



Express

Extremely Urgent

ORIGIN ID: AIXA (336) 543-9288
 CHERYL BROWN
 7900 NATIONAL SERVICE RD
 GREENSBORO, NC 27409
 UNITED STATES US

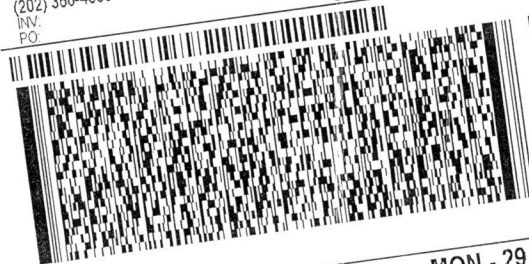
SHIP DATE: 26MAR21
 ACTWGT: 0.50 LB
 CAD: 250585172/INET4340

BILL SENDER

TO ACTING ADMINISTRATOR- STEVEN CLIFF
 NATIONAL HWY. TRAFFIC SAFETY ADMIN
 WEST BLDG W41-227
 1200 NEW JERSEY AVENUE
 WASHINGTON DC 20590

REF: VOLVO GRP TRKS LLC 21V-136

(202) 366-4000
 INV. PO. DEPT



MON - 29 MAR 4:30P
STANDARD OVERNIGHT

TRK# 7732 8016 8143
0201

XC WASA

20590
DC-US IAD



Insert shipping document here.

NTSA-210331-003

After printing this label:
1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.

Volvo Trucks



March 26, 2021

Acting Administrator, Steven Cliff
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

Re: 21V-136, Petition for Inconsequential Non-Compliance, Controls and Displays

Dear Mr. Cliff,

On behalf of Volvo Group North America LLC, I respectfully submit this petition for your consideration. I appreciate yours and NHTSA's consideration of this matter.

A copy of this document has been uploaded to the recall portal under 21V-136. The original signed document and copies were sent by overnight courier on March 26, 2021.

Best Regards,

A handwritten signature in dark ink, appearing to read "Tim LaFon", with a long horizontal flourish extending to the right.

Tim LaFon
Vice President Regulatory Affairs
Email: timothy.lafon@volvo.com
Office/ Mobile: (336) 457-2263

Information Required per 49CFR556

Full Name of Applicants:

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

Nature of Business: Vehicle Manufacturer, Corporation

State: North Carolina

Description of motor vehicles or items of motor vehicle equipment involved:

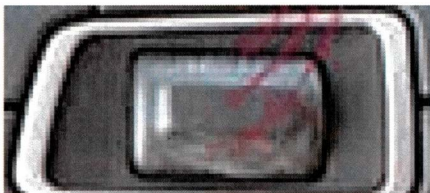
- Brand: Volvo
- Models: Certain 2015 – 2021 VAH, VHD, VNL, VNM, and VNR class 8 trucks and truck-tractors
- Manufacturing Dates: December 16, 2014 through December 21, 2020 with steering wheel mounted cruise control switch (part number 82779770)
- Total number of vehicles involved: 72,239

Description of non-compliance:

Vehicles with a Gross Vehicle Weight Rating of 4,536 kg or greater were subject to Standard 101, Controls and displays (reference 49cfr571.101) on September 1, 2013. The trucks and truck tractors in question have cruise controls on the steering wheel that according to Standard 101 should be labeled for each position of the switch. The specific section of the regulation is,

S5.2.8 Each control for an automatic vehicle speed system (cruise control) and each control for heating and air conditioning systems must have identification provided for each function of each such system.

Provided below is a picture of the cruise control switch and the solution.



Not compliant



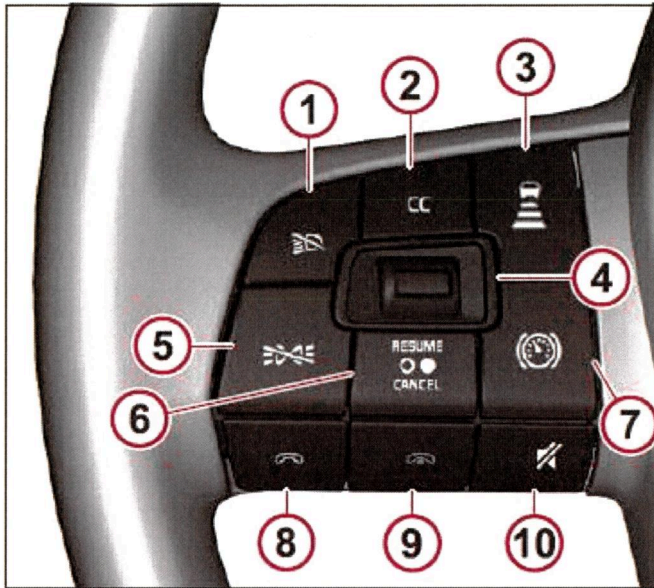
Compliant(solution)

The switch operation is push down to set after cruise control is activated by another switch. To increase speed, rotate upward and to decrease speed rotate downward.

Period of Exemption Requested: Volvo is petitioning that all vehicles in the affected population be exempt from the recall requirements as the non-compliance is inconsequential to motor vehicle safety.

Arguments:

Provided below is an illustration showing the layout of the steering control panel where the switch in question (4) is located.



- 1 Headlamp Interrupt
- 2 Cruise Control On/Off
- 3 Cruise Control Following Distance
- 4 Toggle/Scroll Up/Down/Enter
- 5 Marker Interrupt
- 6 Cruise Cancel/Set

The cruise on and off (button 7) is just the right of the switch in question (4). Considering the proximity of the switch to the cruise control on and off, cancel and resume buttons, the switches function is self-explanatory. Also, this type of switch is commonly used for this function and the function of the switch is explained in the operator's manual (see Excerpt 1).

Signed: Tim LaFon

Date: March 26, 2021

Excerpt 1

STEERING WHEEL CONTROLS

Left-Hand Controls

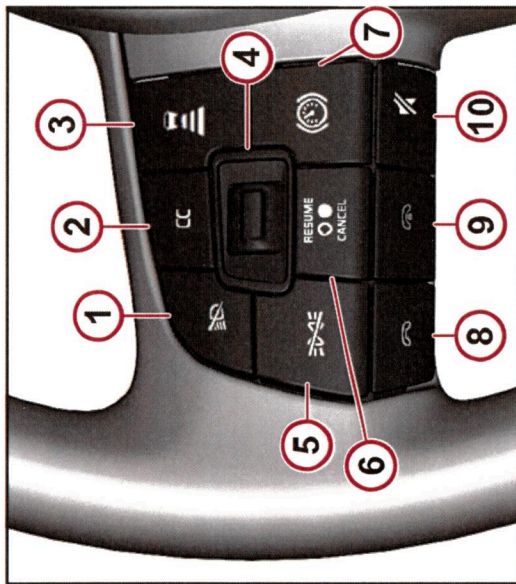
When either switch is pressed, the corresponding lights toggle from their current state. If OFF they change to ON and if ON they change to OFF. When pressed for more than 3 seconds, the lights revert automatically to the initial state.

Phone/Bluetooth controls
The Phone/Bluetooth option allows the driver to sync a mobile phone with the vehicle's speaker system via Bluetooth. The two buttons for this option are located about the Radio control button.

Incoming or Ending Call
To answer an incoming phone call, press the button with the green phone. To end a current phone call, press the button with the red phone.

Cruise Control

For additional information on operating the cruise control, refer to the Cruise Control section.

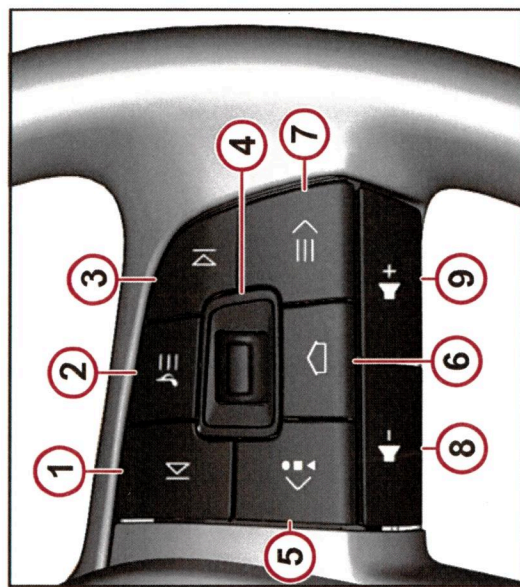


- 1 Headlamp Interrupt
- 2 Cruise Control On/Off
- 3 Cruise Control Following Distance
- 4 Toggle/Scroll Up/Down/Enter
- 5 Marker Interrupt
- 6 Cruise Cancel/Set
- 7 Engine Brake Cruise On/Off
- 8 Accept Call (Green)
- 9 End Call (Red)
- 10 Mute Call/Radio

Right-Hand Controls

Press +, up or -, down to change the radio volume.

Press the switch left or right to change radio stations. The radio will seek the next station with a strong signal.



- 1 Seek Left
- 2 Radio Mode
- 3 Seek Right
- 4 Toggle/Scroll Up/Down/Enter
- 5 Applications/Left
- 6 Home
- 7 Options/Back/Right
- 8 Volume Down
- 9 Volume Up