

# DAIMLER

Daimler Trucks North America

Nasser Zamani  
Senior Manager  
Compliance and Regulatory Affairs

December 16, 2013

Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attention: Recall Management Division (NVS-215, Rm. W45-206)  
1200 New Jersey Avenue S.E.  
Washington D.C. 20590

**RE: Defect Information Report – Supplemental Report No. 1  
13V-537, FL-650AB, IMMI Flip & Floor Mount Seat U-Bolts  
Representative Dealer Notice**

Ms. Lewis,

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Daimler Trucks North America LLC herewith submits supplemental defect information and copies of documents distributed to dealers.

- (c)(3) Total number of potentially affected School Bus: 328
- (c)(8)(ii) Dealer and distributor notification: Began and ended: December 13, 2013
- (c)(10) A copy of communications sent to dealers is attached.

Please contact me if you have any questions, or concerns.

Sincerely yours,



Nasser Zamani

Cc: Amy Martin, CAL-OSHA  
Attachment

A Daimler Company

Daimler Trucks North America LLC  
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Portland OR 97217-7699  
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December 2013  
FL650AB  
NHTSA # 13V-537

## Subject: IMMI FLIP & Floor Mount Seat U- Bolt

**Models Affected: Specific Thomas Built Buses Saf-T-Liner HDX and Saf-T-Liner EFX school buses manufactured October 17, 2011 through July 3, 2013.**

### General Information

Daimler Trucks North America LLC (DTNA), on behalf of its wholly owned subsidiary, Thomas Built Buses (TBB), has decided that a defect that relates to motor vehicle safety exists on the vehicles mentioned above.

There are approximately 328 vehicles involved in this campaign.

On certain buses, A U-bolt intended to reinforce certain seat installations to the chassis, may have been left out of the assembly process. Units with missing reinforcement components may not withstand high seat loads during a crash.

A U- bolt will be added to the affected IMMI seats.

### Additional Repairs

Dealers must complete all outstanding Recall and Field Service campaigns prior to the sale or delivery of a vehicle. A Dealer will be liable for any progressive damage that results from its failure to complete campaigns before sale or delivery of a vehicle.

Owners may be liable for any progressive damage that results from failure to complete campaigns within a reasonable time after receiving notification.

### Work Instructions

Please refer to the attached work instructions.

### Replacement Parts

Replacement parts are now available and can be obtained by ordering from your facing Parts Distribution Center.

If our records show your dealership has ordered any vehicles involved in campaign number FL650AB, a list of the customers and vehicle identification numbers will be available on AccessFreightliner.com. Please refer to this list when ordering parts for this recall.

**Table 1** – Replacement Parts for FL650AB

Campaign Number	Part Number	Description
FL650AB	TBB 59000137	U-Bolt Mounting Body to Chassis
	TBB 69004066	Washer, Flat, 7/16 ID
	TBB 29940038	Locknut 7/16-14 Prevailing

**Table 1**

### Removed Parts

Please follow Warranty Failed Parts Tracking shipping instructions for the disposition of all removed parts.

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## Labor Allowance

Table 2 – Labor Allowance

Campaign Number	Procedure	Time Allowed	SRT Code	Correction Code
FL650A (325 units involved)	(2) U-Bolt IMMI Seat Modification	.8	174-6070M	12 – Repair Recall/Campaign
FL650B (3 units involved)	(1) U-Bolts IMMI Seat Modification	.4	174-6070N	12 – Repair Recall/Campaign

Table 2

## Claims for Credit

You will be reimbursed for your parts, labor, and handling by submitting your claim through the Warranty system within 30 days of completing this campaign. Please reference the following information in QuickClaim or OWL:

- Claim Type is **Recall**
- Enter the campaign number and appropriate condition code (**FL650AB**).
- In the Primary Failed Part Number field, enter **TBB 175694**
- In the Parts field, enter the appropriate kit/part number(s) as shown in the Replacement Parts Table.
- In the Parts field, enter the appropriate kit/part number(s) as shown in the Replacement Parts Table.
- In the Labor field, first enter the appropriate SRT from the Labor Allowance Table.
- For OWL, the VMRS Component Code is **174-002-001** and the Cause Code is A1 - Campaign.
- **U.S. and Canada – Reimbursement for Prior Repairs.** When a customer asks about reimbursement, please do the following:
  - Accept the documentation of the previous repair.
  - Make a brief check of the customer's paperwork to see if the repair may be eligible for reimbursement. (See the "Copy of Owner Letter" section of this bulletin for reimbursement guidelines for this recall.)
  - Submit a Campaign Pre-Approval inquiry to the Warranty Campaigns Department for a decision and authorization number.
  - Include the approved amount on your claim in sublet/outside purchases.
  - In the claim story, first note the authorization number and that the claim includes a reimbursement request.\
  - Retain the documentation and provide it to Warranty Campaigns or Claims Processing if requested.
  - When your claim is paid, reimburse the customer the appropriate amount.

**IMPORTANT:** ServicePro or OWL must be viewed prior to performing the recall to ensure the vehicle is involved and the campaign has not been previously completed. Also, check for a completion sticker prior to beginning work.

# Recall Campaign

Daimler Trucks  
North America LLC

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U.S. and Canadian dealers, contact the Warranty Campaigns Department at (336) 889-4871, from 8:00 a.m. to 5:00 p.m. Eastern Time, Monday through Friday, via Web inquiry at [AccessFreightliner.com](http://AccessFreightliner.com) / My Tickets and Submit an Inquiry, if you have any questions or need additional information.

U.S. and Canadian Dealers: To return excess kit inventory related to this campaign, U.S. dealers must submit a Parts Authorization Return (PAR) to the Memphis PDC. Canadian dealers must submit a PAR to their facing PDC. All kits must be in resalable condition. PAR requests must include the original purchase invoice number.

The letter notifying U.S. and Canadian vehicle owners is included for your reference.

Please note that the National Traffic and Motor Vehicle Safety Act, as amended (Title 49, United States Code, Chapter 301), requires the owner's vehicle(s) be corrected within a reasonable time after parts are available to you. The Act states that failure to repair a vehicle within 60 days after tender for repair shall be prima facie evidence of an unreasonable time. However, circumstances of a particular situation may reduce the 60 day period. Failure to repair a vehicle within a reasonable time can result in either the obligation to (a) replace the vehicle with an identical or reasonably equivalent vehicle, without charge, or (b) refund the purchase price in full, less a reasonable allowance for depreciation. The Act further prohibits dealers from selling a vehicle unless all outstanding recalls are performed. Any lessor is required to send a copy of the recall notification to the lessee within 10 days. Any subsequent stage manufacturer is required to forward this notice to its distributors and retail outlets within five working days.

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## Copy of Notice to Owners

### Subject: IMMI FLIP & Floor Mount Seat U- Bolt

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. This notice is sent to you in accordance with the Canadian Motor Vehicle Safety Act.

Daimler Trucks North America LLC (DTNA), on behalf of its wholly owned subsidiary, Thomas Built Buses (TBB) has decided that a defect which relates to motor vehicle safety exists on specific Thomas Built Buses.

On certain buses, A U-bolt intended to reinforce certain seat installations to the chassis, may have been left out of the assembly process. Units with missing reinforcement components may increase the risk of injury to the vehicle occupants.

A U- bolt will be added to the affected IMMI seats.

**To arrange for repairs, you should contact your local Thomas Built Bus dealer immediately.** Thomas will remedy this defect without charge. The repair should take approximately .4 hours up to .8 hours depending on your vehicle, and will be performed at no charge to you.

You may be liable for any progressive damage that results from your failure to complete the Recall within a reasonable time after receiving notification.

If you do not own the vehicle that corresponds to the identification number(s) which appears on the Recall Notification, please return the notification to the Warranty Department with any information you can furnish that will assist us in locating the present owner. If you have leased this vehicle, Federal law requires that you forward this notice to the lessee within 10 days.

If you have paid to have this recall condition corrected prior to this notice, you may be eligible to receive reimbursement. For further information, please contact the Warranty Department at (336) 889-4871, 8 a.m. to 5 p.m. Eastern Time Monday through Friday. To find a dealer in your area please go to [www.thomasbus.com](http://www.thomasbus.com).

If you have any questions about this recall, please contact the Warranty Department at (336) 889-4871, 8:00 a.m. to 5:00 p.m. Eastern Time, Monday through Friday. If you are not able to have the defect remedied without charge and within a reasonable time, you may wish to submit a complaint to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, SE., Washington, DC 20590; or call the Vehicle Safety Hotline at (888) 327-4236 (TTY: 800-424-9153); or to <http://www.safercar.gov>. In Canada, you may contact Transport Canada-road safety, 80 rue Noel, Gatineau, Quebec J8Z 0A1 or call 1-800-333-0510.

We regret any inconvenience this action may cause but feel certain you understand our interest in motor vehicle safety.

THOMAS BUILT BUSES WARRANTY DEPARTMENT  
Enclosure

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## Work Instructions

**Subject: Missing U-Bolt for IMMI seat mounting**

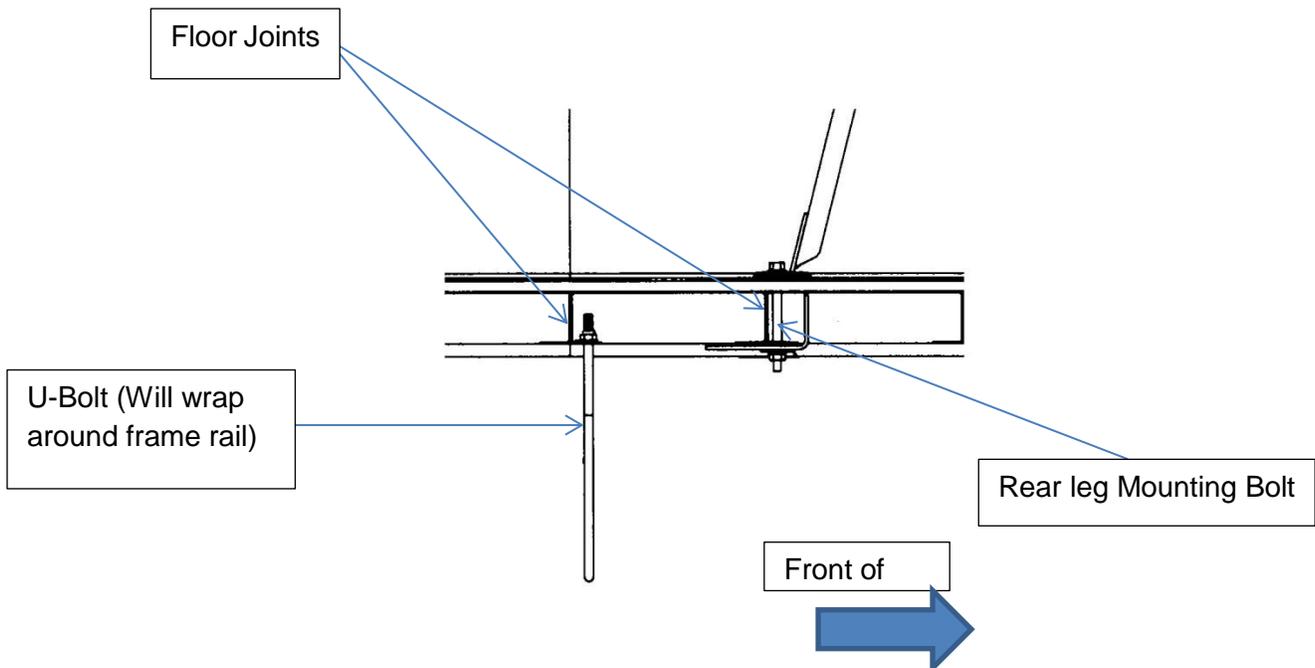
**Models Affected: Specific Thomas Built Buses Saf-T-Liner HDX, MVP-EF/EFX school buses manufactured October 17, 2011, through July 3, 2013.**

This document will provide general instructions for the addition of U-Bolt underneath floor behind IMMI four-legged floor mount seats and IMMI flip seats near side door entrance.

**Problem: IMMI seats may require extra strength via a U-bolt mounted underneath floor to meet FMVSS seating requirements.**

### Repair Procedure:

- 1) Chock wheels, set parking brake, place the bus in Park or Neutral and make sure the key is in the OFF position.
- 2) Locate IMMI seat (either flip seat or four legged) and note the location of the back feet of the seat.
- 3) Under bus, locate where the back legs are mounted. They will be mounted where two floor sheet pieces come together. Using this as a reference, go back one floor joint and this will be the joint you will mount U-Bolt. (See **Figure 1**)



**Figure 1**

- 4) On the inside of frame rail, there will be a hole to mount the U-Bolt to floor flange. Hold up the U-bolt under

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the frame rail, line up with one leg with the hole. With a magic marker, mark the location of where the outside leg falls on the floor flange. This is the location to drill hole to mount other side of U-bolt.

- 5) Drill 7/16" hole where you marked the spot on the flange.
- 6) Wrap U-bolt (TBB 59000137) around the frame rail and push threaded ends into the two holes. (When the U-bolt is tightened, make sure that it does not crush any hoses, pipes or wiring harnesses.)
- 7) Install one washer (TBB 69004066) on threaded part of U-bolt after installed in hole..
- 8) Install one nut (TBB 29940038) on each as well and tighten down by hand.
- 9) Using 11/16" socket, tighten the bolts down until they are tight, but DO NOT deform floor flange.
- 10) Repeat procedure for second U-Bolt if necessary

## Parts:

Part number	Description	Qty. Per seat
TBB 59000137	BOLT- U, MOUNTING BODY TO CHASSIS	1
TBB 69004066	WASHER, FLAT, .500 ID, 1.250 OD, STEEL, CLR ZINC	2
TBB 29940038	LOCKNUT 7/16-14 PREVAILING	2

## Tools:

- 7/16" Drill Bit
- Drill
- Black Sharpie
- 11/16" Socket