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PACCAR Inc

July 14, 2014

Via e-mail to rmd.odi@dot.gov
Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation (NEF-111)
Safety Assurance
National Highway Traffic Safety Administration
1200 New Jersey Ave SE
Washington, D.C. 20590

Re: **Noncompliant Warning Device**
PACCAR Recall No. PPD1407

Dear Ms. Timian:

Pursuant to 49 C.F.R. Part 573, PACCAR Inc hereby provides notice to NHTSA of its decision to voluntarily recall the aftermarket equipment identified below. PACCAR Parts, a division of PACCAR Inc, has determined that the affected equipment was sold to certain Kenworth and Peterbilt dealers in the United States.

Importer/Manufacturer - 573.6(c)(1)

PACCAR Parts
750 Houser Way North
Renton, WA 98057

Identification of Potentially Noncompliant Equipment - 573.6(c)(2)(ii)

Mirrex and TRP branded warning triangle kits ("Kits") sold in the aftermarket by PACCAR Parts with the following part numbers GMX1005K and MD1005K. Each Kit consists of three warning triangles in a protective plastic storage container. The Kits are manufactured by Torch Industrial Co., Ltd., and imported by PACCAR Parts.

Total Number of Potentially Noncompliant Items of Equipment - 573.6(c)(3)

134,583 kits were sold by PACCAR Parts to U.S. dealerships for resale to customers in the aftermarket between June 1, 2009, and July 2, 2014.

Percentage of Parts Estimated to Be Noncompliant - 573.6(c)(4)

The specific percentage of parts estimated to be noncompliant is unknown, but it is assumed that most of the parts identified above are noncompliant with Federal Motor Vehicle Safety Standard ("FMVSS") number 125, "Warning Devices."

Description of the Noncompliance - 573.6(c)(5)

The Kits do not comply with FMVSS 125 S.5.1.4(a), which requires that warning devices be permanently and legibly marked with the manufacturer's name. Although a label with the brand name is affixed to the protective storage container

supplied with the warning triangles, the manufacturer's name is not marked on each triangle.

Consequence: Without markings to identify the name of the manufacturer, owners may not be able to identify affected warning triangles in the event of a recall. Defective or noncompliant warning triangles that are not remedied pose an increased risk of performance failure, and thereby increase the risk of a crash or other safety hazard to motorists.

Chronology of Principal Events that Formed Basis for Recall – 573.6(c)(6)

In June or July of 2013, representatives from Deflecto, LLC, a competing manufacturer of warning triangles, traveled to Renton, Washington, to meet with the marketing department of PACCAR Parts. At the meeting, a Deflecto representative commented that PACCAR Parts was distributing warning triangles that did not comply with applicable FMVSS requirements.

PACCAR Parts requested documentation to support Deflecto's contention.

After the meeting in Renton, Deflecto emailed to PACCAR Parts a document, identified as Test Report No. 120320-04C, prepared by Calcoast Industrial Testing Laboratory. PACCAR Parts noted that the test had been performed on a Torch Mirrex GMX1005K Warning Triangle, a product that PACCAR Parts had stopped using two years earlier. PACCAR Parts informed Deflecto that it no longer sold the Mirrex warning triangles.

At the same time, PACCAR Parts contacted its supplier, Torch Industrial Co., Ltd., for verification that the products imported in 2013 complied with FMVSS 125. Torch assured PACCAR Parts that the triangles complied with FMVSS 125. Torch provided PACCAR Parts a copy of a certificate of compliance by AMECA, which validated a test report produced by a third-party laboratory dated May 6, 2011.

On July 1, 2014, PACCAR received a letter from NHTSA dated June 26, 2014, requesting information about Torch warning triangles imported on or after January 1, 2010. Enclosed with NHTSA's letter was Calcoast Test Report No. 120320-05C, which contained the results of tests performed on a Torch "Choice" warning triangle manufactured in July 2011. The report was different from the report that Deflecto sent to PACCAR Parts in 2013.

On July 8, 2014, while in the process of gathering information to respond to NHTSA's inquiry, PACCAR Parts realized that its Kits fail to comply with the marking requirement of FMVSS 125 S5.1.4(a) because the warning triangles are not marked with the name of the manufacturer.

Description of Remedy - 573.6(c)(8)

PACCAR Parts will notify customers who purchased noncompliant parts and inform them that they may return their Kits in exchange for a refund.

Communications Sent to Dealers and Owners – 573.6(c)(10)

Subject to NHTSA approval, a customer letter will be sent within 60 days.

Identification of Manufacturer's Campaign Number - 573.6(c)(11)

The PACCAR Parts number for this campaign is "PPD1407."

Please let me know if you have any questions or concerns.

Very truly yours,

s/Pamela S. Tonglao

Counsel
PACCAR Inc