistar, Inc. on behalf of IC Bus, LLC.

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

- Vehicle Type / Make / Model / Model Year Involved:
  - School Bus / IC Bus / CE / 2013 and 2014
  - School Bus / IC Bus / RE / 2013
- Vehicle Manufacturing Dates:
  - 08/20/2012 thru 09/04/2012
- Other Identification Necessary to Describe Vehicles:
  - Seat barriers produced by HSM Solutions. Part number 2210544C5

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

- This report relates only to a component supplied by HSM Solutions. Contact information is:

Mike Woods  
Test and Validation Engineering Manager  
HSM Transportation Solutions  
4925 State Line Rd.  
Fort Smith, AR, USA 72916  
1-479-648-8320

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

Type	Make	Model	Number of Suspect Vehicles		
			United States	Canada	Export
School Bus	IC	CE	63	7	0
School Bus	IC	RE	7	0	0

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

- It is estimated that (23%) of the vehicles in suspect population could have the defect.

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

- Certain school bus restraining barriers may not meet the full requirements of FMVSS 222 as prescribed in paragraph S5.2.1 which states each vehicle shall be equipped with a restraining barrier forward of any designated seating position that does not have the rear surface of another school bus passenger seat within 610 mm (24 inches) of its seating reference point, measured along a horizontal longitudinal line through the seating reference point in the forward direction, when force is applied to the restraining barrier in the same manner as specified in S5.1.3.1 through S5.1.3.4 for seating performance tests, S5.2.3 (e): restraining barrier components shall not separate at any attachment point. The subject barriers may have a suspect weld at the base of the barrier frame that may not comply with the above test.

*(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)]*

- 5/24/2013 – IC Bus receives notice of failed compliance testing of the seat barrier requirement FMVSS 222 Seat Barrier Impact Force testing performed by MGA on behalf of NHTSA.
- 5/27/2013 IC Bus and HSM visits MGA lab to review test results and compliance testing and verify test methods.
- 6/13/2013 – HSM initiates testing to replicate failure and begins investigation into root cause.
- 6/19/2013 – HSM investigates root cause and discovers that as a result of a plant power failure the barrier frame robot crashed which may have had an impact on weld integrity.
- 6/26/2013 – IC Bus and HSM visit MGA a second time to inspect barrier weld integrity and confirm the weld was mislocated, which correlated with the HSM plant downtime event.
- 7/2/2013 – HSM reviewed manufacturing data identifies a significant plant downtime event on 8/8/2012 and finds that parts were not tested immediately after event to verify conformance.
- 7/10/2013 – HSM initiates plant investigation to determine potential affected units.
- 7/11/2013 – IC Bus and HSM meet with NHTSA discussing final interpretation that a separation is a non-compliance.

- 8/6/2013 – Tulsa plant receives NHTSA test inquiry PE-222-130525 requesting additional data related to the barrier test.
- 8/7/2013 – IC Bus and HSM identify one lot of barriers that could be impacted by the mislocated weld due to the downtime event mentioned above.
- 8/14/2013 – IC Bus and HSM complete review of all barrier lots for the last two years and determine that the one lot identified above is the only suspect lot.
- 8/22/13 – IC Bus and HSM finalize the suspect vehicle population based on the suspect barrier lot.
- 8/26/2013 – Navistar declares a safety recall.

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

- The remedy will involve replacement of all potentially suspect barrier frames.

*(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 in the customer notification.

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

- The schedule for recall notification is based on the availability of repair parts which cannot be determined at this time. However, a plan to mail an interim owner notification letter may be developed if the final remedy will not be available before 10/30/2013.

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

- 13513

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