



October 9, 2018

Administrator, Heidi King  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Re: Petition for Inconsequential Non Compliance, Low Air Brake Warning**

Dear Ms. King,

On behalf of Mack Trucks Inc., I respectfully submit this petition for your consideration. I appreciate yours and NHTSA's consideration in this matter.

I noticed that the regulation requires submission of the petition within 30 days of making determination. As this is the fifty-fifth day, the petition was not submitted according to the requirements. I am fully responsible for this as I believed that petitions for inconsequential non-compliance for manufacturer made determinations were at 60 days. My apologies for this oversight.

Please feel free to contact me if you have any further questions or need additional information to support the assessment.

With Best Regards,

Tim LaFon  
Vice President Regulatory Affairs  
Email: [timothy.lafon@volvo.com](mailto:timothy.lafon@volvo.com)  
Office: (336) 393-2233  
Mobile: (336) 457-2263

**Information Required per 49CFR556**

**Full Name of Applicants:**

Mack Trucks Inc.  
7825 National Service Rd.  
Greensboro, NC 27409

**Nature of Business:** Vehicle Manufacturer, Corporation, United States.

From our part 566 filing:

Mack Trucks manufacturers complete heavy duty motor vehicles sold for use as truck-tractors and incomplete heavy duty motor vehicles sold for use in truck model applications such as refuse, concrete mixer, dump truck etc.

The Gross Vehicle Weight Rating of these motor vehicles exceeds 26,001 lbs. (Class 7 & 8)

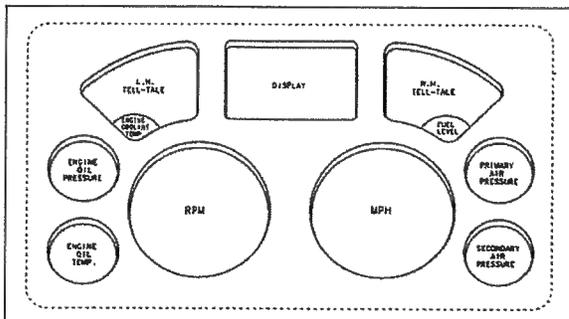
**Non Compliance:** Non-compliance with 49CFR571. 101, Controls and Displays. According to table 2, the low brake air pressure indicator must have the words "Brake Air". The Mack Trucks in question have warnings, both visual and audible, but the words used for the telltale are not an exact match to the requirement, "Brake Air".

**Scope:** Approximately 171,115  
MACK/ANTHEM (AN)/2018-2019  
MACK/GRANITE (GU)/2007-2019  
MACK/LR/2016-2019  
MACK/PINNACLE (CHU)/2007-2019  
MACK/PINNACLE (CXU)/2007-2019  
MACK/TERRAPRO (LEU/MRU)/2007-2019  
MACK/TITAN (TD)/2009-2018

**Data/Views/Arguments:**

As Mack provides both a visual and audible alarm along with an air pressure gauge, we feel that our vehicles, even though non-compliant, meet the intent of the regulation to provide a clear and visible warning to the driver when the air pressure in the service reservoir system is below 60 psi. Provided below is summary of the telltales and gauges used on Mack products.

For Granite, Pinnacle, and Titan model vehicles that are 2018 and earlier, the display includes two gauges and a red low air pressure indicator lamp for each gauge. When a low air pressure situation occurs, the driver is warned through the gauge, a red indicator lamp in each gauge, and an audible warning.



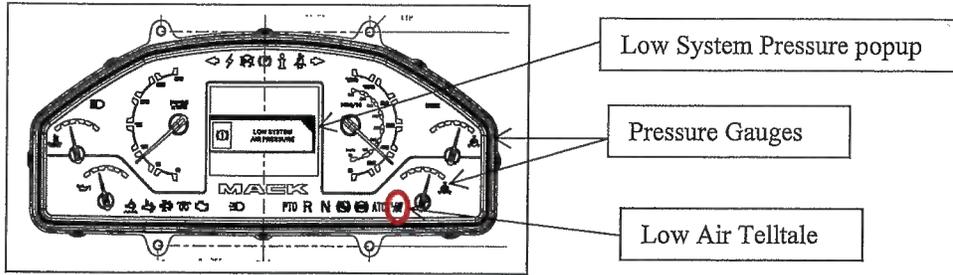
**Primary Brake Air Pressure Telltale**



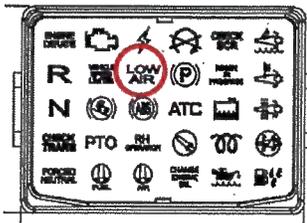
**Secondary Brake Air Pressure Telltale**



For Mack LR model vehicles, two pressure gauges, low air telltale, popup in the display, and an audible alarm are provided.



On Mack TerraPro model vehicles, pressure gauges, low air telltale, and an audible alarm are provided. Shown below is the low air telltale.



On 2019 and later Anthem, Pinnacle, and Granite model vehicles, pressure gauges, a low air pressure popup, and an audible alarm are provided. Shown below is the low air pressure popup.



As there are no adverse impacts to safety, Mack Trucks feels that this should be treated as an inconsequential non-compliance.

Thank you for your time and consideration.

Signed: *P. Sal* Date: 10/9/18

# Part 573 Safety Recall Report

# 18V-549

**Manufacturer Name :** Mack Trucks, Inc.

**Submission Date :** AUG 23, 2018

**NHTSA Recall No. :** 18V-549

**Manufacturer Recall No. :** n/a



## Manufacturer Information :

## Population :

**Manufacturer Name :** Mack Trucks, Inc.

**Number of potentially involved :** 171,115

**Address :** 2100 Mack Boulevard

**Estimated percentage with defect :** 100 %

PO Box M Allentown PA 18105-5000

**Company phone :** 610-709-2131

## Vehicle Information :

**Vehicle 1 :** 2007-2019 Mack Anthem, Granite, LR, Pinnacle, TerraPro, Titan

**Vehicle Type :** BUSES, MEDIUM & HEAVY VEHICLES

**Body Style :** OTHER

**Power Train :** DIESEL

**Descriptive Information :** Certain 2007-2019, Granite, Pinnacle, and TerraPro model vehicles

Certain 2018 and 2019 Anthem model vehicles

Certain 2016-2019 LR model vehicles

Certain 2009-2018 Titan model vehicles

**Production Dates :** FEB 13, 2006 - AUG 13, 2018

**VIN Range 1 : Begin :**

NR

**End :** NR

Not sequential

## Description of Noncompliance :

**Description of the Noncompliance :** The low brake air pressure warning is not identified according to the regulation. Must use the words "Brake Air" for the warning indicator.

**FMVSS 1 :** 101 - Control and displays

**FMVSS 2 :** NR

**Description of the Safety Risk :** No safety risk

**Description of the Cause :** Oversight- used other wording such as "Low Air" and "System Air Pressure is low"

**Identification of Any Warning that can Occur :** n/a

**Supplier Identification :****Component Manufacturer**

Name : NR  
Address : NR  
NR  
Country : NR

**Chronology :**

July 9, 2018 Potential non-compliance reported to Regulatory Affairs department. Investigation opened  
August 9, 2018 Product Safety Committee meets and determines that a noncompliance exists  
August 16, 2018 Non-compliance reported to NHTSA

**Description of Remedy :**

Description of Remedy Program : n/a Inconsequential non-compliance petition will be submitted.  
How Remedy Component Differs from Recalled Component : n/a Inconsequential non-compliance petition will be submitted.  
Identify How/When Recall Condition was Corrected in Production : Corrective action was introduced on August 13, 2018

**Recall Schedule :**

Description of Recall Schedule : n/a Inconsequential non-compliance petition will be submitted.  
Planned Dealer Notification Date : NR - NR  
Planned Owner Notification Date : NR - NR

\* NR - Not Reported