

DAIMLER

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

July 30, 2009

Richard Boyd, Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation (NVS-214)
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington D.C. 20590

Re: PE09-021 Alleged Side Wheel Chair Door Ajar

Mr. Boyd

The following information is in response to your June 17, 2009, request for information related to PE09-021. After a thorough review of the relevant facts, Daimler has concluded that the unseated door latch condition can not result in an automatic application of the vehicle's brakes. The complaint that initiated this investigation stemmed from a miss-adjusted door latch switch which resulted in an oversensitive and false latch open signals. This condition would cause a buzzer in the drivers compartment to sound, but could not cause the vehicle's brakes to be applied. Daimler Trucks North American does not believe a false door unlatched signal represents an unreasonable risk to motor vehicle safety.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Enclosure
Certified Mail# 7002 3150 0004 1405 4639

A Daimler Company

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

Model Year	Model	Number of Vehicles
2007	Saf-T-Liner EF	86
2007	Saf-T-Liner HDX	156
2008	Saf-T-Liner EF	144
2008	Saf-T-Liner HDX	257
2009	Saf-T-Liner EF	105
2009	Saf-T-Liner HDX	182
2010	Saf-T-Liner EF	106
2010	Saf-T-Liner HDX	35

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See attached File 'Production Data.xls'

2. State, by model year, and model, the total number of each of the following, received by Daimler, or of which Daimler 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;

One complaint received from Matthews Buses Inc. identified seven buses with difficult operation of doors which affected the operation of the door switches. See attached file 'Problem Ticket 3118281.txt'

- b. Field reports, including dealer field reports;

None

- 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;

None

- d. Property damage claims;

None

- e. Third-party arbitration proceedings where Daimler is or was a party to the arbitration; and

None

- f. Lawsuits, both pending and closed, in which Daimler is or was a defendant or codefendant.*

None

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 Daimler'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.

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. Daimler'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, and model year;*
 - f. Vehicle's mileage at time of incident;*
 - g. Incident date;*
 - h. Report or claim date;*
 - i. Whether the door unlatched while the bus was in motion;*
 - j. Number of alleged injuries, if any;*
 - k. Number of alleged fatalities, if any;*
 - l. Summary description of the complaints; and,*
 - m. Daimler' 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 Daimler during their evaluation of this issue.*

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

See attached File 'Request Number Three Data.xls'

4. State, by model year, and model, a total count for all of the following categories of claims, collectively, that have been paid by Daimler 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.

Model Year	Model	Warranty Claims	Pre-Delivery Warranty Claims
2007	Saf-T-Liner EF	4	1
2007	Saf-T-Liner HDX	10	0
2008	Saf-T-Liner EF	0	2
2008	Saf-T-Liner HDX	1	1
2009	Saf-T-Liner EF	0	6
2009	Saf-T-Liner HDX	0	0
2010	Saf-T-Liner EF	0	2
2010	Saf-T-Liner HDX	0	0

Pre-Delivery Warranty Claims are claims for repair made prior to vehicle being placed into service

5. Separately, for each such claim, state the following documentation/information:
 - a. Daimler'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, did the handle detach from the door;
 - k. Provide a copy of any related document including the claim or repair order;
 - l. Comment, if any, by dealer/technician relating to claim and/or repair; and
 - m. Daimler's assessment.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." **See attached file 'Warranty Data.xls'**

6. *Describe in detail the search criteria used by Daimler 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 Daimler 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 Daimler 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.*

Search was limited to claims on model year 2007 through 2010 Saf-T-Liner EF and HDX vehicles. Since no failure codes pertinent to this issue exist in the Consumer Complaint database, the search was based on the key words: lift, ajar, open, driving, and door. Warranty claims were search using failed component codes: 0251 Lift (single door) – shell, 0253 Lift (single door) – seal, 0255 Lift (single door) – latch/hinge/prob, 0257 Lift (double door) – shell, 0259 Lift (double door) – seal, and 0261 Lift (double door) – latch/hinge/prob.

Warranty Coverage – See attached file 'Thomas Built Buses Warranty.pdf'

7. *Describe how Daimler first became aware of the alleged defect and state the date on which Daimler first became aware of the possibility of the alleged defect. Provide a detailed **chronology** of all known door “ajar” incidents regarding the subject defect, starting from the time Daimler first became aware of this issue to present. Include all information and provide a copy of any document used at any internal/external meeting(s), meetings with the part supplier, or other manufacturers.*

Daimler first became aware of this issue through a conversation with NHTSA in March of 2009. No other complaints have been received for this issue since Daimler became aware of this issue.

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 Daimler 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 Daimler is planning to issue within the next 120 days. For each such document provide in responding to question 7, provide a detail explanation as to what precipitated the issuance of the service bulletin/document and it relevancy to the alleged defect.*

None

9. 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, Daimler. For each such action, provide the following information:
- Action title or identifier;
 - The actual or planned start and end date;
 - Brief summary of the subject and objective of the action;
 - engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - Brief summary of the findings and/or conclusions resulting from the action.

- Interlock operation test drive**
- July 1, 2009 through July 1, 2009**
- Verify operation of door latch interlock switch and ensure vehicle brakes do not apply unexpectedly.**
- Thomas Built Buses Engineering**
- With the door latch switch energized the vehicles brakes would not apply until the transmission was placed in neutral. System operated normally.**

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.

None

10. Describe all modifications or changes made by, or on behalf of, Daimler in the design, material composition, manufacture, quality control, supply, or installation of the side door latch mechanisms /door handles, 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:
- The date or approximate date on which the modification or change was incorporated into vehicle production;
 - A detailed description of the modification or change;
 - The reason (s) for the modification or change;
 - The part numbers (service and engineering) of the original component;
 - The part number (service and engineering) of the modified component;
 - Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - When the modified component was made available as a service component; and
 - Whether the modified component can be interchanged with earlier production components.

None

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

None

11. State the number of each of the following that Daimler has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model, model year of the vehicle, and material of the handle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

a. Replacement door latches or hardware;

Part Number	Part Description	2007	2008	2009
TBB 64005500	Latch Assembly	0	10	4
TBB 24093365	Gear	9	7	10
TBB 64005509	Hinge RS	10	0	1
TBB 64005521	Hinge LS	10	0	1

Note: Although the lift door interlock system is unique to the subject vehicles, the latch assembly and associate parts listed above are common to door assemblies on many Thomas Bus models. The lift door interlock system is designed by Thomas Built Buses.

b. Any kits that have been released, or developed, by Daimler for use in service repairs to the subject component/assembly; and

None

c. Any replacement part that have been released, or developed, by Daimler for use in service repairs to the subject component/assembly.

None

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 Daimler is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

See note in response to 11.a above.

12. *Furnish Daimler's assessment of the alleged defect in the subject vehicle, including:*

a. The causal or contributory factor on why the door failed to stay latched(s);

The door does not fail to stay latched. Some vehicles were found to have improperly adjusted door latch interlock switches and/or doors causing a false door unlatched signal to be transmitted to the driver. This situation can not cause an automatic application of the vehicle's brakes.

b. The failure mechanism(s);

False door unlatched signal

c. The failure mode(s);

False warning buzzer

d. The risk to motor vehicle safety that it poses;

None

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

A warning buzzer in the driver's compartment, and if so equipped, illumination of the wheel chair loading area.

f. The reports discussed with your staff and related to this inquiry.

None

13. Provide a detailed description as to what action was taken to remedy the buses found in New York.

The vehicles door and switches were or will be adjusted as required to ensure non-sensitive operation of the door latch warning / interlock system.

14. Identify what action Daimler intends to take in this matter.

None