

DAIMLER

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

December 20, 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-539, FL-651, TBB Saf-T-Liner C2 Seat Track Rivets
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 a representative copy of the document distributed to owners.

(c)(8)(ii) Dealer and distributor notification: Began and Ended: December 19, 2013.

(c)(10) A copy of communications sent to owners is attached.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Amy Martin, CAL-OSHA
Attachment

Recall Campaign

Daimler Trucks
North America LLC

December 2013
FL651A-G
NHTSA # 13V-539
Transport Canada # 13-379

Subject: TBB Saf-T- Liner C2 Seat Track Rivets

Models Affected: Specific Thomas Built Buses Saf-T-Liner C2 school buses manufactured July 9, 2013, through September 12, 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 74 vehicles involved in this campaign.

On certain buses, 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, in the event of a crash, the seat belt anchorages may not perform as expected increasing the risk of injury.

The seat track mounting will be reinforced as needed.

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 FL651A-G, 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 FL651A-G

Campaign Number	Part Number	Description
FL651A-G	TBB 69004114	Washer, Flat – 5/16 I.D. x 1 ½ O.D.
	TBB 69004121	Nut, Flange 5/16-18, Serrated
	TBB 125077	Floor Reinforcement, Channel. Seat (Only needed where bolt falls on z-channel)
	TBB 174029	5/16"-18x3.50, Flat Head SOC CAP, Screw (only needed where bolt falls z-channel)
	TBB 174027	5/16"-18x1.25, Flat Head SOC CAP, Screw
	TBB 182294	Rivet, Huck Magna Bulb, 5/16" Countersunk, -15

Table 1

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Removed Parts

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

Labor Allowance

Table 2 – Labor Allowance Procedure 1

Campaign Number	Procedure	Time Allowed	SRT Code	Correction Code
FL651A (17 Units Involved)	Add Extra Bolt Every 12" To Track – Full Bus	32	174-6795A	12 – Repair Recall/Campaign
FL651B (4 Units Involved)	Add Extra Bolt Every 12" To Track – 1/2 Bus	16	174-6795B	12 – Repair Recall/Campaign
FL651C (9 Units Involved)	Add Extra Bolt Every 12" To Track – 1/4 Bus	8	174-6795C	12 – Repair Recall/Campaign

Table 2

Table 3 – Labor Allowance Procedure 2

Campaign Number	Procedure	Time Allowed	SRT Code	Correction Code
FL651D (29 Units Involved)	Add Extra Rivet Every 12" To Track – Full Bus	18	174-6795D	12 – Repair Recall/Campaign
FL651E (2 Units Involved)	Add Extra Rivet Every 12" To Track – 3/4 Bus	13	174-6795E	12 – Repair Recall/Campaign
FL651F (1 Unit Involved)	Add Extra Rivet Every 12" To Track – 1/2 Bus	9	174-6795F	12 – Repair Recall/Campaign
FL651G (12 Units Involved)	Add Extra Rivet Every 12" To Track – 1/4 Bus	4.5	174-6795G	12 – Repair Recall/Campaign

Table 3

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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 (**FL651A-G**).
- In the Primary Failed Part Number field, enter **TBB 173640**
- 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 **174-001-066** 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.

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 / 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

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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: TBB Saf-T-Liner C2 Seat Track Rivets

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, 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, in the event of a crash, the seat belt anchorages may not perform as expected increasing the risk of injury.

The seat track mounting will be reinforced as needed.

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 8 hours up to 32 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.

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: TBB Saf-T- Liner C2 Seat Track Rivets

Models Affected: Specific Thomas Built Buses Saf-T-Liner C2 school buses manufactured July 9, 2013, through September 12, 2013.

Repair procedure 1, applies for population groups A, B, C:

- 1) Chock wheels, set parking brake, make sure shifter is in Park or Neutral, and the ignition switch is off.
- 2) After reviewing the layout of the track, mark off with tape the first location near end of track as in Figure 1. Next mark off 12" from that location to the next on same piece of track. Continue marking off every 12" until end of that section and for each of the remaining sections.
- 3) Drill using a "P" bit (.3230" bit), drill hole centered on track at each of the markings provided in step2. (This may require removing seats if drill will not fit.) This hole will be thru the track and floor. See Figure 1.

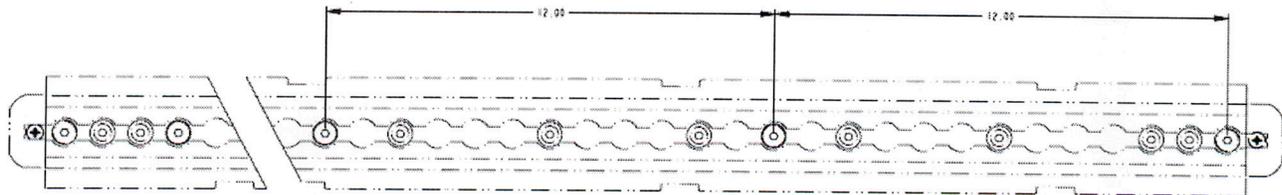


Figure 1

- 4) Using countersink tool (TBB 185046), create a countersink in each of the holes that were previously drilled. This should be an 82 degree countersink at a .191" depth.
- 5) Insert 5/16"-18 X 1.25 flat head socket cap bolt (TBB 174027) in each hole.
- 6) Underneath bus, install a washer (TBB 69004114) and nut (TBB 69004121) on each of the bolts that were inserted thru track and floor.
- 7) If Z-section interferes with the washer and nut being tightened up against floor, use bracket (TBB125077) over the Z-section as shown in Figure 2 along with longer bolt (TBB 174029).
- 8) Tighten each nut down until secure against floor and bolt is flush against top of track.
- 9) Re-verify that all bolts are installed and tightened down.
- 10) Spray on undercoating anywhere it was removed from installing bolts.
- 11) Un-chock wheels.

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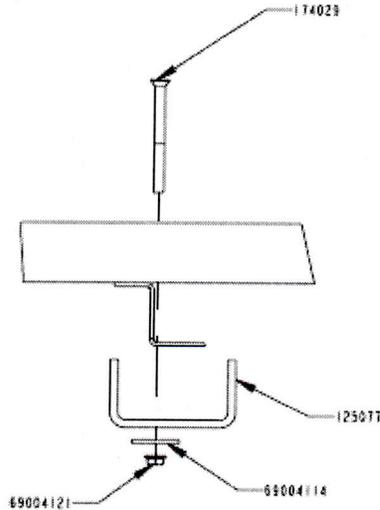


Figure 2

Tools needed

P sized drill bit
Countersink Kit (TBB 185406)
Includes:

- TBB 185046 Countersink Fixture for bolted track.
- TBB 185260 3/4" E-Clip fits .580" Groove
- TBB 185261 LINK 5/16" Counter Drill Ring Seat

5/16" Socket wrench
3/16" X 50mm point

Parts list

TBB 69004114	Washer, Flat - 5/16 I.D. X 1 1/2 O.D.
TBB 69004121	Nut, Flange 5/16-18, Serrated
TBB125077	Floor Reinforcement, Channel, Seat (Only needed where bolt falls on z-channel)
TBB 174029	5/16"-18 X 3.50, Flat Head SOC CAP, Screw (Only needed where bolt falls on z-channel)
TBB 174027	5/16"-18 X 1.25, Flat Head SOC CAP, Screw

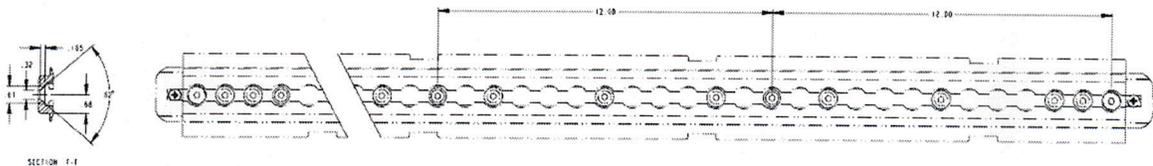
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Repair procedure 2, applies for Population groups D, E, F, G:

- 1) Chock wheels, set parking brake, make sure shifter is in Park or Neutral, and the ignition switch is off.
- 2) After reviewing the layout of the track, mark off with measuring tape the first location near end of track as in Figure 1. Next mark off 12" from that location to the next on same piece of track. Continue marking off every 12" until end of that section and for each of the remaining sections.
- 3) Using a drill with a "P" bit (.3230" bit) drill hole centered on track at each of the markings provided in steps 2 and 3. (This may require removing seats if drill will not fit.) This hole will be thru the track and floor. See Figure 1.



INSTALL PROCEDURE:

- 1) ADDITIONAL #15 RIVETS (182294) ARE TO BE PLACED IN 12" INCREMENTS.
- 2) USE "P" BIT (\varnothing .3230") TO DRILL HOLE THRU TRACK AND FLOOR AT APPROPRIATE RIVET LOCATION.
- 3) ADD 82° COUNTERSINK AT .165" DEPTH.
- 4) INSTALL RIVET WHERE AN ACCEPTIBLE BULB IS POSSIBLE WITH TWO THREADS VISABLE AND WITHOUT INTERFERENCE. INSTALL BOLT (174029) WITH BRACKET (125077), NUT (69004121) AND WASHER (69004114) AT ANY LOCATION WITH A Z-RAIL OR OTHER INTERFERENCE THAT DOES NOT ALLOW A RIVET WITH AN ACCEPTIBLE BULB AND AT LEAST TWO VISABLE THREADS (REFER TO VIEW A, SHEET 1).

Figure 1

- 4) Using countersink tool (TBB185642), create a countersink in each of the holes that were previously drilled. This should be an 82 degree countersink at a .191" depth.
- 5) Insert #15 Rivet (TBB 182294) into each hole drilled and using appropriate rivet gun install rivet.
- 6) Make sure that the rivet is seated properly as shown in **Figure 2**. If it does not seat properly, drill out and reinstall.
- 7) If Z-section interferes with installing rivet, use bracket (TBB125077) over the Z-section as shown in Figure 3, along with bolt (TBB 174029), washer (TBB 69004114) and Flange Nut, (TBB69004121).

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RIVET INSTALLATION QUALITY

SEE NOTE 7 PAGE 1

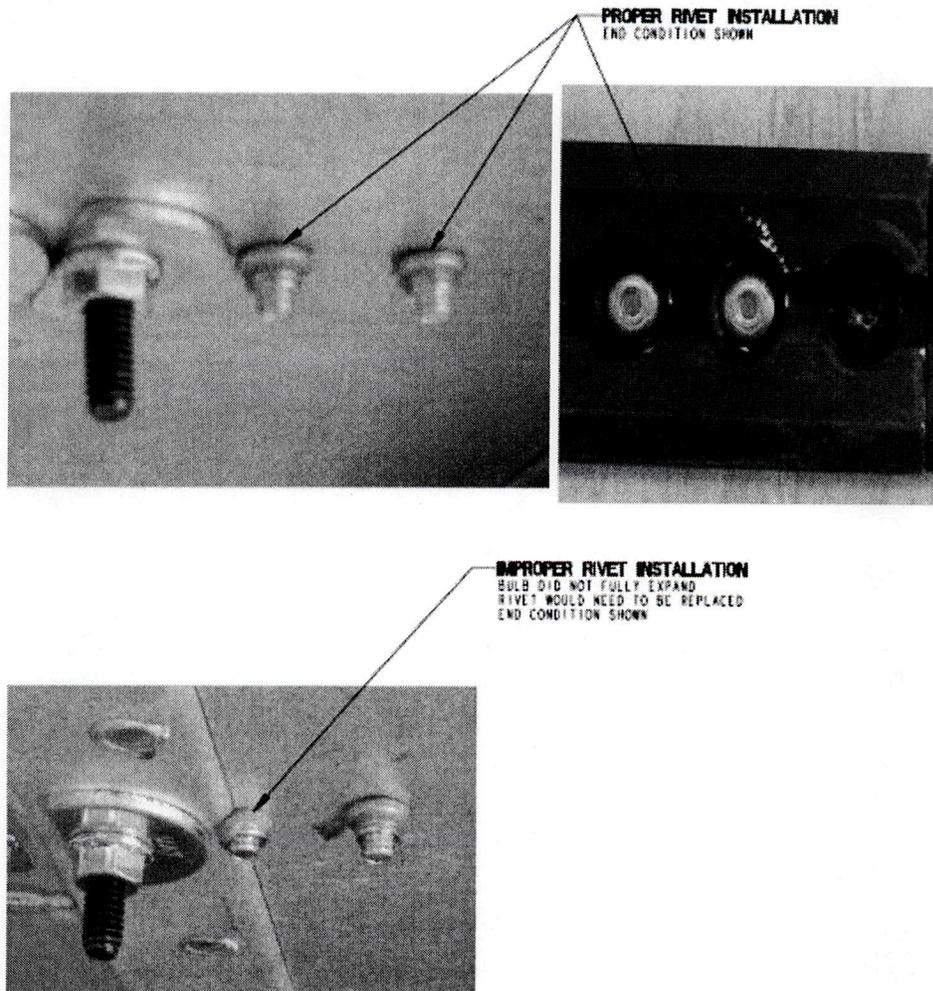


Figure 2

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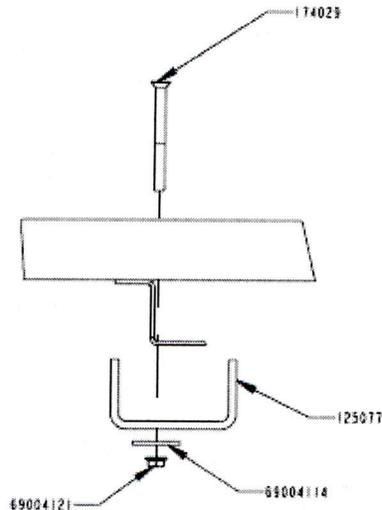


Figure 3

- 8) Tighten flange nut (TBB 69004121) down until secure against floor and bolt is flush against top of track.
- 9) Re-verify that all bolts are installed and tightened down.
- 10) Spray on undercoating anywhere it was removed from installing bolts.
- 11) Un-chock wheels.

Tools needed

P sized drill bit
Countersink Kit (TBB 185642)
5/16" Socket wrench
3/16" X 50mm point

Parts list

TBB 69004114	Washer, Flat - 5/16 I.D. X 1 1/2 O.D.
TBB 69004121	Nut, Flange 5/16-18, Serrated
TBB125077	Floor Reinforcement, Channel, Seat (Only needed where bolt falls on z-channel)
TBB 174029	5/16"-18 X 3.50, Flat Head SOC CAP, Screw (Only needed where bolt falls on z-channel)
TBB 182294	Rivet, Huck Magna Bulb, 5/16" Countersunk, -15