

FREIGHTLINER
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A DaimlerChrysler Company

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NVS-210

Timothy Blubaugh
Director
Government Technical Affairs

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OFFICE OF DEFECT
INVESTIGATION

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3-11-04

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PE04-012

Mr. Boyd,

The following is the information requested in your February 4, 2004 inquiry to Thomas Built Buses, Inc. regarding the Subject Vehicles: all 1999-2002 Thomas Built Buses EF Transit School Buses and Subject component: Headlight Switch.

1. State by model and model year the total number of subject vehicles equipped with the subject headlight switch, which Thomas has sold in the United States.

Answer: 1999- 1575 model MVP-EF
2000- 1328 model MVP-EF
2001- 1784 model MVP-EF
2002- 1539 model MVP-EF

2. State the number and provide copies of all the following, from all sources, of which Thomas is aware and which relate, or could relate to the alleged defect in the subject vehicle:

- a) Owner/fleet complaints
- b) Field reports
- c) Crash/incident reports
- d) Fire/incident claims
- e) Subrogation claims
- f) Lawsuits
- g) Third-party arbitrations proceedings (where Thomas is a party to the arbitration)

Please list and collate your response for each category ("a" through "g") by date of claim. Please provide for each item in this response the VIN, the incident data, mileage of the vehicle at the time of incident (if known), build date of vehicle, description of claim. And, and where a fleet vehicle is involved, the name of the fleet, and the name and telephone number of a contact person at that fleet. For items "a" through "d" please provide all related information and reports whether or not Thomas has verified each one. For items "e" through "g" summaries are acceptable. Please identify in the summary the caption, court, docket number, and filing date of each lawsuit if a copy of the complaint initiating the lawsuit is not provided.

- Answer: a) There are five(5) recorded customer complaints made by telephone to Thomas Customer Support. These Complaints are recorded on Field Service Report forms, which are attached. Each claim contains a contact and telephone number.
- b) Thomas is not aware of any Field Reports.

- c) Thomas is not aware of any crash/incident reports relating to the alleged defect.
 - d) Thomas is not aware of fire/incident claims relating to the alleged defect.
 - e) Thomas is not aware of any subrogation claims relating to the alleged defect.
 - f) Thomas is not aware of any lawsuits relating to the alleged defect.
 - g) Thomas is not aware of any third-party arbitrations relating to the alleged defect.
3. If Thomas has issued any service bulletins, advisories, or other communications to dealers, zone offices, or field offices pertaining to the alleged defect in the subject vehicles, provide a copy of each such document. If no such documents have been issued, so state.

ANSWER: Thomas issued recall 00V174. This recall was issued because with a certain marker light option, the headlight switch was overloaded. A copy of the recall is attached.

4. State the number of warranty claims, including extended warranty claims, and requests for "goodwill", field, or zone adjustments received by Thomas that relate to the alleged defect in the subject vehicles. Provide a table summarizing the claims, including the following information: model year, VIN, build date, claim date, and claim code. Each problem claim code must be identified.

ANSWER: Thomas has warranty claims for the subject headlight switch but only one of the claims mentions that the switch overheated, smoked and/or melted. That claim was for IT88T4B2421109387, built in 2001. The claim date was 9-27-2001. The claim states "found yellow wires overheated and discolored wires."

5. Identify and provide copies of all documents reflecting any study, survey, and investigation pertaining to the alleged defect that is known to Thomas. Include all pertinent documents, regardless of whether they are interim, draft, or final form.

ANSWER: Thomas conducted a study/investigation and reported it to ODI under NSA-12sby; FE00-008. A copy of the letter to ODI is attached. Thomas also received information from Cole Hersee, which is attached.

6. Identify and describe all significant modifications or changes made by or on behalf of Thomas in the manufacture or design of the subject light switch used in the subject vehicles that relate, or could relate to the alleged defect. Also include any changes to the subject light switch that occurred in model years 1998 and 2003 for similar model buses. Include any component assembly changes at any Thomas assembly plants that could relate to the alleged defect. Additionally, include any circuitry changes and changes to other components within the subject component circuitry that may relate to the alleged defect. The following information must be included for each such modification or change, if none exist, then so state.

- a) The date, or approximate date on which the modification or change was incorporated into production;
- b) A description of the modification or change;
- c) The reason for the modification or change;
- d) Thomas's opinion of the change or modification's effectiveness;
- e) The part number of the modified part;
- f) Whether the original unmodified component was withdrawn from sale, and if so, when; and;
- g) Whether the modified or changed components can be interchanged with earlier production components.

ANSWER: 6.1 Thomas made a change to the headlight circuitry as explained in the Thomas submission to ODI NAS-12sby/FE00-008. The connector to headlight switch was changed.

- a) September 1999
- b) Vendor obsoleted the connector being used by Thomas.
- c) Improve connector pin alignment.
- d) Improved the connection.
- e) 61201521 harness assembly
- f) No, its available as a service part.
- g) New harness is not interchangeable with old.

6.2 The marker light circuit was removed from the headlight switch and put on its own relay, removing the electrical load from the switch.

- a) July 13, 2000
- b) Marker light switch
- c) The electrical load from option B3640-03-000 overloaded the switch. Reference Thomas recall 00V174.
- d) Effectively reduced the load on the switch.
- e) A schematic P/N 52004601 is enclosed.
- f) Recall 00V174
- g) The relay was added to all Thomas MVP-EF models.

7. State the number of the subject headlight switches (for service repairs) that have been sold for use on the subject vehicles by component name, part number (both service and engineering), supplier (name and address) and model year of the vehicle(s) for which they were intended.

ANSWER: The Thomas engineering and service part number for the switch is the same, 61200880 and vendor number 71092-02. Thomas records show the following quantities sold: 1999-304; 2000-113; 2001-347; 2002-653

8. Please provide a list of buses by model year and model that use the switch which is the subject of this investigation and which are not included in the identified "Subject Population".

ANSWER: The switch, which is the subject of this investigation, has been used in Thomas MVP-EF models beginning in 1997 and is being used in current production.

9. Please provide a detailed electrical schematic of the headlight circuitry.

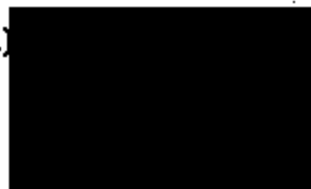
ANSWER: Detailed schematics 62202850 sheet 1 & 2, 62202861 daytime running light circuit and 52004601 marker light relay schematic are attached.

10. Provide a copy of all maintenance requirements published by Thomas and furnished to owners concerning the subject component.

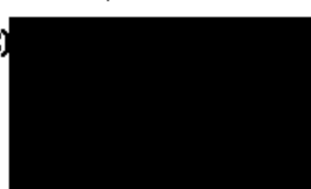
ANSWER: There are no maintenance requirements published by Thomas and furnished to customers concerning the subject headlight switch.

11. Provide a list of 12 fleets, operating 10 or more of the subject buses. Include a point of contact (name, address, telephone number) and model, model year of the subject buses owned.

ANSWER: 1)



2)



3)



4)



5) [REDACTED] KF
[REDACTED] HF
[REDACTED] 57
7) [REDACTED]
9) [REDACTED] 4
11) [REDACTED]

6) [REDACTED]
8) [REDACTED]
10) [REDACTED]
12) [REDACTED]

12. Furnish Thomas's detailed opinion of the alleged defect in the subject vehicles. Please include an assessment of the following:

- a) The causal or contributory factors which may result in the alleged defect;
- b) The failure mode;
- c) The risk to motor vehicle safety it poses;
- d) What warning(s), if any, would the operator of a subject vehicle have.

ANSWER: Thomas issued recall 00V174 for overloading the headlight switch. This recall covered 803 vehicles. Thomas has not been able to determine the cause(s) or extent of other headlight switch failures. The effect of this failure is the loss of headlights. Thomas Bus is continuing its investigation as to the root cause and extent of the problem before considering possible field action. The risk to motor vehicle safety will be assessed at the completion of the investigation, by the end of April.

If you have any questions please don't hesitate to contact me.

Sincerely,



Timothy Blubaugh