

# Part 573 Safety Recall Report

# 21V-731

**Manufacturer Name :** Workhorse Group Inc.

**Submission Date :** JAN 12, 2022

**NHTSA Recall No. :** 21V-731

**Manufacturer Recall No. :** 21V731



## Manufacturer Information :

Manufacturer Name : Workhorse Group Inc.

Address : 100 Commerce Drive  
Loveland OH 45140

Company phone : (513) 360-4704

## Population :

Number of potentially involved : 41

Estimated percentage with defect : 100 %

## Vehicle Information :

Vehicle 1 : 2020-2021 Workhorse C1000M / C1000S / C650

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style :

Power Train : NR

Descriptive Information : All delivered vehicles are affected. The total number of vehicles delivered is 41.

C1000M - 34 of model year 2020/2021

C1000S - 6 of model year 2020/2021

C650 - 1 of model year 2020

Production Dates : DEC 01, 2019 - JUN 30, 2021

VIN Range 1 : Begin :

NR

End : NR

☐ Not sequential

## Description of Noncompliance :

Description of the Noncompliance : Workhorse has determined that certain vehicles were sold without documented confirmation that they are compliant with all applicable FMVSSs. In some cases, noncompliances have been confirmed. Workhorse is not aware of any crashes or injuries caused by these issues.

This safety recall concerns non-compliances with FMVSS 101, 104, 108, 120 and 206.

FMVSS 1 : 101 - Control and displays

FMVSS 2 : 104 - Windshield wiping and washing systems

Description of the Safety Risk : If a vehicle does not meet all applicable FMVSSs, there is an increased risk of crash and/or injury.

Description of the Cause : NR

Identification of Any Warning that can Occur : NR

### Involved Components :

Component Name 1 : Headlight Switch

Component Description : NR

Component Part Number : W0026979

Component Name 2 : Steering Column

Component Description : NR

Component Part Number : W002499

Component Name 3 : Wiper Switch

Component Description : NR

Component Part Number : W0026986

Component Name 4 : Wiper Blade (Driver Side)

Component Description : NR

Component Part Number : W0026958

Component Name 5 : Wheel Rim

Component Description : NR

Component Part Number : W0023946

### Supplier Identification :

#### Component Manufacturer

Name : NR

Address : NR

NR

Country : NR

### **Chronology :**

August 2021

After leadership changes at Workhorse, the company requested its staff to provide evidence of compliance with all applicable FMVSSs. Workhorse retained an engineering consulting firm, Engineering Answers, LLC, to conduct a visual compliance review of its C1000S (also known as C62) vehicle. The engineering firm identified non-compliance with certain FMVSSs in a report dated August 6, 2021. The report also noted the need to conduct physical testing to confirm compliance with certain standards.

Workhorse leadership learned that Engineering Answers, LLC had provided advice previously (in 2019 and 2020) about certain non-compliance.

Workhorse leadership also sought a visual compliance review by a different engineering consulting firm, Pilot Systems, Inc. Pilot confirmed substantially the same discrepancies identified by Engineering Answers, LLC in a report delivered to Workhorse on August 31, 2021.

September 17, 2021

Workhorse leadership decided to conduct a recall to address the potential and actual non-compliance. The recall decision was based on the engineering firms' confirmation of some non-compliance, as well as upon verification of incompleteness of documentation confirming that the subject vehicles complied with other applicable standards.

January 7, 2022

Based upon independent testing results, Workhorse leadership determined that FMVSS 206 would be added to the C-Series non-compliance list. (Note: No additional vehicles or actions beyond those already covered by the initial Dealer/Customer notices were affected by this decision.)

## Description of Remedy :

### Description of Remedy Program : FMVSS 101

Replace headlamp switch cover with one containing the FMVSS specified headlamp symbol to avoid operator confusion.

Replace Turn Signal / Dimmer Switch Lever Knob with one containing the FMVSS specified headlamp symbol to avoid operator confusion.

Replace hazard switch button with one containing the FMVSS specified hazard symbol to avoid operator confusion.

Install software update with alert/warning with FMVSS specified icon corrections to avoid operator confusion

Replace Wiper / Washer Switch with an illuminated switch to facilitate dusk-to-dawn operator safety.

### FMVSS 104

Increase the length of the driver side wiper blade to 28" to increase the swept area and improve the driver's field of view in inclement weather.

### FMVSS 108

Attach In-Cab Operator Warning Tag to alert operators that the vehicle is not to be operated on public roads open to unrestricted public travel before affixing the reflex reflectors shipped with the vehicle. (Note: The reflex reflectors are not installed during production to allow dealers/upfitters/customers the opportunity to first paint/wrap the exterior of the vehicle.)

### FMVSS 120

Replace wheel rims not marked in compliance with Federal regulations. While Workhorse is confident in the performance and safety of the rims installed on all vehicles to-date, the company is replacing all unmarked rims to avoid confusion, customer cost or inconvenience.

### FMVSS 206

Install reinforced driver and passenger side door latch supports on C1000M & C650 series vehicles.

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There is no reimbursement program as the vehicles included in 21V731 are all still under warranty, and no owner, purchaser, or dealer would have incurred costs for any 21V371 related repairs. If an owner, purchaser, or dealer incurred any costs related to 21V371 repairs outside of the warranty, Company will reimburse those costs following receipt of documentation (e.g. Paid Invoices, Receipts, etc.)

### How Remedy Component Differs from Recalled Component :

All remedy components have been issued a new part number.

**Identify How/When Recall Condition was Corrected in Production :** Effective September 23, 2021, all remedy components have been issued a new part number. All noncompliant parts were removed from production and sequestered to prevent reintroduction into either production or service part usage.

### Recall Schedule :

**Description of Recall Schedule :** Owners were notified by telephone on September 23-24, 2021, and formal notification will occur after NHTSA approval of the owner letter. To our knowledge, all vehicles have been grounded.

A revised notification letter including the addition of FMVSS 206 noncompliance was issued January 13, 2022.

**Planned Dealer Notification Date :** SEP 23, 2021 - JAN 13, 2022

**Planned Owner Notification Date :** SEP 23, 2021 - JAN 13, 2022

\* NR - Not Reported