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By Recall Management division at 9:54 am, Dec 16, 2013

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

December 13, 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-657, Eaton Hybrid Transmission Software School Bus**

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 29 Thomas Built Buses Saf-T-Liner C2 school bus vehicles manufactured December 3, 2009 through February 8, 2012, and equipped with Eaton Hybrid Transmission software with a defect in shift logic.

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#

A Daimler Company

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## Defect Information Report (Section 573.6)

December 13, 2013

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

**Brands:** Thomas Built Buses

**(c)(2) Vehicles identification:**

**Model(s) affected:** Saf-T-Liner C2 School Bus

**Model Years affected:** 2011, 2012, 2013

**Manufacture Dates:** December 3, 2009 through February 8, 2012

**Basis for determining population:** Eaton supplied a list of VINs that have the suspect software versions installed

**Component manufacturer if other than the vehicle manufacturer:**

Eaton Corporation  
1000 Eaton Blvd.  
Cleveland, OH 44122

**(c)(3) Total number of vehicles potentially affected:** 29

**(c)(4) Percentage of vehicles estimated to contain the defect:** Eaton reports 100%

**(c)(5) Description of the defect:** Eaton has notified DTNA that it has recalled certain hybrid transmission software versions. Eaton reports that *"The defect is caused by the shift logic of Hybrid Control Module software versions 5500682 and 5500683. During a downshift, the logic will synchronize engine speed with the speed of the next lower gear, even where the current gear is engaged. This can result in unintended acceleration during a downshift."* Reference Eaton Hybrid Transmission software recall reported to NHTSA on December 11, 2013.

**49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety:** Eaton reported that *"This defect can cause a vehicle crash without prior warning."*

**(c)(6) Chronology of principal events:** On December 6, 2013 Eaton notified DTNA of a safety issue related to certain hybrid transmission software installed on some DTNA vehicles. DTNA worked with Eaton to understand the scope of the issue and identify which vehicles were affected. On December 13, 2013 DTNA decided to conduct a voluntary safety recall of certain Freightliner and Freightliner Custom Chassis Corporation vehicles. DTNA has decided to include all DTNA vehicles with the suspect Eaton software installed in this recall regardless of whether the software was installed as an OEM installation or if it was installed by Eaton as a field service modification.

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

**(i) Remedial program:** The hybrid transmission software will be updated with a new version. Repairs will be performed by Eaton 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 February 12, 2014.

Dealer and distributor notification will be completed no later than February 12, 2014.

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

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**(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-657