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Daimler Trucks North America
Nasser Zamani
Senior Manager
Compliance and Regulatory Affairs

October 28, 2013

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

Re: Defect Information Report FL-650, IMMI seats with U-bolts

Ms. Lewis,

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Daimler Trucks North America LLC herewith reports a safety campaign to recall approximately 325 Thomas Built Buses Saf-T-Liner HDX and Saf-T-Liner EFX School Bus vehicles manufactured October 17, 2011 through July 2, 2013, and equipped with certain seats potentially missing U-bolts which may cause the seat support to not perform to DTNA specifications in the event of a crash.

Attached is Daimler Trucks North America's Defect Information Report.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Amy Martin, Chief Counsel, CAL-OSHA
Enclosure
Certified Mail# 7003 2260 0001 3404 2235

A Daimler Company

Daimler Trucks North America LLC
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Defect Information Report

(Section 573.6)

October 28, 2013

(c)(1) Manufacturer: Daimler Trucks North America LLC
P.O. BOX 3849
Portland, Oregon 97208
(503) 745-5219

Brands: Thomas Built Buses

(c)(2) Vehicles identification:

Model(s) affected: Saf-T-Liner HDX and Saf-T-Liner EFX school buses

Model Years affected: 2012-2014

Manufacture Dates: October 17, 2011 through July 2, 2013

Basis for determining population: School buses built with IMMI flip seats and/or IMMI floor mount seats.

Component manufacturer if other than the vehicle manufacturer: N/A

(c)(3) Total number of vehicles potentially affected: Approximately 325 in the United States.

(c)(4) Percentage of vehicles estimated to contain the defect: Unknown

(c)(5) Description of the defect: 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.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: Underperforming seat reinforcements may increase the risk of injury in a crash.

(c)(6) Chronology of principal events: In July of 2013 Thomas Built Buses discovered discrepancy in U-bolt material supply for Saf-T-Liner HDX and Saf-T-Liner EFX school buses with certain seats and begin investigating for documentation accuracy. In August a visual inspection of units showed missing U-bolts from 2 installation. In September information was requested from IMMI for verification of U-bolt requirements with certain seats and based on verification from IMMI, TBB determined U-bolts are required to meet DTNA standards. Vehicles were put on hold at the factory. In October DTNA decided to conduct a voluntary recall on affected population with no complaints reported.

(c)(7) Noncompliance-test or other data:

(i) Remedial program: Potentially affected vehicles will be inspected and missing U-bolts will be installed as required. Repairs will be performed by Daimler Trucks North America authorized service facilities.

Reimbursement Plan: Copies will be submitted as a supplemental report when available.

(ii) Estimated Owner and Dealer Notification Date: Customer notification will be by first class mail using Daimler Trucks North America records to determine the customers affected. This will be completed no later than December 28, 2013.

Dealer and distributor notification will be completed no later than December 28, 2013.

(c)(9) Information for tire recalls: Not Applicable

(c)(10) Communications sent to manufacturers, dealers and owners: Copies will be submitted as a supplemental report when available.

(c)(11) Manufacturer's campaign number: FL-650