

# DAIMLER

Daimler Trucks North America  
Nasser Zamani, P.E.  
Senior Manager  
Compliance and Regulatory Affairs

February 8, 2013

Ms. Jennifer Timian  
Chief, Recall Management Division (NVS-215)  
Office of Defect Investigation, NHTSA  
1200 New Jersey Avenue S.E.  
Washington D.C. 20590

## **Re: Recall 13V-022 Acknowledgement letter**

Dear Ms. Timian,

This is in response to your question reflected in the 13V-022 Recall Acknowledgement Letter. The question was raised whether DTNA "...had sufficient information upon which to make a safety decision more than five business days before filing report with NHTSA."

As a short summary, DTNA received the first field report on August 30, 2012 and began an investigation. The information and test results available between August and mid-December did not indicate an unreasonable risk to motor vehicle safety. In keeping with DTNA quality process, DTNA began making improvements to its product in production and in the field while continuing its investigation. By late December, we concluded the investigation with new field input and elevated the issue through our process for recall considerations. The production and field improvements were completely independent and separate from any safety defect consideration which began late December.

To illustrate the decision process, from August 30th through November 2012, we received 9 reports of instances where vehicles had headlamp circuit breakers reset. The reported behavior of the headlamp circuit breaker was not present in our durability and production units, and when we tried to replicate this failure we found that the vehicle headlamps would operate continuously with no problems. We then tried to operate the headlamps in high beam mode and found that the circuit breaker may open after 40 minutes of continuous operation. We concluded that operating the headlamps in high beam mode for extended periods of time would be unusual operation conditions, so we did not anticipate for this issue to happen in normal use, where high beams are used only for short periods of time. Based on this finding, it was determined no unreasonable risk to motor vehicle safety existed. Since we believed this issue was unrelated to safety, we decided to implement a running change in production, retrofitting existing units in our lot, and issue a vehicle owner notification (VON) to update vehicles delivered to customers to the higher amperage circuit breaker as a product quality improvement.

In December 2012, field input and test results indicated it is possible for a circuit breaker to trip sooner than we anticipated originally. At that time, we decided that there was sufficient evidence to escalate the issue through our safety process. On January 16th, DTNA decided to voluntarily recall the affected vehicles.

A Daimler Company

Daimler Trucks North America LLC  
4747 N. Channel Avenue  
Portland OR 97217-7699  
503-745-6910 Phone  
503-745-5544 Fax  
Nasser.Zamani@Daimler.com

Based on the information above, we believe we have done due diligence by taking action in a timely manner and in accordance with the Safety Act. To reiterate, the production and field improvements were completely independent and separate from any safety defect consideration which began late December based on new information. We submitted a Defect Information Report to NHTSA within five working days after a DTNA safety decisions.

We respectfully request updating the Acknowledgement Letter accordingly.

Please contact me if you have any questions.

Sincerely yours,

A handwritten signature in black ink that reads "Nasser Zamani". The signature is written in a cursive style with a large, sweeping initial 'N'.

Nasser Zamani