

OCT 10 2003

Mr. Rod Nash  
Vice President of Engineering  
Collins Industries, Inc.  
15 Compound Drive  
Hutchinson, KS 67502-4349

Dear Mr. Nash:

This is in reply to your letter dated September 17, 2003 on behalf of Capacity of Texas, which is a subsidiary of Collins Industries, Inc. (Collins), with respect to the early warning reporting regulation, 49 CFR Part 579. This office received your letter on September 26, 2003.

In your letter, you reference and attach two communications from the National Highway Traffic Safety Administration (NHTSA): one was my letter of August 20, 2003 and the other was an e-mail from Bob Squire of NHTSA's Office of Defects Investigation. You stated that "Capacity of Texas is willing to report information on the one hundred or so spotter trucks they build a year that are certified for on highway use." You further stated that if the volume of trucks is so small that only reporting deaths is the appropriate procedure, then you are prepared to follow that directive.

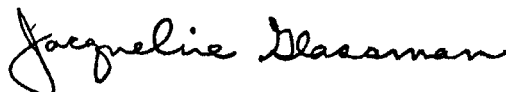
The reference to trucks in your letter is not clear. Collins and its subsidiaries must report according to the aggregate production of each vehicle category. Therefore, we expect Collins or Capacity of Texas to report for each vehicle category for which the aggregate production by Collins and all its subsidiaries and affiliates is 500 or more. Thus, for example, if the spotter trucks are medium-heavy vehicles, and Collins and/or its subsidiaries also manufacture medium-heavy vehicles, the production volumes of all these companies' vehicles must be aggregated to determine whether the companies must report under 49 CFR 579.22 or 579.27.

Please note that the Office of Defects Investigation has amended the manufacturer identification application to cover situations in which a manufacturer is reporting early warning information on behalf of subsidiaries or affiliated companies. Therefore, when

applying for a manufacturer's identification number for early warning reporting, the reporting entity has to identify each parent, subsidiary, or affiliate for which it will be providing information.

If you have any questions regarding this letter, you may phone Andrew DiMarsico of my staff at (202) 366-5263. Any questions on the manufacturer identification application should be presented to Jon White of NHTSA's Office of Defects Investigation, who may be reached at (202) 366-5226.

Sincerely,

A handwritten signature in cursive script that reads "Jacqueline Glassman".

Jacqueline Glassman  
Chief Counsel