

FREIGHTLINER
LLC

A DaimlerChrysler Company

Timothy
11/27/06

Timothy Blubaugh
Director
Government Technical Affairs

Freightliner LLC
4747 N. Channel Avenue
Portland, OR 97217-7699
PO Box 3849 C2D-ENG
Portland, OR 97208-3849
503.745.5219 Phone
503.745.6800 Fax
TimothyBlubaugh@Freightliner.com

November 3, 2006

Richard Boyd, Chief
Medium and Heavy Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: NVS-2 sjm/PE06-035

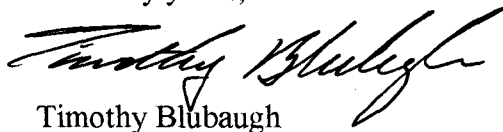
Mr. Boyd:

This letter responds to the above-referenced request for information about loose or missing electrical panel mounting screws on certain Thomas Built Minotour school buses.

Your specific requests, with identification codes, are repeated verbatim in the following pages. Freightliner LLC's response follows each request in **bold**.

If you have any questions, please contact me.

Sincerely yours,


Timothy Blubaugh

Attachments

Certified Mail# 70023150000414054349

North America's leading commercial vehicle manufacturer.

1. State, by model year, model and engine, the number of subject vehicles Freightliner has manufactured for sale or lease in the United States.

1. Answer: There have been approximately (2,800) 2006 Minotour buses manufactured on either a GMC or Ford chassis with the subject panel mounting. Every Minotour produced since the start of production in 1982 had an electrical panel mounted to the bus body with sheet metal screws. Engine type and chassis manufacturer does not affect the subject panel mounting.

2. State, by model year, model 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. Provide a copy of each such claim:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a fire, thermal event, short circuit, 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 "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.

2. Answer:

a) One consumer complaint was received by Thomas Bus dealer, American Bus Sales and Service, concerning a fleet of 2006 Thomas Minotour buses. The complaint, received in an e-mail, is attached (1.0-1.1).

b) Thomas Customer Support investigated the complaint listed in (a) and logged a report based on their findings, see Attachment 2.0-2.1.

- c) No reports involving a fire, thermal event, short circuit, crash, injury, or fatality have been received.**
- d) No property damage claims have been received.**
- e) No third party arbitrations have been conducted.**
- f) No lawsuits.**

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 fire is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any;
 - 1. Number of alleged fatalities, if any;
- m. Summary description of the complaints; and,
- n. Freightliner' opinion/assessment of the incidents. Provide a copy of the claim or repair order, any/all field reports and any documents related to or produced by Freightliner during their evaluation of this issue.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

3. Answer:

- a) E-mail from Howard Childress to the local Thomas dealer dated 9-5-2006**
- b) Consumer Complaint.**
- c) District of Columbia Public School, Division of Transportation, 1709 3rd Street, NE 2nd floor Washington, DC 20002. Phone 202-345-6111. Contact Howard Childress**
- d) No VIN's listed in the complaint from DCPS, however a complete list of the vehicles involved are provided an attachment to question number 4.**
- e) Thomas Minotour built on Ford cutaway chassis that have Ford engines. The model years are 2005 and 2006.**
- f) No mileage is listed on the spread sheet attached to question number 4.**
- g) The Thomas dealer was notified on 9-5-2006.**
- h) E mail dated 9-5-06, listed in (a)**

i) No fire alleged

j) No property damage alleged

k) No injuries alleged

l) No fatalities alleged

m) The complaint cited body electrical panels had missing or loose panel screws.

n) Thomas Bus dealer, American Bus Sales and Service, inspected the DCPS fleet of 200 Minotour buses and found 22 buses with loose or missing screws. These buses were all low mileage units delivered in September and October of 2005. The attached inspection spreadsheet was generated and lists missing or loose screws. The inspection validated the customer complaint that screws were loose or missing from the electrical panel. This was either a production problem or the screws were loosened after the buses left the factory. Thomas has inspected numerous other buses and has not found this to be a problem, see Attachment 3.0-3.3.

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.

4. Answer: Copies of the customer complaints, field report and the inspection spreadsheet are attached (1.0-1.1, 2.0-2.1 and 3.0-3.3).

5. State, by model year, model 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:

- a. Warranty claims;
- b. Extended warranty claims;
- c. Claims for good will services that were provided;
- d. Field, zone, or similar adjustments and reimbursements; and
- e. Warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

5. Answer:

2005 Minotour, Ford

- a) Two**
- b) None**
- c) Repaired under warranty**
- d) None**
- e) None**

2006 Minotour, Ford

- a) One**

- b) None**
- c) Repaired under warranty.**
- d) None**
- e) None**

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

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

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

Answer:

- a) 125027**
- b) DC Public Schools**
- c) 1FDXE45P56H [REDACTED] 4-21-06**
- d) 6,683 miles**
- e) Tony's Auto**
- f) Outside Labor**
- g) 0505**
- h) No. 10 x 5/8 truss head screw part number 69003099.**
- i) Crossing Arm not working**
- j) Copy attached (Attachments 4.0-4.3)**
- k) Screw missing from electrical panel**

- a) 101223**
- b) Dealer pre delivery inspection**
- c) 1FDWE35PX6H [REDACTED]**
- d) 1,693 miles**

- e) Trucks of Bismark, INC. Phone 701-223-5235
- f) WPM
- g) 0445
- h) No. 10 x 5/8 truss head screw part number 69003099
- i) Panel Loose
- j) Copy attached (Attachments 4.4-4.7).
- k) Screw missing from panel

- a) 101892
- b) Dealer pre delivery inspection
- c) 1GDJG31U061 [REDACTED]
- d) 504 miles
- e) Transportation South, Inc.
- f) WPM
- g) 0421
- h) Panel loose
- i) Copy attached (Attachments 4.8-4.11)
- j) Missing weld nut on panel.

6. Describe in detail the search criteria used by Freightliner to identify the claims identified in response to Request No. 2 and 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.

6. Answer: Thomas service reports and warranty claim records were searched by entering failure codes and the words "Minotour loose panel". The codes used in the search are listed in the answers for 5(g) above. The bus body electrical system is warranted for 1 year, unlimited miles. There was no extended warranty shown for the subject vehicles.

7. Describe how Freightliner first became aware of the alleged defect and state the date on which Freightliner first became aware of the possibility of the alleged defect. Provide a detailed chronology of all known thermal events regarding the alleged defect, starting from the time Freightliner first became aware of this issue to present. Include all information and provide and

provide a copy of any document used at any internal/external meeting(s), meetings with the part supplier, or other manufacturers.

7. Answer: Thomas Bus dealer American Bus Sales and Service was contacted on 9-1-06 and told that the DCPS fleet of Minotour's had several loose electrical panels. Thomas Customer Support was notified on 9-5-2006. The Thomas dealer inspected the buses on 9-5-06 and found loose panels. Thomas is not aware of any thermal events and the dealer confirmed there were no thermal events. See Attachment 1.0-1.1 for the initial contact information.

8. Produce copies of any/all service bulletins, 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.

8. Answer: There have been no service bulletins, warranty or other documents that relate to the alleged defect that have been issued including bulletins, advisories, informational documents, or other documents or communications. Thomas Bus issued Quality Alert 93-1 to the plant 10/27/06, see attachment 7.0.

9. For each such document provide in responding to question 8, provide a detail explanation as to what precipitated the issuance of the service bulletin/document and its relevancy to the alleged defect.

9. Answer: The Quality Alert was issued to address the possibility of missing of loose screws.

10. 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.

10. Answer: At this time no analyses, tests, studies, surveys, simulations, investigations, inquiries and/or evaluations are planned.

11. 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.

11. Answer: There have been a few different panel configurations used over the years however all the panels were mounted to the bus body using the same sheet metal screws.

- a) The electrical panel was revised on 1-10-2005 when the electrical system was updated from hard wiring to PC boards. The panel mounting was modified in June 2006. The same mounting screws were used for all panel mounting.**
- b) A new panel was designed to accommodate mounting PC boards. The mounting of this board was changed from being screwed into the bus rafters to being screwed into brackets welded to the bus rafters. The mounting screw did not change.**
- c) Panel changed to accommodate PC board. Panel mounting changed to reduce assembly line installation time.**
- d) 52007333 was replaced by 52007526 in June 2006, see Attachment 5.0-5.3.**
- e) See (d)**
- f) Removed from production and became a service part.**
- g) Became a service part when it went into production.**
- h) No, the modified panel is not interchangeable.**

12. Produce a sample of any replacement part(s) or 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.

12. Answer: No replacement parts were made for service repair. The repair consisted of installing an OEM type screw which is a No. 10 x 5/8 sheet metal screw.

13. 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; and
- b. Any replacement part that have been released, or developed, by Freightliner for use in service repairs to the subject component/assembly.

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.

13. Answer:

a) There are no kits.

b) There are no replacement parts that were designed or developed.

14. 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; and
- 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.

14. Answer:

a) Panel mounting screw(s) may have been left out during OEM installation, or were removed and not reinstalled in the field.

b) The panel mounted to the bus that holds the circuit boards became loose.

c) The circuit board wire harness connector pulled loose or the panel rattled.

d) A bus circuit could stop functioning although there are three mounting screws and if one or even two were missing or loose, the panel should not become completely loose.

e) The panel rattles during bus operation alerting the driver of a problem.

15. Provide a copy of the electrical drawings depicting the subject electrical panel, its location, voltage loads, and identify each component attached to each panel and identify each load device that is supplied power from the PC board.

15. Answer: Electrical drawings 52004778 circuit board 1, 52004770 schematic and loads for the circuits in board 1; 52005555 circuit board 2, 52005370 schematic and circuit loads board 2, and a photo of the installed circuit boards are attached (6.0 – 6.4).

16. Identify what action Freightliner intends to take in this matter.

16. Answer: Thomas Quality control has been alerted to check the screw installation process. Thomas Bus is actively working with the customer to repair those buses with loose panels, see Attachment 7.0.