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R. L. Van Laar
Compliance Manager

December 18, 2013

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

Subject: Noncompliance Information Report (Initial)
Navistar Campaign 13521
NHTSA Campaign 13E-061

Dear Associate Administrator:

This noncompliance information report is submitted pursuant to Part 573.6(a). This noncompliance report relates to the 573 letter titled, L9 Non Compliance Report – rev1 submitted to NHTSA November 19, 2013 by Indiana Mills and Manufacturing Inc. (IMMI) and assigned NHTSA campaign number 13E-061.

(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:
 - Commercial Bus / IC Bus / CE / 2014 and 2015
 - Commercial Bus / IC Bus / RE / 2014
- Vehicle Manufacturing Dates:
 - 08/12/2013 thru 11/14/2013
- Other Identification Necessary to Describe Vehicles:
 - Driver seats equipped with certain IMMI seat belt assemblies with L9 end-release seat belt buckles.

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

- This report relates only to a component supplied by Indiana Mills and Manufacturing Inc. (IMMI). Contact information is:

Lisa Hanson

Director of Corporate Quality
 Indiana Mills and Manufacturing Inc.
 18881 US 31 North
 Westfield, IN 46074
 (317) 867-8451

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

Type	Make	Model	Number of Suspect Vehicles		
			United States	Canada	Export
Commercial Bus	IC Bus	CE	21	3	0
Commercial Bus	IC Bus	RE	18	0	0

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

- It is estimated that 44% of the vehicles in suspect population could have the suspect lot code. Of the suspect lots, IMMI estimates approximately 1% contain the defect.

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

- Certain IMMI seat belt assemblies equipped with L9 buckles may not satisfy the requirements of S4.3 (g) of Federal Motor Vehicle Safety Standard 209. When the push button on the buckle is pressed to release the latch plate for egress, the latch plate can become partially engaged with the buckle. Under this circumstance, the partially engaged latch plate may not separate from the buckle when a force of 22N or less is applied.

(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)]

- 11/11/2013 – Navistar was notified of a possible IMMI L9 buckle noncompliance from its IC bus subsidiary referencing IMMI’s 573 report to NHTSA that a noncompliance to FMVSS 209 exists in certain seat belt assemblies as noted in defect report.
- 11/14/13 – IC Bus manufacturing contained the suspect belt assemblies from being installed on IC bus product at the Tulsa assembly plant.
- 11/18/2013 – Navistar initiates inspections at bus plant and parts distribution centers to determine the scope of the issue.
- 12/09/2013 – Navistar Product Compliance finalizes the suspect bus population.
- 12/11/2013 – Navistar declares a safety recall.

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

- The remedy will involve inspection of the driver seat belt buckle in the suspect population and replacement of any buckle found with the suspect lot codes.

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

- A plan for reimbursement of pre-notification remedies is not needed as all the vehicles are within their original warranty period.

(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 02/18/2014.

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

- 13521

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