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3 Pages)

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

March 10, 2011

Dan Smith  
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-592, M2 Headlamp Height**

Mr. Smith

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 301 Freightliner M2 vehicles manufactured July 19, 2010 through January 14, 2011, and equipped with headlamps that may be greater than 54" from the road surface.

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

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Michael Mason, CAL-OSHA  
Enclosure  
Certified Mail# 7006 3450 0000 3866 8055

A Daimler Company

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## Defect Information Report

(Section 573.6)

March 10, 2011

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

**Brands:** Freightliner

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

**Model(s) affected:** Business Class M2 106V

**Model Years affected:** 2011

**Manufacture Dates:** July 19, 2010 through January 14, 2011

**Basis for determining population:** EPA 10 M2 106V chassis cabs with certain suspension and tire combinations built July 19, 2010 through January 14, 2011.

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

**(c)(3) Total number of vehicles potentially affected:** Estimated at 301

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

**(c)(5) Description of the defect:** Business Class M2 106V incomplete chassis cab vehicles may have headlights which measure greater than 54" from the road surface. Federal Motor Vehicle Safety Standard 49CFR571.108(§5.3) requires headlights to be not less than 22 inches, nor more than 54 inches above road surface.

**49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety:** Improper height of headlights may not fully illuminate road surface or may inhibit the ability of motorists to see vehicles. This can increase the risk of traffic accidents.

**(c)(6) Chronology of principal events:**

**(c)(7) Noncompliance-test or other data:** At the end of June 2010, a DTNA manufacturing plant noted that some incomplete chassis cabs had headlamps measuring approximately 0.5" above 54". On July 16<sup>th</sup>, 2010, DTNA initiated recall FL-583 to address the incomplete chassis cabs and put in place procedures to identify and hold affected incomplete chassis cabs. The procedure included calculating the height of the headlamps on various chassis cab configurations to identify any that may be above 54". Chassis cabs identified as such were to be held from release to end customers. Chassis cabs measuring at or below 54" after the installation of body equipment were to be released. In March 2011, DTNA determined that the procedures put in place July 2010 were not fully effective in ensuring that no chassis cabs had non-compliant headlamps after completion with body equipment installation.

**(c)(8) (i) Remedial program:** Vehicle headlamp height will be inspected. Any vehicles with headlamps above 54" will receive new headlamps that lower the bulb center to be at or below 54". 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 approximately May 25, 2011.

Dealer and distributor notification will be completed approximately May 25, 2011.

**(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-592