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14V-075
(2 pages)

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

February 20, 2014

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-659, Minotour Floor Reinforcements

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 three Thomas Built Buses Minotour Dual Rear Wheel buses equipped with certain IMMI or S3C 3-passeger seats and manufactured between October 21, 2011, and January 16, 2014, without rear floor reinforcement channels.

Thomas Buses' investigation into this matter is ongoing, and the population of affected vehicles may expand based on the findings of this investigation.

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

A Daimler Company

Daimler Trucks North America LLC
4747 N. Channel Avenue
Portland OR 97217-7699
503-745-6910 Phone
503-745-5544 Fax
Nasser.Zamani@Daimler.com

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Defect Information Report (Section 573.6)

February 20, 2014

(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: Minotour Dual Rear Wheel (DRW) Buses

Model Years affected: 2013, 2014, and 2015

Manufacture Dates: October 21, 2011, through January 16, 2014

Basis for determining population: Minotour DRW +10 style units equipped with certain 3-passenger IMMI or S3C brand seats installed in the rear section of the bus

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

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

(c)(5) Description of the defect: On affected vehicles floor reinforcement channels designed to provide additional support to the seat belt anchorage system were inadvertently omitted during the manufacturing process.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: Omitted floor reinforcement channels may decrease the effectiveness of the seat belt system, and increase the risk of injury during a crash.

(c)(6) Chronology of principal events:

January 14, 2014, a review of inventory turn rates identified a lack of movement for specific floor reinforcement channels.

January – February 2014, an investigation was conducted to determine where the parts were intended to be used and the projected usage level. When it was confirmed that the reinforcement channels were intended for installation on certain Minotour DRW buses with 10 inch extended rear sections, engineering was notified and requested to determine the purpose of the parts and the potential effects.

February 2014, engineering confirmed that the reinforcement channels were added to specific vehicles for conformance to the October 2011 changes to FMVSS 571.210.

February 14, 2014, Daimler Trucks North America decided to conduct a voluntary safety campaign to retrofit the subject vehicles with reinforcement channels.

(c)(8) (i) Remedial program: Reinforcement channels will be added to the rear floor sections of the subject vehicles. 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 April 20, 2014

Dealer and distributor notification will be completed approximately April 20, 2014

(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-659