

# Part 573 Safety Recall Report

# 20V-578

**Manufacturer Name :** Motor Coach Industries**Submission Date :** SEP 23, 2020**NHTSA Recall No. :** 20V-578**Manufacturer Recall No. :** SB 490**Manufacturer Information :**

Manufacturer Name : Motor Coach Industries

Address : 200 East Oakton Street

Des Plaines IL 60018

Company phone : 1-800-241-2947

**Population :**

Number of potentially involved : 56

Estimated percentage with defect : 100 %

**Vehicle Information :**

Vehicle 1 : 2019-2019 MCI D45CRT-LE

Vehicle Type : BUSES, MEDIUM &amp; HEAVY VEHICLES

Body Style : OTHER

Power Train : DIESEL

**Descriptive Information :** To comply with FMVSS 208, MCI coaches are built with 3-point passenger seat belts that have an emergency locking retractor (ELR) and automatic locking retractor (ALR) on the seat belts. Kiel N.A., L.L.C. (Kiel) has notified MCI that Kiel has filed an equipment recall (20E-054) with respect to certain rear cross (last row) passenger seats. Kiel advises that due to a design issue the seat belt may not switch back from the ALR function to the ELR function. As a result, the seat belt may be rendered unusable and not compliant with FMVSS 209.

Production Dates : APR 01, 2019 - JAN 23, 2020

VIN Range 1 : Begin :

NR

End : NR

 Not sequential**Description of Noncompliance :**

**Description of the Noncompliance :** Kiel advises that due to a design issue the seat belt installed in the recalled rear cross seats may not switch back from the ALR function to the ELR function. As a result, the seat belt may be rendered unusable and not compliant with FMVSS 209. The lack of passenger seat belt availability is a noncompliance to FMVSS 208.

FMVSS 1 : 208 - Occupant crash protection

FMVSS 2 : 209 - Seat belt assemblies

**Description of the Safety Risk :** The inability to use the seat belt could increase the risk of personal injury in the event of a collision.

**Description of the Cause :** Kiel reports that the mounting location of the seat belt retractor on the rear cross seat chassis is reducing the length of the webbing required for switching back from ALR to ELR mode after activation.

**Identification of Any Warning that can Occur :** Kiel reports that the seat belt would not pull out or retract when attempting to switch back from ALR to ELR mode after activation.

## Involved Components :

**Component Name 1 :** Seat belt assembly

**Component Description :** Seat chassis

**Component Part Number :** Kiel 177302, 177303, 158777, 158778

## Supplier Identification :

### Component Manufacturer

**Name :** Kiel N.A., L.L.C.

**Address :** 2009 Middlebury Street  
Elkhart INDIANA 46516

**Country :** United States

## Chronology :

On 9/27/19, MCI received reports of passenger seat belts not extending on vehicles with Kiel passenger seats. MCI notified Kiel, provided Kiel with the defective seat belts that had been removed, and requested that Kiel investigate.

On 10/10/19, Kiel advised that initial testing indicated a possible problem with the ALR function of the retractor.

On 10/29/19, Kiel advised that analysis of the defective seat belt assemblies indicated that the ELR function of the retractor was functioning properly until the ALR was activated; that the cause of the seat belt not extending was the ALR function of the seat belt retractor not releasing when the seat belt was released to be stowed; and that the problem with the ALR function was not intermittent, that if the seat belt could be extended and otherwise functioned properly, it would continue to do so.

On 11/4/19, Kiel advised that on the seat belts returned for analysis, the potential issue with the ALR not functioning properly was that it might be activating too early, thus preventing the seat belt from fully extending.

In Nov 2019, MCI and Kiel inspected other vehicles with Kiel passenger seats. Seat belts that were not functioning properly were removed and replaced, and provided to Kiel for further analysis.

On 11/22/19, Kiel advised MCI that Kiel did not consider the defective seat belts to be a safety issue, and that the problem was limited to a specific batch of seat belts.

MCI and Kiel inspected additional vehicles with seat belts within and outside the batch identified by Kiel. Additional defective seat belts were found on vehicles in both groups.

In Feb 2020 MCI requested that Kiel conduct an equipment recall. Kiel failed to do so, and after discussions with NHTSA, MCI decided to conduct a vehicle recall to remedy the defective Kiel seat belts. See recall 20V-242. On Aug 10, 2020, Kiel notified MCI of Kiel's equipment recall 20E-054 pertaining to certain Kiel rear cross seat belts.

### Description of Remedy :

Description of Remedy Program : Kiel reports that it will modify all affected rear cross seats at Kiel's expense.

How Remedy Component Differs from Recalled Component : Kiel reports that the remedied rear cross chassis will have an extension installed.

Identify How/When Recall Condition was Corrected in Production : Kiel reports that a modified rear cross chassis mounting location for the belt retractor will be implemented prior to any further production.

### Recall Schedule :

Description of Recall Schedule : MCI will mail customer notification letters and service bulletins within seven (7) days after NHTSA approval.

Planned Dealer Notification Date : OCT 23, 2020 - OCT 23, 2020

Planned Owner Notification Date : OCT 23, 2020 - OCT 23, 2020

\* NR - Not Reported