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13V-308
(4 pages)

R. L. Van Laar
Compliance Manager

August 6, 2013

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

Subject: Noncompliance Information Report (Revision 1)
Navistar Campaign 13512

Dear Associate Administrator:

This noncompliance information report is submitted pursuant to Part 573.6(a), and is an update to the incomplete report that was filed on 7/10/13.

(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:
 - School Bus / IC Bus / AE / 2013 and 2014
 - School Bus / IC Bus / BE / 2011, 2012, 2013, and 2014
 - School Bus / IC Bus / CE / 2011, 2012, 2013, and 2014
 - School Bus / IC Bus / RE / 2011, 2012, 2013, and 2014
- Vehicle Manufacturing Dates:
 - 02/11/2010 through 06/17/2013
- Other Identification Necessary to Describe Vehicles:
 - None

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

- The passenger seats are assembled by IC Bus
- This report relates to the foam padding supplied by Foam Rubber LLC as part of the seat assembly. Contact information is:

Martin Gonzalez
COO

Foam Rubber LLC
 2000 Troy Ave.
 New Castle, IN 47362
 (765) 521-2000

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

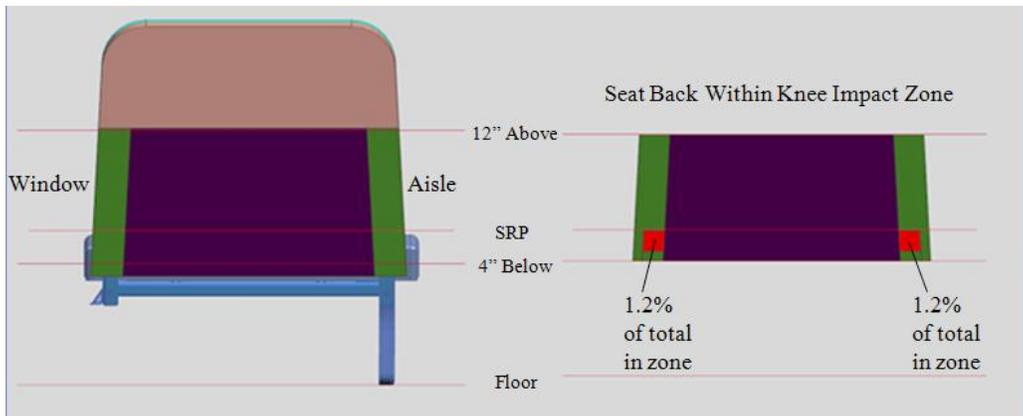
Type	Make	Model	Number of Suspect Vehicles		
			United States	Canada	Export
School Bus	IC	AE	16	0	0
School Bus	IC	BE	402	43	0
School Bus	IC	CE	20917	2480	0
School Bus	IC	RE	929	25	0

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

- It is estimated that all (100%) of the vehicles in suspect population could have the defect.

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

- Certain school bus passenger seats do not meet the full requirements of FMVSS 222 as prescribed in paragraph S5.3.2.2 which states when any point on the rear surface of that part of a seat back or restraining barrier within any zone specified in S5.3.2.1 is impacted from any direction at 4.9 m/s (11MPH) by the knee form specified in S6.7, the resisting force of the impacted material shall not exceed 2,669 N (600 lbs.) and the contact area on the knee form surface shall not be less than 1,935 mm² (3 in²).
- The resisting force of the impacted material did exceed 2,669 N (600 lbs.) in two small areas on the outside lower corner of the knee impact zone). Navistar and third party test results of exemplar seats are shown in the exhibit and table below:



Window Impact Loads (lbs)			Aisle Impact Loads (lbs)		
Navistar	3rd party	MGA	Navistar	3rd party	MGA
644	655	767	543	322	587
652	658	819	567	370	657
771	707	970	573	400	827
813	828	1174	575	450	836

855		1244		576	465	933
876		1326		623	487	968
948				655	505	
957				662	508	
986				680	526	
994				729	532	
1069				788		

(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)]

- 05/23/2013 – IC Bus receives notice of failed compliance testing of the knee impact requirement FMVSS 222 Knee Impact Force testing performed by MGA on behalf of NHTSA.
- 05/28/2013 – IC Bus visits MGA test lab to review test results and compliance testing reports and verify test methods.
- 06/14/2013 – IC Bus initially performs FMVSS 222 knee impact force testing in effort to duplicate the MGA test. The resisting force of the impacted material when tested measured 4759.5 N (1070 LBS) and begins investigation into root cause. It was determined that the foam in the lower corner was not built to print dimensions on the suspect seats.
- 06/18/2013 – Navistar contained the issue by having the supplier change their manufacturing process to build the seat foam to print dimensions.
- 06/24/2013 – Completed testing of several seats at a third party test labs. Of the seats tested, some were below the maximum force requirement and some exceeded the maximum requirement in the lower corners of the knee impact zone, reference chart above.
- 07/02/2013 – Navistar meets to review test results and determines that non-compliance to FMVSS 222, paragraph S5.3.2 exists in certain passenger seats.
- 7/10/2013 – Navistar submits initial notice of non-compliance to NHTSA.
- 07/15/2013 – IC Bus and Navistar Engineering meet to determine suspect date range and bus population.
- 08/01/2013 – Navistar declares a non-compliance recall.

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

- The remedy will involve installation of polystyrene blocks in the lower outside corners of each seat.

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

- Navistar’s plan for reimbursement of pre-notification remedies, on file and dated 1/5/09, applies and instructions will be included in the customer notification.

(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 10/2/13.

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

- 13512

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