

DAIMLER

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

May 24, 2011

Christina Morgan, Chief
Early Warning Division, Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington D.C. 20590

Re: Sterling Foreign Recall – Simard Steering Arm

Ms. Morgan

This letter is submitted pursuant to the requirements of 49 CFR § 579.11(a), and is to advise NHTSA of a manufacturer initiated Safety Recall to be performed in a foreign country on certain Sterling Incomplete Vehicles that were modified by Simard Suspensions Inc. before delivery to the end user in Australia. On affected vehicles the steering double knuckle arm may not have been manufactured to the correct material specifications and could fracture under normal loads. DTNA is not aware of any vehicles modified by Simard Suspensions Inc. for sale in the United States with steering double knuckle arms manufactured with incorrect material specifications.

1. Manufacturer's name and address

Incomplete Vehicle Manufacturer:
Daimler Trucks North America
4747 N Channel Avenue
Portland OR 97217

Intermediate Manufacturer:
Simard Suspensions Inc.
1064 Boul.Mgr-De Lavel
Baie-aint-Paul (Quebec)
Canada G3Z2W9

Note: Affected vehicles were manufactured as Incomplete Vehicles by DTNA with a single front steer axles and converted to a twin front steer axle configuration by Simard Suspensions prior to delivery to the end user.

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

2. Identification of the date of determination by the manufacturer or the order by a foreign government to conduct a safety recall of other campaign in each foreign country

May 18, 2011

3. Identification of the vehicles potentially containing the defect or noncompliance, including a description of the manufacturer's basis for its determination of the recall population and a description of how the vehicles to be recalled differ from similar vehicles that are not included in the recall

Sterling HX LT7500 vehicles manufactured June 9, 2006, through April 30, 2009, and modified by Simard Suspensions Inc.

4. If a different manufacturer from the one reporting manufactured the component that contains the defect or noncompliance, the report shall identify the component and the component manufacturer by name, address and phone number

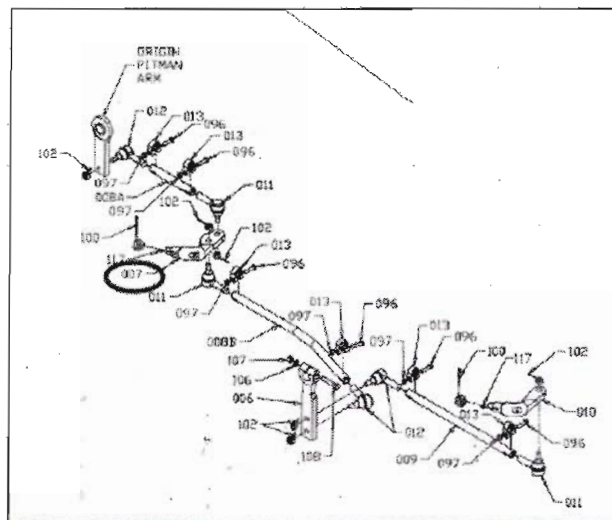
Simard Suspensions Inc.
1064 Boul.Mgr-De Lavel
Baie-aint-Paul (Quebec)
Canada G3Z2W9 – PH (418) 435 - 3346

5. The total number of vehicles potentially containing the defect or noncompliance

175

6. A description of the defect or noncompliance, including a description of the nature and physical location (if applicable) of the defect or noncompliance (49 CFR § 573.6(c)(5))

Certain Simard axles may have been equipped with a cast double steering knuckle arm (item 007) instead of the required forged steering arm.



7. Identification of each foreign country in which the recall or safety campaign is being conducted

Australia

8. A statement whether the foreign action is a safety recall or other safety campaign

This is a "Safety Recall".

9. A statement whether the determination to conduct the recall or campaign was made by the manufacturer or was ordered by a foreign government. If a foreign government made the determination, the report must contain a copy of the determination in the original language. If the determination is written in a language other than English, the report must also contain a translated copy

The determination to conduct this safety recall was made by the manufacturer.

10. A description of the manufacturer's program for remedying the defect or noncompliance

The steering arm knuckle on potentially affected vehicles will be inspected to determine if the part is cast or forged. Cast parts will be replaced with forged parts.

11. Identification of the date the action commenced or will commence in each foreign country

This Voluntary Safety Recall will commence in June 2011.

12. Identification of all motor vehicles subject to the action that are identical or substantially similar to that sold or offered for sale in the United States

Vehicles in Australia affected by this action are substantially similar to incomplete Sterling L-Line vehicles offered for sale in the United States with the exception of the steer axles installed by Simard. Suspensions Inc. DTNA is not aware of any vehicles modified by Simard Suspensions Inc. for sale in the United States with steering double knuckle arms manufactured with incorrect material specifications.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Via email – freccall@nhtsa.dot.gov