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(8 pages)

PART 573 Defect and Noncompliance Information Report

On or about July 14, 2014, Kovatch Mobile Equipment Corp. ("KME") decided that a potential noncompliance with Federal Motor Vehicle Safety Standard No. 209 may exist in the motor vehicles listed below, and is furnishing this notification to the National Highway Traffic Safety Administration ("NHTSA") in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

KME's investigation of the matter is continuing, and this report will be supplemented as necessary.

Date this report was prepared: July 22, 2014

Manufacturer's identification code for this recall (if applicable): 2014-SR01

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Kovatch Mobile Equipment Corp.

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Steven M. Cormier, General Counsel

Telephone Number: (570) 669-5185 Fax No.: (570) 669-9966

Name and Title of Person who prepared this report.

Steven M. Cormier, General Counsel

Signed: _____



I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): KME Model Years Involved: 2013-14 Model(s): Panther; Predator;

Production Dates: Beginning: 10/2013 Ending: 03/2014

VIN Range: Beginning: 1K9AF4289EN058669* Ending: 1K9AF6489EN058759*

*NOTE: KME motor vehicles that may have been equipped with noncompliant seat belt buckles have been specifically identified as only those with the following VIN's: 1K9AF4289EN; 1K9AF4289EN; 1K9AF4280EN; 1K9AF4282EN; 1K9AF6486EN; 1K9AF6483EN; 1K9AF6487EN; 1K9AF4284EN; 1K9AF4286EN; and 1K9AF6489EN

Vehicle Type: Fire fighting apparatus Bodystyle: Pumper; Aerial; Tanker

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Recalled vehicles are equipped with Indiana Mills and Manufacturing, Inc. ("IMMI") seat belt assemblies incorporating model L9 end-release seat belt buckles that are potentially noncompliant with Federal Motor Vehicle Safety Standard 209 [49 CFR 571.209], S4.3(g), and that were produced at IMMI facilities in Westfield, IN, between August 2, 2013 and October 31, 2013, or in Saltillo, Mexico, between August 8, 2013 and October 31, 2013.

Make(s): Model Years Involved: Model(s):
Production Dates: Beginning: _____ Ending: _____
VIN Range: Beginning: _____ Ending: _____
Vehicle Type: Bodystyle:

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): Model Years Involved: Model(s):
Production Dates: Beginning: _____ Ending: _____
VIN Range: Beginning: _____ Ending: _____
Vehicle Type: Bodystyle:

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles manufactured during that time period. 7%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles</u>
Panther	2014	1
Predator	2013-14	9

Total Number Potentially Affected by the Recall: 10

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 60%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

KME has received information from IMMI indicating that certain seat belt assemblies that include the potentially noncompliant L9 seat belt buckles were sold to KME during the relevant time period indicated by IMMI, for use by KME in mobile fire apparatus that KME was manufacturing. The recall population was determined by examining documentation related to KME's purchase of seat belt assemblies or components that IMMI identified as being potentially noncompliant, which documentation associated the suspect units directly with particular motor vehicles manufactured by KME.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

According to IMMI, certain seat belt assemblies equipped with L9 buckles do not satisfy the requirements of 49 CFR 571.209, S4.3(g) of FMVSS 209. When the push button on the buckle is pressed to release the latch plate in order to egress the vehicle, the latch plate can become partially engaged with the buckle, rather than being fully released. Under that circumstance, the partially engaged buckle may not fully separate when a force of 22N is applied.

Describe the cause(s) of the defect or noncompliance condition.

The noncompliance is the result of the locking pawl inside the L9 buckle having a large burr that can catch the edge of the latch plate when the button is pressed to unbuckle the seat belt, resulting in a partial engagement condition.

Describe the consequence(s) of the defect or noncompliance condition.

As a result of the noncompliance, it is possible that a motor vehicle occupant could be delayed in exiting the vehicle in circumstances where such a delay could pose a safety risk.

Identify any warning which can (a) precede or (b) occur.

None

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Indiana Mills and Manufacturing, Inc., 18881 US 31 North, Westfield, IN 46074

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Lisa Hanson, Director of Corporate Quality

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

KME's determination of noncompliance is based solely on information reported by IMMI. KME has conducted no testing or other evaluation, but is relying on communications from IMMI and NHTSA in its determination that the noncompliance may exist in some of its vehicles, as set forth above. In November 2013, KME was informed by IMMI that some of the seat belt assemblies purchased by KME from IMMI may not be compliant with applicable standards, and should be replaced. KME received replacement components from IMMI in March 2014. In June 2014, KME determined that several of its trucks may be subject to the recall campaign, and commenced an investigation. In July 2014, KME received information that indicates that at least six (6) motor vehicles manufactured by KME may include noncompliant seat belt components, and has initiated this recall accordingly.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

KME will make arrangements to have nonconforming seat belt buckles replaced at the dealer or owner's location or at the nearest KME authorized service facility at no cost to the owner, and will arrange for prompt reimbursement of all reasonable costs that may have been incurred by an owner or dealer in connection with same, including documented costs incurred for any pre-notification remedy that occurred on or after November 1, 2013.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

The remedy for the stated nonconformity will entail KME notifying owners of the subject vehicles of the existence of the potential nonconformity, and, if the nonconformity is determined to exist on the owner's vehicle, making arrangements to have the nonconforming seat belt buckles replaced at the dealer or owner's location or at the nearest KME authorized service facility at no cost to the owner. The remedy will result in the owner having seat belts with buckles in which the internal locking pawl will not have a burr large enough to catch on the edge of the latch plate when the operator attempts to unbuckle the seat belt, possibly resulting in a partial engagement condition.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The remedy seat belt buckle will include an internal locking pawl that will not have a burr large enough to catch on the edge of the latch plate when the operator attempts to unbuckle it, which could result in a partial engagement condition. The recalled seat belt buckle includes an internal locking pawl that may have a burr on it that is large enough to catch on the edge of the latch plate, thereby resulting in a condition of partial engagement after the operator has attempted to release it.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The recall condition was corrected in production in November 2013 by means of the component manufacturer, IMMI, correcting the issue in its own production, thereby ensuring that KME was thereafter only supplied with seat belt assemblies that did not contain the nonconformity. However, it was determined that specific units containing the recall condition, which were able to be identified by production information supplied by IMMI, did make it into production at KME prior to KME receiving a recall notice and replacement components. Because of this, KME has initiated this recall. Because of IMMI's own corrective action, it was not necessary for KME to take further corrective action in regard to its own production.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

KME will immediately begin to notify affected owners [within five (5) days after NHTSA's approval of KME's proposed communication] of the recall.

Expected completion of recall notification: August 10, 2014

Expected completion of verification of recall condition: August 25, 2014

Expected completion of recall remedy in all affected units: October 31, 2014

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

A copy of the proposed initial recall notice is attached.