

DAIMLER

Daimler Trucks North America

Nasser Zamani
Senior Manager
Compliance and Regulatory Affairs

March 11, 2013

Jennifer Timian
Chief, Recall Management Division (NVS-215cg)
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington D.C. 20590

Re: Safety Recall EQ12-011

Ms. Timian,

The letter is in response to your request for information pertaining to certain MGM Brake, Type 24 J-Series piston parking brake chambers. Daimler Trucks North America (DTNA) has found no evidence indicating a defect related to an unreasonable risk to motor vehicle safety exists in the subject MGM parking brake chambers when installed as original equipment on DTNA vehicles.

Between November 2010 and March 2012 DTNA manufactured 148 vehicles equipped with the subject MGM parking brake chambers. Each of these vehicles was equipped with two of the subject chambers. To date, DTNA has received reports of six chambers from these 148 vehicles developing leaks which required chamber replacement. All six of these reports indicate that the air leaking from the chamber was identified by the driver prior to any brake drag problems developing. DTNA has no information indicating that these failures could have lead to the service brakes locking up without warning, and believes the failure rates for these products on this group of vehicles is within the normally expected range.

Air actuated parking brake chambers are a consumable commodity which typically develop air leaks requiring replacement several times over the useful life of a vehicle. As these chambers develop air leaks the vehicle's operator receives a series of warnings allowing the operator ample time to ensure the chambers are replaced before additional problems develop. In the case of the six failures noted above the operators received adequate warning, and took appropriate action to ensure their vehicles were properly maintained.

In your letter dated February 12, 2013, you state that MGM Brake reported shipping 887 suspect chambers to DTNA: 591 for use in production, and 296 for sale in the aftermarket. This information does not agree with DTNA records, or the information provided to DTNA by MGM Brake. Between March 2011 and October 2011 (inclusive) DTNA manufactured 148 vehicles incorporating 296 of the subject MGM chambers as original equipment. DTNA believes that these 296 chambers represent the extend of subject chambers DTNA has supplied as original equipment on its vehicles, and has found no evidence indicating a defect related to an unreasonable risk to motor vehicle safety exists in these 296 chambers.

DTNA understands that it has been instrumental in the distribution of a number of the subject brake chambers for use as replacement equipment though several of its distribution channels. MGM Brake, the equipment manufacturer, has not notified DTNA that it has determined that a safety related defect exists in any of the subject components distributed by or through DTNA, or that DTNA needs to take any action towards recovering these products from the field. Based on recent conversations with MGM Brake, DTNA does not expect any such notice to be forthcoming.

Please note that your February 12, 2013 letter regarding this issue was sent to one of DTNA's East Coast offices, which caused some delay in it reaching my office. Your letter was received by my office on March 1, 2013.

Please contact me if you have any questions.

Sincerely yours,

A handwritten signature in black ink that reads "Nasser Zamani". The signature is written in a cursive, flowing style.

Nasser Zamani

Via E-mail: rmd.odi@dot.gov & Cynthia.glass@dot.gov