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May 4, 2015

Ms. Kelly Schuler
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Reply to request for information on filing date

Dear Ms. Schuler,

In your acknowledgement letter to Gillig you stated the following:

The information in your report suggests that Gillig may have been aware of this issue more than five business days before filing a report with NHTSA. Please explain the delay between changing the brake hose length in production five days after learning of the issue and filing the defect report with us two months later.

In response I submit the following:

On 2/5/15 a Gillig Field Service technician noted contact between a brake hose and suspension tower on an in service customer bus. Gillig Engineering reviewed production buses for this issue and noted some brake hoses could touch the suspension tower under certain conditions. Gillig initiated a change to a shorter hose in production to eliminate the potential for the hose to touch the suspension tower. Gillig did not make a determination at this time that the hose touching the suspension tower was a safety defect. Gillig Field Service Technicians then looked at other buses in the field for this condition. The hoses on these buses were inspected for signs of wear in the location where contact was possible. None of the hoses inspected showed any signs of wear. A review of warranty history indicated no customer complaints and no warranty claims related to this hose and its location with respect to the suspension tower. No accidents, injuries or deaths had been reported relative to this issue. Engineering reviewed many hose installation orientations possible with the long hose and determined that typical manufacturing installation variation would not result in much more than single point contact between the hose and the tower. Buses reviewed in the field confirmed this.

Despite no warranty claims, accidents, injuries, death and no signs of wear on any hoses on in service buses that were inspected, there still remained uncertainty regarding potential accumulated wear over the 12 year service life of these vehicles. Gillig decided 4/10/15 to initiate a voluntary recall.

In summary, upon hearing of the issue and prior to a complete evaluation of the defect as a potential risk to motor vehicle safety, Gillig took immediate action to minimize any potential future risk by changing hose lengths on production vehicles. Following that action, the risk to motor vehicle safety was fully evaluated and using an overabundance of caution Gillig initiated a voluntary recall.

I hope this satisfactorily answers your question. Please let me know if anything more needs to be done in this regard.

Sincerely,



Gregory J Vismara
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