

FREIGHTLINER.
LLC

A DaimlerChrysler Company

Timothy A. Blubaugh
Director
Government Technical Affairs

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June 28, 2004

Mr. Richard Boyd, Chief
Medium and Heavy Duty Truck Division
Office of Defects Investigation - Safety Assurance
Office of Chief Counsel (NCC030)
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: NVS-214sgs / PE04-036

Dear Mr. Boyd:

This letter responds to the above referenced request for information about engine exhaust fumes entering the cab on certain Freightliner tractors. Per [REDACTED] additional warranty data will be sent in a few days.

Your specific requests are repeated verbatim in the following pages. Freightliner LLC's response follows each requests in bold.

If you have any questions, please contact me.

Sincerely yours,

Timothy Blubaugh by Bkg
Timothy Blubaugh

Cc: Ian Dawson

Attachments

OFFICE OF DEFECTS
INVESTIGATION
JUN 29 2 58 PM '04

RECEIVED
NVS-210

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Timothy Blubaugh
Director Government Technical Affairs
Freightliner LLC
4747 North Channel Avenue
Portland, OR 97217

NVS-214 sgn
PE04-036

Dear Mr. Blubaugh:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE04-036) to investigate allegations of diesel exhaust gas intrusion into the cab of Model Year (MY) 2003 and 2004 Freightliner Columbia vehicles manufactured by Freightliner LLC, and to request certain information.

This office has received five reports of diesel exhaust gas intrusion into the cab of four MY 2003 and 2004 Freightliner Columbia vehicles. A copy of each of the reports is enclosed for your information.

Unless otherwise stated in this text, the following definitions apply to these information requests:

- **Subject vehicles:** all MY 2003 and 2004 Freightliner Columbia vehicles manufactured for sale or lease in the United States.
- **Freightliner:** Freightliner LLC all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Freightliner (including all business units and persons previously referred to), who are or, in or after 2000, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect:** diesel exhaust gas intrusion into the cab.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, journals, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts,

administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Freightliner, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document, which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Freightliner or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Freightliner has previously provided a document to ODI, Freightliner may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Freightliner's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State, by model, model year and engine, the number of subject vehicles Freightliner has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Freightliner, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Engine;
 - f. Date of manufacture;
 - g. Date warranty coverage commenced; and
 - h. The state in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Confidentiality has been requested for Freightliner LLC Specific Production Data. A sample data sheet is provided in Attachment 1.0

2. State, by model, model year and engine, the number of each of the following, received by Freightliner, or of which Freightliner is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings where Freightliner is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Freightliner is or was a defendant or co-defendant.

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and Freightliner's assessment of the problem, with a summary of the significant underlying facts and evidence. For items e and f, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

a. - b. A survey of Freightliner Service Managers revealed five complaints for the subject vehicles. Four claims have come through the Freightliner legal department. A review of warranty mechanic problem descriptions also mentions driver complaints.

- c. There are no reported deaths, crashes. There are five reports of injuries in the form of nausea.
- d. There is no reported property damage.
- e. There are no Third-party arbitrations.
- f. There are no law suits.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. Freightliner's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model, model year, and engine;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether property damage is alleged;
 - k. Number of alleged injuries, if any;
 - l. Number of alleged fatalities, if any; and
 - m. Summary description of the complaints.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

This information is provided in an Excel Spread sheet titled "Request Number Two Data". A paper copy is provided in the Attachment 3.0.

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Freightliner used for organizing the documents.

Documentation is listed in Attachment 4.0 and identified by a "File Number".

5. State, by model, model year and engine, a total count for all of the following categories of claims, collectively, that have been paid by Freightliner to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Freightliner's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Freightliner Warranty is file by the year of the claim. There are files for each claim year for all Freightliner Models, 2000 through 2005, identified as "FTL Warranty Data- Claims for Year 2000", etc. Each file is sorted by vehicle "Year", "Model" and "Engine", respectively. Additional data still being processed and will be forwarded in a few days. See Attachment 5.0 for a sample data sheet.

6. Describe in detail the search criteria used by Freightliner to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Freightliner on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Freightliner offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty. Warranty searches were all made using root cause damage or claim codes for exhaust leaks, spills or breaks in general. These root causes comprise the first part of the mechanic's descriptions. There is no claim code for exhaust fumes in the cab. Each file was then filtered using key words to link exhaust fumes to a driver complaint or to passage into the vehicle. Key words and phrases used are: in, in the, into the truck, cab, sleeper, bunk; Fume, Fum, Fune, smell, smel, odor; The remaining entries were each confirmed or deleted by reading for applicability. An example is "Exhaust fumes": If it wasn't associated with a driver complaint or being inside the vehicle, it was eliminated.
7. State, by model, model year and engine, the number of all MY 2000 to current truck tractor vehicles, excluding subject vehicles, Freightliner has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Freightliner, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Engine;
 - f. Date of manufacture;
 - g. Date warranty coverage commenced; and
 - h. The state in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Confidentiality has been requested for Freightliner LLC Specific Production Data. A sample data sheet is provided in Attachment 1:0

8. State, by model, model year and engine, the number of each of the following, received by Freightliner, or of which Freightliner is otherwise aware, which relate to, or may relate to, the alleged defect in the vehicles included in Freightliner's response to Request No. 7:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings where Freightliner is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Freightliner is or was a defendant or codefendant.

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "e" through "f," provide a summary description of the alleged problem and causal and contributing factors and Freightliner's assessment of the problem, with a summary of the significant underlying facts and evidence. For items e and f, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

a. - b. There are no reports of complaints from Freightliner Service Managers for vehicles other than the subject vehicle. Four claims have come through the Freightliner legal department. A review of warranty mechanic problem descriptions also mentions driver complaints.

c. One of the complaints reports a driver death and another a driver injury (name(s)). There no reported crashes.

d. There is no reported property damage.

e. There are no Third-party arbitrations.

f. There are two lawsuits (part of "claims" above).

9. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 8, state the following information:
 - a. Freightliner's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 8 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether a fire is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

This information is provided in an Excel Spread sheet titled "Request Number Two Data". A paper copy is provided in the Attachment 3.0.

10. State, by model, model year and engine, a total count for all of the following categories of claims, collectively, that have been paid by Freightliner to date that relate to, or may relate to, the alleged defect in the vehicles included in Freightliner's response to Request No. 7: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Freightliner's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

In preparing Freightliner's response to this request, use the search criteria described in Freightliner's response to Request No. 6.

Warranty Data for all vehicles is provided in Attachment 5.0. Additional data still being processed and will be forwarded in a few days.

11. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Freightliner has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Freightliner is planning to issue within the next 120 days.

Freightliner has published no Service Bulletins or other advisories relating to the alleged defect on the subject vehicles. No publications are planned.

12. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Freightliner. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Within the past three months Freightliner conducted a cursory smoke test to simulate the passage of under hood exhaust fumes into the cab. A smoke generator was used to discharge smoke in the area of the exhaust manifold. The engine was running and the HVAC blower was on a "med" setting. It was observed that smoke escapes from under the hood through a variety of paths, including the fender wells and hood/cowl interfaces. With high volumes of smoke, some was ingested by the fresh air inlet, depending on prevailing winds and whether the engine-cooling fan cycled.

The Freightliner LLC Legal Department requested a air survey be done on a Columbia vehicle (K19326) for cab air quality because of driver complaints. The results indicate no presence of CO. CO2 levels were below OSHA permissible exposure limits, though the report does caution to consider NIOSH guidelines, which were exceeded. The report is located in Attachment 12

13. Describe all modifications or changes made by, or on behalf of, Freightliner in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part numbers (service and engineering) of the original component;
 - e. The part number (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Freightliner is aware of which may be incorporated into vehicle production within the next 120 days.

Freightliner introduced a new blend air HVAC system (A22-54706) for the subject vehicle on June 24, 2002, completely replacing the old water valve system (A22-42255). The new system has many performance advantages, however it is not believed to have any affect on the subject alleged defect. The systems are not interchangeable. The old part is available as a service component.

14. Produce one the following:
- a. Any kits that have been released, or developed, by Freightliner for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Freightliner does not have a service kit.

15. State the number of each of the following that Freightliner has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):
- a. Any kits that have been released, or developed, by Freightliner for use in service repairs to the subject component/assembly.

Freightliner does not have a service kit.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number) Also identify by make, model and model year, any other vehicles of which Freightliner is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

16. Furnish Freightliner's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses;
 - e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
 - f. The reports included with this inquiry.
- a. The change to EGR engines after Oct 2002 precipitated higher exhaust pressures and temperatures and more extensive piping needed for exhaust gas recirculation. As a result, there is a higher occurrence of exhaust leaks, particularly on some earlier engines.
 - b. On some engines the exhaust manifold slip joints, which accommodate expansion and contraction of the long manifold, may eventually wear from the higher heat and pressures, allowing exhaust fumes to escape. The hot pipe and EGR valve connections may leak due to installation error.
 - c. The leak sites can occur independently. Slip joints may leak due to accumulated mileage. The exhaust or EGR piping can sharply come loose from vibration or may not be properly installed. Minor exhaust leakage or oil fumes from the crankcase breather are generally not a problem and, to some extent, occur on all heavy-duty diesel engines in all trucks. However, a significant leak may cause an accumulation of exhaust fumes under the hood, which will escape through any opening, including wheel wells and cowl joints. If enough fumes are under the hood, they eventually may enter the cab through door leaks, windows or the fresh air intake. The ingress of exhaust fumes into the cab is believed to be a low speed or idle phenomenon.
 - d. There are no known negative health effects from exposure to low concentrations of diesel exhaust. Diesel exhaust does, however, produce an odor that most people find unpleasant.
 - e. Even low levels of diesel exhaust odor are readily apparent. The engine may run roughly or sound differently if the leak is extensive. Exhaust leaks can be identified during a routine under hood inspection by the soot deposits.
 - f. See analysis data provided for question 12.

This letter is being sent to Freightliner pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Freightliner's failure to respond promptly and fully to this letter could subject Freightliner to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30163(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond to ODI information requests.

If Freightliner cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Freightliner does not submit one or more requested documents or items of information in response to this information request, Freightliner must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Freightliner's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by June 28, 2004. Please refer to PE04-036 in Freightliner's response to this letter. If Freightliner finds that it is unable to provide all of the information requested within the time allotted, Freightliner must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Freightliner is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Freightliner then has available, even if an extension has been granted.

If Freightliner claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Freightliner must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (68 Fed. Reg. 44209 et seq; July 28, 2003), to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Freightliner is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Scott Shadle of my staff at (202) 366-2583.

Sincerely,

Richard Boyd, Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation

Enclosure 1, one CD ROM titled Data Collection Disc containing three files

Enclosure 2 - 5 Vehicle Owner Questionnaires (VOQ's)-10065987, 10060999, 10058310, 10047752, 10043867

NHTSA:NVS:ODI

NVS-214 [REDACTED] mEX62583:5/19/04

Cc:

NVS-200 Chron

NVS-214 Chron

Artemis Repository File-PE04-036

Document: [REDACTED] PE04-036-IR