OMB Control No.: 2127-0004

Part 573 Safety Recall Report

20E-054

Manufacturer Name: Kiel N.A., L.L.C
Submission Date: AUG 10, 2020
NHTSA Recall No.: 20E-054
Manufacturer Recall No.: NR



Manufacturer Information:

Manufacturer Name: Kiel N.A., L.L.C

Address: 2009 Middlebury Street

Elkhart IN 46516

Company phone: 574-293-3600

Population:

Number of potentially involved: 437 Estimated percentage with defect: NR

Equipment Information:

Brand / Trade 1: Kiel

Model: Avance

Part No.: 2025, 2050,1030

Size: NR

Function: Coach Seating

Descriptive Information: ELR/ALR functionality issue on safety belts on rear cross (last row) passenger

seats. Mounting location of belt retractor on rear cross chassis is reducing length of webbing required for switching back from ALR (Automatic Locking Retractor – used for securing a child seat) to ELR (Emergency Locking Retractor – allows the seat belt to freely extend and retract with occupant movement, yet locks the belt during a sudden stop or upon impact) mode on Schnierle belt after activation. ALR is activated by pulling the belt all the way out. ALR is deactivated by

unbuckling the belt and allowing it to retract fully. Amount of webbing necessary

for deactivation is very close to the switching tolerance of belt. Recall population is based on manufacturing traceability data.

Production Dates: JAN 09, 2019 - JUL 02, 2020

Description of Noncompliance:

Description of the ELR/ALR functionality issue on safety belts on rear cross (last row) passenger

Noncompliance: seats. Mounting point of belt retractor on rear cross chassis is reducing length

of webbing required for switching back from ALR to ELR mode on Schnierle belt after activation. Amount of webbing necessary for deactivation is very

close to the switching tolerance of belt.

FMVSS 1: 210 - Seat belt assembly anchorages

FMVSS 2: NR

Description of the Safety Risk: Locked belt system

Description of the Cause: Mounting location of belt retractor on rear cross chassis is reducing length of

webbing required for switching back from ALR to ELR mode on Schnierle belt

after activation.

Identification of Any Warning Belt will not pull out or retract when attempting to switch back from ALR to

that can Occur: ELR mode after activation.

Involved Components:

Component Name: Baseframe

Component Description: Seat chassis

Component Part Number: 177302, 177303, 158777, 158778

Supplier Identification:

Component Manufacturer

Name: FKT

Address: NOSAB 305.Sokak No:1 16145 Nilüfer

Bursa FOREIGN STATES

Country: Turkey

Chronology:

07/15/2020 Kiel NA was notified by Motor Coach Industries that a seat belt on a rear cross seat was not functioning properly.

07/28/2020 Seat was inspected at Kiel NA.

07/28/20-07/31/20 Root cause analysis identified design issue. Mounting location of belt retractor on rear cross chassis is reducing length of webbing required for switching back from ALR to ELR mode on Schnierle belt after activation.

07/31/2020 - Current – Development of retrofit and long-term solution for relocating mounting location of belt retractor.

Description of Remedy:

Description of Remedy Program: All rear cross seats containing chassis 177302, 177303, 158777, 158778

will have a modification installed. This modification will relocate the belt retractor on rear cross chassis allowing the additional webbing needed for switching back to ELR mode. Modification of rear cross chassis will be

done at Kiel expense.

How Remedy Component Differs Remedied rear cross chassis will have an extension installed.

from Recalled Component :

Identify How/When Recall Condition Modified rear cross chassis mounting location for belt retractor will be

was Corrected in Production: implemented prior to any further production.

Recall Schedule:

Description of Recall Schedule: TBD

Planned Dealer Notification Date: NR - NR Planned Owner Notification Date: NR - NR

Purchaser Information:

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name: NR

Address: NR

NR

Country: NR

Company Phone: NR

^{*} NR - Not Reported