



November 2, 2019

Acting Administrator, James C. Owens  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Re: 19V-723, Petition for Inconsequential Non-Compliance, Controls and Displays**

Dear Mr. Owens,

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

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

Cc. Otto Matheke

## **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. Certain controls are not identified with the symbol or word as stated in the regulation. These controls include the HVAC fan control (Anthem, Pinnacle, and Granite), the position side marker light control (Anthem, Pinnacle, Granite, and LR), the master lighting switch control (LR), and the turn signal control (LR).

Mack Trucks views these non-compliances as inconsequential to the safe operation of the vehicle. There are no customer complaints, field reports, warranty claims, or accidents associated with these non-compliances.

**Scope:** There are approximately forty seven thousand seven hundred forty-two (47,742). The models and model years affect include 2019-2020 Anthem, Granite, and Pinnacle model vehicles, and 2016-2020 LR model vehicles.

**Data/Views/Arguments:**

The table below includes the control, the requirement, the non-compliance, and the arguments on why it is inconsequential to motor vehicle safety.

Control	Requirement	Non-compliance	Arguments
Heating and Air Conditioning Fan control	Control must be labeled with the fan symbol  or the word "fan"	The required symbol or the word "fan" is not on the control. See illustration 1.	<ol style="list-style-type: none"> <li>1. The rotary control has numbers 0 to 4 and is located on the HVAC panel; therefore, it is obvious to the driver that the control is for the fan speed.</li> <li>2. The owner's manual shows the control and informs that the control is the fan speed.</li> </ol>
Position side marker, end-outline marker, identification, or clearance lamps control	Control must be labeled with the symbol  or the words "Marker Lamps" or "MK Lps"	Control use the symbol  as the identifier. See illustration 2.	<ol style="list-style-type: none"> <li>1. The rotary control has a symbol that indicates that the position is for the parking lights. The position in the sequence makes it discernible to the driver.</li> <li>2. The owner's manual shows the control and informs that the control position with symbol  is for the marker lamps.</li> </ol>
Master Lighting Control	Control must be labeled with the symbol  or the word "lights"	Control is not identified with the symbol or word. See illustration 3.	<ol style="list-style-type: none"> <li>1. The control is a three-position toggle switch and includes the low beam headlight symbol and the parking light symbol and therefore is discernible to the driver.</li> <li>2. The owner's manual includes information on the control and its purpose.</li> </ol>
Turn Signal control	Control must be labeled with the arrow symbols  or 	Control is not identified with the required symbol. See illustration 4.	<ol style="list-style-type: none"> <li>1. The control is the standard lever control located on the steering column and therefore discernible to the driver.</li> <li>2. The owner's manual includes information on the control and its purpose.</li> </ol>

**Non-Compliances per model**

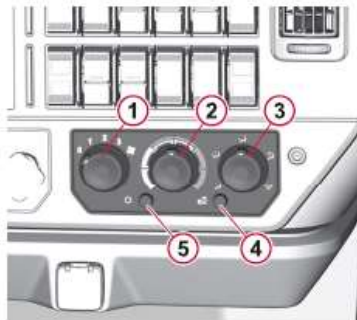
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Illustration 1: (Symbol for fan control not provided)



From owner's manual:

### Cab Climate Control



- 1 Blower Control Knob
- 2 Temperature Control Knob
- 3 Mode Knob
- 4 Fresh/Recirculation Button
- 5 A/C ON/OFF Button

- 1 **Blower Control Knob**  
This knob controls fan speed from OFF to 4 (highest speed).
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Controls the temperature of the air in the cab from COOL (far left) to HOT (far right).
- 3 **Mode Selection Knob** Controls the direction of air flow around the cab seen below.

Illustration 2: (Incorrect symbol used for marker lamp position)



From owner's manual:

### Light Control Panel

This panel controls the parking lights, interior panel lights, headlights and fog lights (if equipped).

ⓘ NOTE

If the LCP is in OFF or park position and the windshield wiper is active for longer than 5 sec (programmable parameter), headlights will come on.



- 1 DRL Disabled
- 2 OFF Position
- 3 Marker Lamps
- 4 Headlamps and Marker Lamps

X Publication\_PC28

Illustration 3: (Master Lighting Switch not identified with required symbol or word).



Illustration 4: (Turn signal switch not identified with required symbol)



As there are no adverse impacts to safety, Mack Trucks respectfully requests that these be considered as inconsequential non-compliances.

Thank you for your time and consideration.

Signed:

A handwritten signature in black ink, appearing to be "P. P. [unclear]", with a long horizontal line extending to the right.

Date: November 2, 2019



May 29, 2020

Acting Administrator, James C. Owens  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Re: 19V-723, Petition for Inconsequential Non-Compliance, Controls and Displays**  
Amended to remove turn signal switch. Replaces November 2, 2019 petition.

Dear Mr. Owens,

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

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

With Best Regards,

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





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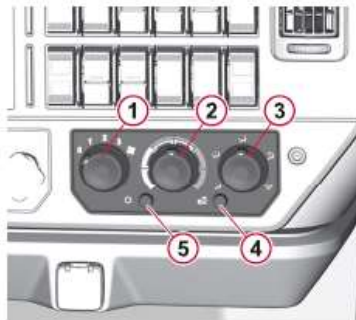
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Illustration 1: (Symbol for fan control not provided)



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Illustration 2: (Incorrect symbol used for marker lamp position)



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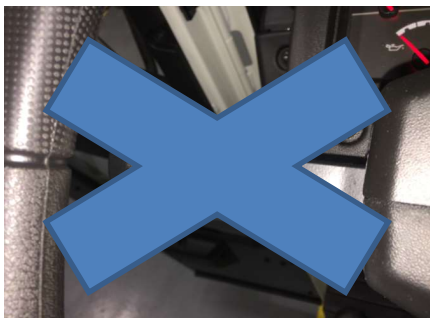
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X Publication\_PC28

Illustration 3: (Master Lighting Switch not identified with required symbol or word).



Illustration 4: (Turn signal switch not identified with required symbol)



As there are no adverse impacts to safety, Mack Trucks respectfully requests that these be considered as inconsequential non-compliances.

Thank you for your time and consideration.

Signed:

A handwritten signature in black ink, appearing to be 'P. P. [unclear]', with a long horizontal stroke extending to the right.

Date: ~~November 2, 2019~~ May 29, 2020



July 9, 2020

Acting Administrator, James C. Owens  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Re: 19V-723, Petition for Inconsequential Non-Compliance, Controls and Displays**  
Amended to remove all references to turn signal switch. Replaces November 2, 2019 petition

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



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- 1 DRL Disabled
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X Publication\_PC28

Illustration 3: (Master Lighting Switch not identified with required symbol or word).



Class 7 & 8 vehicles require that the driver have a Commercial Driver's License (CDL) to operate the vehicle.

As there are no adverse impacts to safety, Mack Trucks respectfully requests that these be considered as inconsequential non-compliances.

Thank you for your time and consideration.

Signed:

A handwritten signature in black ink, appearing to be "R. Pal" followed by a long horizontal line extending to the right.

Date: July 9, 2020

# Part 573 Safety Recall Report

# 19V-723

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

**Submission Date :** OCT 09, 2019

**NHTSA Recall No. :** 19V-723

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



## Manufacturer Information :

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

**Address :** 2100 Mack Boulevard

PO Box M Allentown PA 18105-5000

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

## Population :

**Number of potentially involved :** 47,742

**Estimated percentage with defect :** 100 %

## Vehicle Information :

**Vehicle 1 :** 2016-2020 Mack Anthem, Granite, LR, and Pinnacle

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

**Body Style :** OTHER

**Power Train :** DIESEL

**Descriptive Information :** The model years and models affected include 2018 – 2020 Anthem, Granite, and Pinnacle model vehicles; 2016-2020 LR model vehicles.

The population of affected vehicles was determined based on component part numbers.

**Production Dates :** JUL 12, 2015 - OCT 03, 2019

**VIN Range 1 : Begin :**

NR

**End :** NR

Not sequential

## Description of Noncompliance :

**Description of the Noncompliance :** Certain controls are not identified with the symbol or word as stated in the regulation. These controls include the HVAC fan control (Anthem, Pinnacle, and Granite), the position side marker light control (Anthem, Pinnacle, Granite, and LR), the master lighting switch control (LR), and the turn signal control (LR)

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

**FMVSS 2 :** NR

**Description of the Safety Risk :** Mack Trucks views these non-compliances as inconsequential to the safe operation of the vehicles.

There are no customer complaints, field reports, warranty claims, or accidents associated with these non-compliances.

**Description of the Cause :** Design-related oversight

Identification of Any Warning NR  
that can Occur :

## Supplier Identification :

### Component Manufacturer

Name : NR  
Address : NR  
NR  
Country : NR

## Chronology :

May 22, 2019 Potential issues identified.  
May 23, 2019 Investigation opened  
August 12, 2019 Preliminary investigation results provided to Product Safety Working Group for consideration.  
Additional information requested.  
September 25, 2019 Investigation findings finalized and provided to Product Safety Working Group for consideration.  
October 1, 2019 Investigation findings raised to the Mack Product Safety Committee for decision.  
October 3, 2019 Mack Product Safety Committee determines non-compliances.  
October 9, 2019 Mack submits non-compliance report to NHTSA.

## Description of Remedy :

Description of Remedy Program : Mack is submitting a petition for an inconsequential non-compliance.  
How Remedy Component Differs from Recalled Component : Mack is submitting a petition for an inconsequential non-compliance.  
Identify How/When Recall Condition was Corrected in Production : The issue will be corrected in production by the end of October. Vehicles in our possession will be held until the non-compliances are addressed.

## Recall Schedule :

Description of Recall Schedule : Mack is submitting a petition for an inconsequential non-compliance.  
Planned Dealer Notification Date : NR - NR  
Planned Owner Notification Date : NR - NR

\* NR - Not Reported

# Part 573 Safety Recall Report

# 19V-723

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

**Submission Date :** MAY 29, 2020

**NHTSA Recall No. :** 19V-723

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



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May 29, 2020 Revised Defect report by removing reference to LR Turn Signal switch identification. The turn signal control is on the left side of the steering wheel and parallel to the face plane of the steering wheel in its normal driving position. Petition for inconsequential non-compliance has been revised and re-submitted.

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