



BY ELECTRONIC MAIL (RMD.ODI@DOT.GOV)

July 29, 2014

Nancy L. Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Dear Ms. Lewis:

Cummins Inc. has determined that certain fuel filters, as identified below, may contain a safety-related defect. The following is submitted in accordance with the National Highway Traffic Safety Administration's defect regulations, 49 CFR Part 573.6.

**Product Identification and Estimated Defect Population:**

This notice involves approximately 63,600 Fleetguard UFF-XT fuel filters, part number FF63009, manufactured between April 25, 2014 and June 29, 2014 and having a date code between 14115 and 14180. Approximately 42,000 of the subject fuel filters were distributed as replacement equipment through the aftermarket channel, and approximately 21,600 filters were installed on the Cummins engines identified in the table below.

Engine Plant	Engine Model	Build Date Range
CMEP	ISB	April 28, 2014 – July 9, 2014
RMEP	ISB & ISL	April 30, 2014 – July 8, 2014

Up to approximately 25% of the fuel filters are estimated to contain this defect.

It is anticipated that these population numbers will be revised lower as Cummins continues to quantify containment actions and to clarify the aftermarket channel, OEM customers and final customer location. Cummins expects to be able to provide a list of the impacted OEM's by August 8, 2014.

**Description of the Defect**

The bond that attaches the filter shell to the filter nut plate may fail. If this occurs, the shell may separate from the fuel filter nut plate, causing the engine to stall without prior warning and without the ability to restart the engine until the fuel filter is replaced.

**Description of the Safety Risk**

An unexpected engine stall with the inability to restart the engine may lead to an increased risk of a crash.

**Chronology of Events**

July 7, 2014: An engine at a Cummins engine plant experienced a fuel filter failure during an engine test. Cummins also received a report of a fuel filter failure at an OEM vehicle assembly plant.

July 7-22, 2014: Cummins conducted a failure investigation, including product testing, and was able to duplicate the failure in test conditions. A Product Safety Hazard Analysis was also completed. During this period, Cummins received reports of three additional failures at an OEM vehicle assembly plant and two failures in the field.

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July 22, 2014: Based upon the results of the failure investigation and testing, Cummins decided to initiate this voluntary campaign to remedy the condition.

To date, no reports of injuries, fatalities, accidents, or fires related to this condition have been received.

### **Remedy Program**

Cummins will notify its OEM and distributor customers of this recall and will work with these customers to identify and notify affected vehicle owners and aftermarket purchasers. Product remaining in customer inventory will be replaced with new (non-defective) product, and installed product will be replaced, without charge, through the Cummins service network. Cummins' campaign code for the fuel filter recall will be C1545.

### **Part 577 Notice Letter; Dealer Bulletins**

A draft owner notification letter will be submitted to the agency for review and approval as soon as possible. Representative copies of distributor bulletins related to this recall will be provided within five business days after they are issued.

### **Customer/Owner Notifications**

Notification of affected OEM and distributor customers is expected to occur by August 8, 2014. The timing of notification to vehicle owners and to downstream aftermarket purchasers will be determined in consultation with the affected OEMs and distributors. Owner notification will commence promptly after Cummins' receipt of the customer contact information.

### **Pre-Notification Remedy Reimbursement**

Pursuant to 49 CFR §577.11(e), Cummins requests that it be exempt from providing notification of a reimbursement plan. Any pre-notification product failure would have been replaced under the manufacturer's limited warranty. Accordingly, no person would be eligible for reimbursement pursuant to §573.13.

Please advise the undersigned of the recall campaign number assigned by the Office of Defects Investigation to this recall.

Sincerely,



Mark L. Wilson  
Director – Product Safety  
Cummins Inc.

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cc: Mr. Christopher H. Grigorian, Foley & Lardner LLP  
Mr. Matthew Winings, Cummins Inc.  
Ms. Kelly Schuler, NHTSA