OMB Control No.: 2127-0004

Part 573 Safety Recall Report

21V-222

Manufacturer Name: Pierce Manufacturing

NHTSA Recall No.: MAR 30, 2021
Nanufacturer Recall No.: NR



Manufacturer Information:

Manufacturer Name: Pierce Manufacturing

Address: 2600 American Drive

P.O. BOX 2017 Appleton WI

54912-2017

Company phone: 920-832-3000

Population:

Number of potentially involved : 4 Estimated percentage with defect : 100 %

Vehicle Information:

Vehicle 1: 2016-2018 Pierce Enforcer, Freightliner and Saber

Vehicle Type: BUSES, MEDIUM & HEAVY VEHICLES

Body Style : ALL Power Train : DIESEL

Descriptive Information: Pierce vehicles built with ECCO Holdings Corp. Code 3 7x9 Stop-Tail-Turn-Reverse

All-in-One LED Lamp (p/n 79STTRBZ).

Production Dates: AUG 31, 2016 - MAY 26, 2018

VIN Range 1 : Begin : NR End : NR Not sequential

Description of Noncompliance:

Description of the Noncompliance: The subject lamps exceed the maximum permissible candela levels specified in Noncompliance: Federal Motor Vehicle Safety Standard (FMVSS) No. 108 at certain test points.

FMVSS 1: 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2: NR

Description of the Safety Risk: The increased photometric intensity does not comply with the requirements

of FMVSS 108 and may adversely affect the vision of following drivers.

Description of the Cause: The lamps do not meet the requirements of the relevant standard.

Identification of Any Warning NR

that can Occur:

Involved Components:

Component Name 1: NR
Component Description: NR
Component Part Number: NR

Supplier Identification:

Component Manufacturer

Country: United States

Name: ECCO Holdings Corp.
Address: 833 West Diamond
Boise Idaho 83705

Chronology:

ECCO Holdings Corp. Chronology:

March 30 and 31, 2020 – Photometry testing was conducted in connection with a change in suppliers for the PCB assembly used in the subject lamps. This testing showed elevated intensity levels in one of the tested lamps.

May – June, 2020 – The company conducted an investigation into the production and design history of the lamp, obtained additional samples for testing, and, on June 14 and 15, 2020, conducted additional photometry tests on sample lamps.

June 15, 2020 – Based upon the testing and other information developed during the investigation, company management decided that a noncompliance with FMVSS 108 exists within the subject population. There have been no known complaints, accidents or injuries related to this noncompliance.

Pierce Mfg. Chronology:

March, 2021 - Pierce Mfg. recall notice submitted

Description of Remedy:

Description of Remedy Program: Customers will be sent the Code 3 filter kit (Part No. CZ0199) free of

charge. Installation of the filter kit will ensure that the lamps perform

within the permissible photometric intensity ranges.

How Remedy Component Differs The remedy involves installation a filter kit that will ensure that the lamps

from Recalled Component: perform within the permissible photometric intensity ranges.

Identify How/When Recall Condition When Pierce was informed of this recall, Pierce had zero inventory of this was Corrected in Production: component as it is a non-standard option and is only procured per customer request.

Recall Schedule:

Description of Recall Schedule: NR

Planned Dealer Notification Date: APR 26, 2021 - APR 30, 2021 Planned Owner Notification Date: APR 26, 2021 - APR 30, 2021

^{*} NR - Not Reported