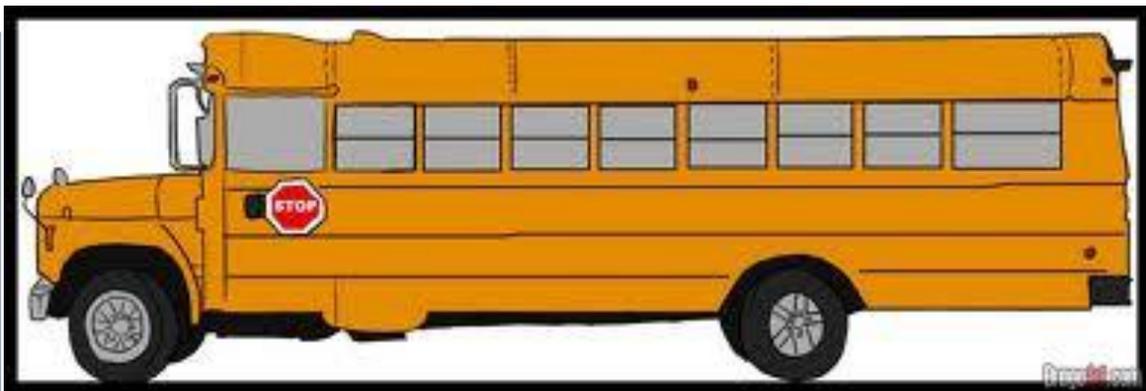


Guidelines To Performing Open Recalls on School Buses



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OVERVIEW

In early 2012, the Pupil Transportation Unit (PTU) conducted an investigation into outstanding recalls on school buses in Manitoba's public school system. Each school bus dealer was contacted and asked to provide a list of open recalls not yet performed on its school buses. The information gathered showed a high percentage of recalls not completed. The next step in the process was to proceed in finding the cause for these repairs not being completed. It was found through our discussions with dealers and school division staff that multiple factors contributed to the open recalls. It appears that all parties are somewhat responsible for the failure of getting these recalls completed in a timely manner.

This guide is intended to provide school divisions with a process to ensure recalls are corrected in a timely manner at their local bus garage or dealership. It is vital that divisions provide the safest school bus vehicle possible as they transport students daily to school.

TRANSPORT CANADA'S RESPONSIBILITY (excerpt from Transport Canada website)

Transport Canada is responsible for regulating the safety of newly manufactured vehicles sold in Canada. However, the safety of the vehicles that travel Canada's roadways on a daily basis also rests with vehicle owners, which include individual Canadians, as well as fleet operators, car rental companies, and used car dealerships. Vehicle owners have a responsibility, not only for their own personal safety, but for that of the drivers of their vehicles, their passengers, any subsequent owners, and other road users.

Although Transport Canada does not regulate the actions of vehicle owners, it urges them to have recall repairs that may apply to their passenger cars, multi-purpose passenger vehicles, and trucks carried out as soon as possible after receiving notification of a defect from the manufacturer.

To read more please visit the following link:

<http://www.tc.gc.ca/eng/roadsafety/safevehicles-defectinvestigations-index-76.htm>

Scroll down to the link "The Importance of having recalled vehicles repaired"

NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION (NHTSA)

Primarily, there are two types of recalls: safety related and non-safety related as indicated in the following excerpts from the NHTSA website. In either case, school divisions must be proactive in getting recalls completed in a timely manner. It is imperative that documentation be kept for any work completed.

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When is a recall necessary?

- When a motor vehicle or item of motor vehicle equipment (including tires) does not comply with a Federal Motor Vehicle Safety Standard.
- When there is a safety-related defect in the vehicle or equipment.

Federal Motor Vehicle Safety Standards set minimum performance requirements for those parts of the vehicle that most affect its safe operation (brakes, tires, lighting) or that protect drivers and passengers from death or serious injury in the event of a crash (air bags, safety belts, child restraints, energy absorbing steering columns, motorcycle helmets). These Federal Standards are applicable to all vehicles and vehicle-related equipment manufactured or imported for sale in the United States (including U.S. territories) and certified for use on public roads and highways.

What is a safety-related defect?

The United States Code for Motor Vehicle Safety (Title 49, Chapter 301) defines motor vehicle safety as “the performance of a motor vehicle or motor vehicle equipment in a way that protects the public against unreasonable risk of accidents occurring because of the design, construction, or performance of a motor vehicle, and against unreasonable risk of death or injury in an accident, and includes nonoperational safety of a motor vehicle.” A defect includes “any defect in performance, construction, a component, or material of a motor vehicle or motor vehicle equipment.” Generally, a safety defect is defined as a problem that exists in a motor vehicle or item of motor vehicle equipment that:

- poses a risk to motor vehicle safety, and
- may exist in a group of vehicles of the same design or manufacture, or items of equipment of the same type and manufacture.

Examples of defects considered safety-related

- Steering components that break suddenly causing partial or complete loss of vehicle control.
- Problems with fuel system components, particularly in their susceptibility to crash damage, that result in leakage of fuel and possibly cause vehicle fires.
- Accelerator controls that may break or stick.
- Wheels that crack or break resulting in loss of vehicle control.
- Engine cooling fan blades that break unexpectedly causing injury to persons working on a vehicle.
- Windshield wiper assemblies that fail to operate properly.
- Seats and/or seat backs that fail unexpectedly during normal use.
- Critical vehicle components that fall apart, or separate from the vehicle, causing potential loss of vehicle control or injury to persons inside or outside the vehicle.
- Wiring system problems that result in a fire or loss of lighting.
- Car ramps or jacks that may collapse and cause injury to someone working on a vehicle.

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- Air bags that deploy under conditions for which they are not intended to deploy.
- Child safety seats that contain defective safety belts, buckles, or components that create a risk of injury, not only in a vehicle crash but also in non-operational safety of a motor vehicle.

Examples of defects NOT considered safety-related

- Air conditioners and radios that do not operate properly.
- Ordinary wear of equipment that has to be inspected, maintained, and replaced periodically, including shock absorbers, batteries, brake pads and shoes, and exhaust systems.
- Non-structural or body panel rust.
- Quality of paint or cosmetic blemishes.
- Excessive oil consumption.

COMMUNICATING WITH VENDORS

It should be noted that school bus manufacturers depend on outside vendors to supply different components on the bus. The following list provides a few examples:

- Engines
- Stop Arms
- Crossing Arms
- Roof Hatches
- Booster Pumps
- Inside Heaters
- Inside and Outside Mirrors
- Transmissions
- Wheelchair Lifts
- Auxiliary Diesel Heaters

At times confusion may happen when the vendor of a product puts out the recall and notifies the school bus manufacturer (as required by law). Manufacturers are responsible for informing customers about a recall. As per instructions in the recall letter, the school division **may** work directly with the vendor to receive parts or labour reimbursement.

It is recommended that school divisions always follow instructions provided in the manufacturer's recall letter. It is also good practice to forward the completed work to the dealer with the repair order and recall number indicating the work has been completed. Following through with this step is vital to ensuring that a manufacturer's database is updated. Divisions may be required to hold onto defective parts until given instruction to discard them. Review the recall letter closely. This will help eliminate the possibility of something being missed.

IMPORTANT !!

Manitoba school divisions should work directly with the school bus dealer who administers the repairs and lets manufacturers know the recalls are completed. If you receive recall notification cards on any bus product, it is good practice to contact the local dealer for further assistance.

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TOP FACTORS FOR OPEN RECALLS NOT BEING COMPLETED

There are many potential factors for recalls not being completed. In conducting PTU's investigation, the following were most often found to reoccur. (Note: These factors are numbered only to reference them; they are not listed by the number of times reported.)

1. Dealer not checking for open recalls and therefore not correcting the issue when bus comes into the dealership for repair.
2. Internal communication breakdown between the dealer and manufacturer.
3. Contact information such as mailing addresses or ownership changes is incorrect. School divisions not providing manufacturers and/or dealers with current information.
4. Recall information is not received by the school division staff responsible for passing on the information, or technicians not using manufacturers' websites to check for open recalls.
5. Technicians are performing the repairs, but failing to send paperwork to the dealer indicating the work has been completed.

Factors 1 and 2 - Dealer/Manufacturer Communication

The first two factors listed above have been addressed with all of Manitoba's school bus dealers. Each has indicated they will check all buses coming into their respective shops or mobile service centres for any open recalls. Divisions can also access the manufacturer's website and make mention of the recall when the bus goes into the dealership for service.

Note: *The remaining factors are the responsibility of the school division to ensure corrections are made as required.*

Factor 3 - Incorrect Contact Information

It is the school division's responsibility to notify body and/or chassis manufacturers of any address or contact information changes. (Note: In the case of separate suppliers - e.g. Blue Bird body with IHC chassis - both dealers and/or manufacturers will need to be notified of changes). As well, engine and transmission vendors, or vendors of any registered item, should be notified of changes.

PTU's investigation found school buses on the manufacturers' databases registered to school divisions which are no longer in existence. Failing to have the proper mailing address or contact information may delay receipt of recall information, or worse, it may not be received at all, thereby increasing a school division's liability should a serious incident occur. (Appendix A and B includes forms which could be used to convey updated information.)

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Correction:

School divisions must put a plan in place to review their current fleet for the correct address for each bus to ensure information is getting to the proper owner. This can be done in the following ways:

- Log into the manufacturer's website and review the information. (Contact information for manufacturers, dealers, and vendors can be found in Appendix C.)
- If you cannot access the website, provide the dealer with a list of vehicles and VIN numbers to verify the correct address for each vehicle. In some cases you may need the engine and transmission serial numbers depending on the setup of your fleet.
- Advise manufacturers and/or dealers of mailing address or school division contact changes immediately.

IMPORTANT !!

If taking a bus out of inventory and selling it, notify the manufacturer and/or dealer about the ownership change. This notification is essential so the new owner can be contacted if a safety recall is issued.

Factor 4 - Recall information not being received by personnel responsible for ensuring work is completed; school bus technicians not checking manufacturers' websites for outstanding recalls

In discussions with school bus maintenance staff it was discovered that many technicians were unaware of outstanding recalls on their units. The two main reasons: hard copies (or recall notification cards) of the recalls were not forwarded to the school bus garage; or school bus maintenance staff are not checking manufacturers' websites for open recalls.

Correction:

Ideally, recall notification cards and letters are mailed to school divisions directly from the manufacturer (hence the reason for the correct contact information mentioned earlier). This information should then be passed on immediately to bus maintenance staff so repairs can be completed. It is recommended that transportation staff review the procedure on how this information is distributed internally at the school division level.

All dealers have been instructed to communicate (whether by mail, email, or telephone) with the school division's transportation supervisor or director of transportation as indicated in Manitoba Education and Training's School Board Contact List:
http://www.edu.gov.mb.ca/k12/schools/sb_contacts.html

Communication with one individual allows for the most consistent flow of information.

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The majority of school bus technicians contacted indicated they do not have a process in place for checking open recalls. School bus technicians need to implement a strategy to ensure all school buses coming into the shop for repair are checked on a regular basis. Most manufacturers provide the school division with information on how to check online for open recalls, service updates, etc. The information gives the name or number of the recall and the steps to correct it. Most recalls can be performed at the local bus garage; however, some may require that the bus be sent to the dealership, or that the dealer send out a technician to perform the repair. Contact your dealer if you need clarification.

The following are suggested guidelines to implement a plan:

- As part of the maintenance program, appoint an individual to be responsible for checking open recalls. Ensure the individual is aware of how to access and view the information online. If questions arise, staff can contact the dealer for assistance.
- It should become standard practice every time the bus comes in for regular service or semi-annual inspection that the technician check for open recalls. It is also recommended this be done a week prior to the scheduled appointment in order to understand the purpose of the recall, and if parts are required, they can be ordered and in stock when the unit comes in for repair (always follow recall instructions prior to ordering parts.)
- In your maintenance checklist include a box or line as a reminder to check for recalls.
- It is imperative that recalls take top priority and not be put off to a later date. All parties involved must ensure the buses are repaired and running safely on our roads.

Factor 5 - Administrative duties and school bus maintenance staff not forwarding work orders to dealer indicating work has been completed

The administration process may not clearly define the technician's responsibilities, or the individual may need assistance in understanding the importance of time management and expectations. PTU found through discussions with technicians that many do not have time allotted for administrative duties. Secondly, when the work is completed, it was found a number of divisions were failing to forward work orders as required by the dealer to indicate the work had been completed. This may also skew the numbers showing up in Transport Canada's database as recalls not being completed.

IMPORTANT !!

The dealer will not submit the work to the manufacturer as being completed unless a work order is provided at the time of submission (verbal reports or general emails will not be accepted). Work orders should be retained in the school bus file for future reference if required. It is recommended that staff review policy or procedures to ensure an efficient process is in place.

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Correction:

The school division may need to review the administrative duties of the person assigned to the responsibility. It is suggested that a time be set daily or weekly for administrative duties for the person responsible for checking and reporting the recall(s) to be completed. It is recommended that staff review the process of forwarding information to the dealer so it can be processed in a timely manner. All dealers can be contacted if additional support is required.

If a school division is unable to perform the repairs due to workload, it has the option of taking the unit to the dealer, or requesting the dealer perform the repairs at the division maintenance facility. With the second option, additional costs may be applied. Contact the dealer for further details.

CONCLUSION

School divisions must take seriously the responsibility of performing recalls to ensure their fleets are maintained properly as per a manufacturer's recommendations and procedures. It is imperative that school divisions put a process in place to address this concern. It all starts with good communication between school division staff, the dealer, and the manufacturer. Take a moment to review your process and look for ways of improving your division's performance to help address this important concern. The important message to remember: We drive 33,000,000 kilometres every year, and transport over 62,000 children every day. They are our future. We must do our part to ensure their safety.

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APPENDICES

APPENDIX A -

School Bus Identification, Component Serial Numbers, and Production Dates

APPENDIX B -

Dealer Notification of Change to Mailing Address

APPENDIX C -

Contact Information for Manufacturers, Dealers, and Vendors

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APPENDIX A - SCHOOL BUS IDENTIFICATION, COMPONENT SERIAL NUMBERS, AND PRODUCTION DATES

The following form could be used to record all pertinent information for a specific bus, and helps keep the information in one place. The completed form could also be used to convey information to manufacturers, dealers, or vendors.

School Division	
Unit Number	
Built Date on Federal Decal	
Body Type	
Body Number	
Chassis Type	
Chassis VIN	
Engine Model (including horsepower)	
Engine Serial Number	
Transmission Model; Serial Number	
Wheelchair Lift Model; Serial Number; Production Date	
Auxiliary Heater Model; Serial Number	
Stop Arm Model; Serial Number; Production Date	
Crossing Arm Model; Serial Number; Production Date	

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APPENDIX B -

DEALER NOTIFICATION OF CHANGE TO MAILING ADDRESS

When a school division changes its mailing address (e.g. Board office move, bus garage move, school division name change), the contact information for every school bus in your fleet will need to be updated with its manufacturer. Supplying the completed form for each unit affected will provide the dealer with current information.

Old Address Information

Unit Number	
VIN Number	
Division Name	
P.O. Box	
Street Number	
City	
Province	
Postal Code	

New Address Information

Unit Number	
VIN Number	
Division Name	
P.O. Box	
Street Number	
City	
Province	
Postal Code	

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APPENDIX C - CONTACT INFORMATION FOR MANUFACTURERS, DEALERS, AND VENDORS

The first place to check for information is always the school bus manufacturer's website. Then proceed to the vendor's website if necessary.

Manufacturer	Dealer	Phone Number	Website Login
Blue Bird	Fairway	1-800-668-0200	http://fairwayspecialty.ca
IC Bus	Maxim	1-204-790-6599	https://evaluate.internationaldelivers.com/service/service_info/welcome.aspx
Thomas Built Buses	Warner Bus	1-800-667-1930	https://www.thomasbusonline.com/Default.aspx
Freightliner	Warner Bus	1-800-667-1930	http://www.accessfreightliner.com/
Ricon Lifts	Fairway; Maxim; Warner Bus	See above	http://www.riconcorp.com Click the support tab at top of page
Espar Heaters	Tereck Diesel	1-877-545-3884	http://www.tereckdiesel.com/index.php
Webasto Heaters	Wajax	1-204-790-6599	Contact dealer for technical support, or visit http://www.techwebasto.com/custsuppreq-2/custsuppreq.html
Safe Fleet	Fairway; Maxim; Warner Bus	See above	http://www.safefleet.net
Allison Transmissions	Wajax	1-877-456-4010	http://www.wajaxpower.com
Cummins	Western Canada Cummins	1-204-632-5470	https://quickserve.cummins.com/info/index.html