



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 Volvo Trucks North America, 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
Office: (336) 393-2233
Mobile: (336) 457-2263

Information Required per 49CFR566

Full Name of Applicants:

Volvo Trucks North America
7900 National Service Rd.
Greensboro, NC 27409

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

From our part 566 filing:

Volvo Trucks North America (“Volvo”) 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 Volvo vehicles in question have warnings, both visual and audible, but the words used for the indicator are not an exact match to the requirement, “Brake Air”.

Scope: Approximately 219,891 vehicles

VOLVO/VAH/2007-2019

VOLVO/VHD/2007-2019

VOLVO/VNL/2007-2019

VOLVO/VNM/2007-2018

VOLVO/VNR/2018-2019

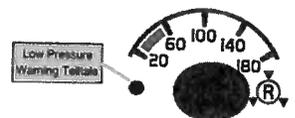
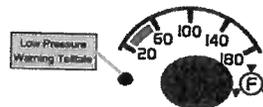
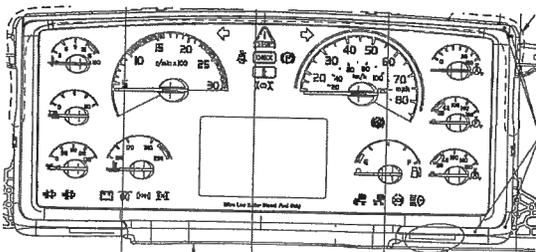
VOLVO/VNX/2014-2019

VOLVO/VT/2007-2010

Data/Views/Arguments:

As Volvo 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 Volvo products.

For 2007- 2019 models, the display includes two gauges, and 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.



On all models and model years, a pop-up is provided in addition to the gauges, low pressure indicator, and audible alarm. Provided below is an illustration showing the popup message.



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

Thank you for your time and consideration.

Signed: _____

A handwritten signature in black ink, appearing to be "P. P. Se".

Date: _____

10/9/18

Part 573 Safety Recall Report

18V-544

Manufacturer Name : Volvo Trucks North America**Submission Date :** AUG 23, 2018**NHTSA Recall No. :** 18V-544**Manufacturer Recall No. :** n/a**Manufacturer Information :**

Manufacturer Name : Volvo Trucks North America

Address : 7900 National Service Road

Greensboro NC 27409

Company phone : 800 528 6586

Population :

Number of potentially involved : 219,891

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2007-2019 Volvo VAH, VHD, VNL, VNM, VNR VNX, VT

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style : OTHER

Power Train : DIESEL

Descriptive Information : Certain 2007-2019 VAH, VHD, VNL, VNM model vehicles
 Certain 2018-2019 VNR model vehicles,
 Certain 2014- 2019 VNX model vehicles
 Certain 2007-2010 VT 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