



U.S. Department of Transportation  
**National Highway Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

May 16, 2019

Mr. Scott Goeb  
Product Safety Manager  
Pierce Manufacturing  
2600 American Dr  
Appleton, WI 54912

NEF-150MR  
19V-280

**Subject:** Brake Light May Randomly Illuminate/FMVSS 108

Dear Mr. Goeb:

This letter serves to acknowledge Pierce Manufacturing's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**

FRONTLINE/C-25/2018-2019  
FRONTLINE/C-35X/2018-2019  
FRONTLINE/C-45X-3/2018-2019  
FRONTLINE/ENCORE RESCUE/2018-2019

**Mfr's Report Date:** April 10, 2019

**NHTSA Campaign Number:** 19V-280

**Components:**

EXTERIOR LIGHTING:BRAKE LIGHTS

**Potential Number of Units Affected:** 4

**Problem Description:**

Pierce Manufacturing (Pierce) is 2018-2019 Frontline C-35X, C-25, C-45X-3 and Encore Rescue vehicles equipped with Whelen brake lights. Depending on the specific wiring of the vehicle, these brake lights may illuminate when the brake pedal has not been pressed. As such, these vehicles fail to comply with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) number 108, "Lamps, Reflective Devices, and Associated Equipment."

**Consequence:**

If the brake lights incorrectly illuminate, it can confuse other drivers, possibly increasing the risk of a crash.

**Remedy:**

Pierce has notified owners, and dealers will inspect and replace brake lights, if necessary, free of charge. The recall began April 23, 2019. Owners may contact Whelen customer service at 1-860-718-2331 or Pierce at 1-888-974-3723. Pierce's number for this recall is FLCWBL0419.

**Notes:**

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to [www.safercar.gov](http://www.safercar.gov).

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

Your filing lists a possible 8 different year/Make/Models affected, but the vehicle population given is 4. Please correct the wrong information.

Please be reminded of the following requirements:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall are required to be submitted to this office no later than 5 days after they are originally sent.

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Michelle Rice who may be reached by phone at (202) 366-1060, or by email at michelle.rice@dot.gov. We look forward to working with you.

Sincerely,



Kareem Habib  
Acting Chief, Recall Management Division  
Office of Defects Investigations  
Enforcement