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13V-539

2 Pages

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

October 29, 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-651, Saf-T-Liner C2 School Bus Seat Track Rivets

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 73 Thomas Built Buses Saf-T-Liner C2 School Bus vehicles manufactured July 9, 2013 through September 12, 2013, and equipped with track seating.

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# 7000-1670-0007-7315-0864

A Daimler Company

Daimler Trucks North America LLC
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Portland OR 97217-7699
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Defect Information Report

(Section 573.6)

October 29, 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 C2 School Bus

Model Years affected: 2014

Manufacture Dates: July 9, 2013 through September 12, 2013

Basis for determining population: All Saf-T-Liner C2 vehicles with track seating manufactured with a certain rivet from July 9, 2013 through September 12, 2013.

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

(c)(3) **Total number of vehicles potentially affected:** Approximately 73

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

(c)(5) **Description of the defect:** Certain seats with seatbelts are attached to a seat track that is mounted to the floor. The rivets used to attach the seat track to the floor may not have been properly seated when installed. If the rivets are not properly seated, the seat belt anchorages may not meet the DTNA requirements.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: In the event of a crash, if the seat track rivets were not properly seated, the seat belt anchorages may not perform as expected increasing the risk of injury.

(c)(6) **Chronology of principal events:** In early July of 2013, Thomas built buses began using a rivet with a longer grip range but with the same mechanical properties as the previous rivet, when installing the seat tracks. In early September 2013 a DTNA test found that the new rivet may not perform as expected. DTNA began an investigation and determined that the rivet may not achieve the designed grip strength due to material stack up and the compression of the joint before the rivet is pulled. On October 29 DTNA decided to conduct a voluntary safety recall of certain Thomas Built Buses manufactured July 9, 2013 through September 12, 2013.

(c)(7) **Noncompliance-test or other data:** N/A

(c)(8) (i) The seat track mounting will be reinforced as needed. 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-651