

Motor Coach Industries
1475 Clarence Avenue
Winnipeg, Manitoba R3T 1T5
Canada
Attn: John-Paul Pelletier

Michaela Oberbauer, GM
Sharon Bachtel, QA Mgr

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August 10, 2020

RE: Recall of Non-Compliant Kiel Rear Cross Seats
NHTSA ID: 20E054

Dear Mr. Pelletier,

Following is information about the Rear Cross ELR/ALR issue. At this time, there is no action necessary on the part of MCI. This recall is expected to be closed within the next two months. Updates will be sent as information becomes available.

Description of issue:

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.

History:

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.

NHTSA Reporting:

A NHTSA Equipment Report has been filed on this topic effective 08/10/2020. Please see attachment #1.

Root 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. Amount of webbing necessary for deactivation is very close to the switching tolerance of belt.

Immediate Corrective Action:

All rear cross seats containing impacted chassis 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. Plan to repair these coaches is as follows:

Valley Metro -Solution will be sent to Red River Freight who will repair on site at MCI. Timing is anticipated to be week of 08/17/2020.

Facebook -Coaches in service and at Hayward Facility - Kiel NA Representative(s) will travel to these locations to perform the repair as soon as Covid travel restrictions allow.

-Coaches not yet in service – Repair will be performed at Kiel NA during 2nd inspection.

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UMA Demo Coach – Please provide current location of coach.

Impact:

Following coaches are impacted:

Unit #	Sets	Project	PO#
	Demo	FACEBOOK	
81004	1/77	FACEBOOK	P392317
81005	2/77	FACEBOOK	P392317
81006	3/77	FACEBOOK	P392317
81007	4/77	FACEBOOK	P392317
81008	5/77	FACEBOOK	P392326/1
81009	6/77	FACEBOOK	P392326/2
81010	7/77	FACEBOOK	P392326/3
81011	8/77	FACEBOOK	P392326/4
81012	9/77	FACEBOOK	P700916/1
81013	10/77	FACEBOOK	P700916/2
81014	11/77	FACEBOOK	P700916/3
81017	12/77	FACEBOOK	P700916/4
81018	13/77	FACEBOOK	P700917/1
81019	14/77	FACEBOOK	P700917/2
81020	15/77	FACEBOOK	P700917/3
81021	16/77	FACEBOOK	P700917/4
81022	17/77	FACEBOOK	P700918/1
81023	18/77	FACEBOOK	P700918/2
81024	19/77	FACEBOOK	P700918/3
81025	20/77	FACEBOOK	P700918/4
81026	21/77	FACEBOOK	P700919/1
81027	22/77	FACEBOOK	P700919/2
81028	23/77	FACEBOOK	P700919/3
81029	24/77	FACEBOOK	P700919/4
81030	25/77	FACEBOOK	P700920/1
81031	26/77	FACEBOOK	P700920/2
81032	27/77	FACEBOOK	P700920/3
81033	28/77	FACEBOOK	P700920/4
81034	29/77	FACEBOOK	P700920/5
81035	30/77	FACEBOOK	P700921/1
81036	31/77	FACEBOOK	P700921/2
81037	32/77	FACEBOOK	P700921/3
81039	33/77	FACEBOOK	P700921/4
81040	34/77	FACEBOOK	P700921/5
81041	35/77	FACEBOOK	P393319/1
81042	36/77	FACEBOOK	P393319/2
81043	37/77	FACEBOOK	P393319/3
81044	38/77	FACEBOOK	P393319/4
81045	39/77	FACEBOOK	P393319/5
81046	40/77	FACEBOOK	P393320/1
81047	41/77	FACEBOOK	P393320/2
81048	42/77	FACEBOOK	P393320/3
81049	43/77	FACEBOOK	P393320/4

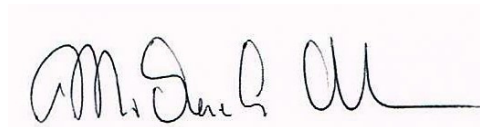
81050	44/77	FACEBOOK	P393320/5
81051	45/77	FACEBOOK	P393321/1
81052	46/77	FACEBOOK	P393321/2
81053	47/77	FACEBOOK	P393321/3
81054	48/77	FACEBOOK	P393321/4
81055	49/77	FACEBOOK	P393321/5
81056	50/77	FACEBOOK	P393322/1
81057	51/77	FACEBOOK	P393322/2
81058	52/77	FACEBOOK	P393322/3
81059	53/77	FACEBOOK	P393322/4
81060	54/77	FACEBOOK	P393322/5
81061	55/77	FACEBOOK	P393323/1
81062	56/77	FACEBOOK	P393323/2
81063	57/77	FACEBOOK	P393323/3
81064	58/77	FACEBOOK	P393323/4
81065	59/77	FACEBOOK	P393323/5
81066	60/77	FACEBOOK	P393324/1
81067	61/77	FACEBOOK	P393324/2
81068	62/77	FACEBOOK	P393324/3
61069	63/77	FACEBOOK	P393324/4
81070	64/77	FACEBOOK	P393324/5
81071	65/77	FACEBOOK	P393325/1
81072	66/77	FACEBOOK	P393325/2
81073	67/77	FACEBOOK	P393325/3
81074	68/77	FACEBOOK	P393325/4
81075	69/77	FACEBOOK	P393325/5
81076	70/77	FACEBOOK	P393326/1
81077	71/77	FACEBOOK	P393326/2
81078	72/77	FACEBOOK	P393326/3
81079	73/77	FACEBOOK	P393326/4
81080	74/77	FACEBOOK	P393326/5
81081	75/77	FACEBOOK	P393327/1
81082	76/77	FACEBOOK	P393327/2
81083	77/77	FACEBOOK	P393327/3
69727	1/1	UMA DEMO J20-01	F028883
81086	1/4	VALLEY METRO	P394218
81087	2/4	VALLEY METRO	P394218
81088	3/4	VALLEY METRO	P394218
81089	4/4	VALLEY METRO	P394218

Long Term Corrective Action:

Modified rear cross chassis mounting location for belt retractor will be implemented prior to any further production.

Please contact us if you have any questions or need further information.

With best regards,
Kiel N.A., L.L.C.



Michaela Oberbauer
General Manager



Sharon Bachtel
QA Manager

Attachment 1: NHTSA Equipment Report