

Contains Confidential Business Information
PE 18-004 DTNA Response

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

As indicated, the repeated requests have been modified as per Kyle Bowker’s email of June 1, 2018. Revisions are noted within the specific requests.

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

Response to Request No. 1:

Table 1 provides the quantity for each model year 2011 through 2016 DTNA of Cascadias manufactured for use in the United States and Territories. This number includes complete as well as incomplete vehicles, and also includes glider repair chassis which need to have major components installed by customers. In addition to the requested information, additional columns have been added to provide the number of vehicles equipped with PNDBs and those not so equipped for each model year.

Table: Cascadia Production			
Model Year	Total	With PNDB	W/O PNDB
2011	████████	████████	████████
2012	████████	████████	████████
2013	████████	████████	████████
2014	████████	████████	████████
2015	████████	████████	████████
2016	████████	████████	████████
Total	████████	████████	████████

Separately, for each subject vehicle manufactured to date by DTNA, state the following:

- Vehicle identification number (VIN);*
- Make;*
- Model;*
- Model Year;*
- PNDB component part number(s) and design version(s) installed as original equipment; (modified by Kyle Bowker, 6/1/18)*
- Date of manufacture;*
- Date warranty coverage commenced; and*
- The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).*

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The requested information is provided in table form within the file titled “Confidential Business Information PRODUCTION

Files – Confidential Business Information PRODUCTION DATA-Cascadia MY 2011 to 2016.xlsx

2. State the number of each of the following, received by DTNA, or of which DTNA 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;
 - d. Reports involving a fire;
 - e. Reports involving a non-fire thermal event;
 - f. Property damage claims;
 - g. Third-party arbitration proceedings where DTNA is or was a party to the arbitration; and
 - h. Lawsuits, both pending and closed, in which DTNA is or was a defendant or codefendant.

For subparts "a" through "h," 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).

Response to Request No. 2:

Communications of issues from sources external of Corporate DTNA are enumerated in Table 2.

Table 2: External Communications	
Category	Number of Reports
a. Consumer complaints	1
b. Field reports	15
c. Reports involving a crash, injury or fatality	0
d. Reports involving a fire	1
e. Reports involving a non-fire thermal event	4
f. Property damage claims	1
g. Third-party arbitration proceedings	0
h. Lawsuits	0
Total number of vehicles with reports	16

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. DTNA’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.);

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- c. *Vehicle owner or fleet name (and fleet contact person), street address, email 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. *Alleged defect category (1,2,3 4 and/or 5 as defined in "Alleged defect(s)" above; or undetermined);*
- j. *Whether a crash is alleged;*
- k. *Whether a loss of motive power or engine stall is alleged;*
- l. *Whether a fire is alleged;*
- m. *Whether a non-fire thermal event is alleged;*
- n. *Whether property damage is alleged;*
- o. *Number of alleged injuries, if any; and*
- p. *Number of alleged fatalities, if any.*

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Response to Request No. 3:

The requested information is provided in table form within the file titled "Confidential Business Information REQUEST NUMBER TWO DATA"

Files – Confidential Business Information REQUEST NUMBER TWO DATA.xlsx

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 DTNA used for organizing the documents. Describe in detail the search methods and search criteria used by DTNA to identify the items in response to Request No. 2.*

Response to Request No. 4:

DTNA Field Service and Legal systems were searched for reports on the subject vehicles that included the word "PNDB" in the comments field. The reports were manually reviewed and reports which relate to or may relate to the alleged defect are included. Wherever possible, attachments to documents have been merged into the primary to ensure the relationship is maintained.

Files – Confidential Business Information REQUEST NUMBER TWO Documents

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

Because the definition of "alleged defect" also contains "subject component(s)," DTNA's search criteria for responsive warranty claims data does not need to include a search for associated fuses and electrical wiring. However, if a responsive warranty claim happens to also include data that relates to the associated fuses and electrical wiring, that data is to be included in DTNA's response. (Paragraph added per modification from Kyle Bowker 6/1/18)

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

- a. DTNA's claim number;*
- b. Vehicle owner or fleet name (and fleet contact person), street address, email address 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(s);*
- h. Problem code(s);*
- i. Diagnostic trouble code(s);*
- j. Replacement part number(s) and description(s);*
- k. Concern stated by customer;*
- l. Cause as stated on the repair order;*
- m. Correction as stated on the repair order; and*
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.*

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

Response to Request No. 5:

Warranty records in the DTNA warranty database, identified as described in Request Number 6 below, are enumerated in Table 3.

Three categories, WARRANTY, EXTENDED WARRANTY, and MAINTENANCE CONTRACT are self-explanatory. POLICY are claims not covered by our warranty or extended warranty programs, yet are paid to promote customer good will per the decision of a DTNA District Service Manager. REPLACEMENT PARTS are claims against warranted service parts installed at a DTNA service location, both parts and labor are covered. MISC. REPLACEMENT PARTS are claims against warranted service parts not installed at a DTNA service location, only parts are covered. SALES TERM relate to vehicles sold with a guaranteed buy back requiring work to return them to appropriate condition for used vehicle sales. TRANSPORTER covers claims to repair damage to new undelivered vehicles found or caused in transit to the ordering dealership. WCP POLICY is a retired program named Warranty Certification Program where individual certified dealers were allowed to make limited decisions to pay policy claims for out-of-warranty vehicles on their own approval.

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Table 3: Cascadia PNDB Claims for Cascadias by Model Year						
	2011	2012	2013	2014	2015	2016
WARRANTY						
EXTENDED WARRANTY						
POLICY						
MAINTENANCE CONTRACT						
REPLACEMENT PARTS						
MISC. REPLACEMENT PARTS						
SALES TERM						
TRANSPORTER						
WCP POLICY						

The additional requested information is provided in table form within the file titled “Confidential Business Information WARRANTY DATA-Cascadia MY 2011 to 2016 PNDB.” No replacement part information is provided as DTNA practice is to replace with same if inventory is available. If a part is superseded by a new part maintaining backward interchangeability, defined by DTNA as having the same form, fit and function, the new part may be provided as a customer service part at the discretion of the DTNA service location but such is not recorded within the fields stored in the DTNA warranty database. Such notations are made only if there is a service campaign or recall to address an issue. If a part has been obsoleted as the result of a recall, obsoleted parts in inventory are disposed of and only the new parts are available and service information sources are updated to note the change.

Files – Confidential Business Information WARRANTY DATA-Cascadia MY 2011 to 2016 PNDB.xlsx

- Describe in detail the search methods and search criteria used by DTNA to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

Provide a list of all labor operations, labor operation descriptions, problem codes, problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defects in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

State, by make and model year, the terms of the new vehicle warranty coverage offered by DTNA 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 DTNA 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.

Response to Request No. 6:

The DTNA warranty database was searched to respond to Request Number 5.

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All claims were collected on model year 2011 through 2016 Cascadias with a primary failed part number matching any of the part numbers of PNDBs identified as original equipment in the subject vehicles. These parts are itemized in Table 4:

Table 4: PNDBs Configured & Basic used in Subject Vehicles	
06-72686-000	PNDB,WITHOUT CUTOFF SOLENOID
06-72686-001	PNDB,W/O CUTOFF SOL WITH
06-75147-000	PNDB-WITH CUTOFF SWITCH
06-92801-000	PNDB LVD W/12.2V C/O
A06-72138-000	CONFIG-PNDB, WITHOUT CUTOFF SW
A06-72138-009	CONFIG-PNDB,WITHOUT CUTOFF SW
A06-72138-010	CONFIG-PNDB,WITHOUT CUTOFF SW
A06-72138-012	CONFIG-PNDB,WITHOUT CUTOFF SW
A06-72138-019	CONFIG-PNDB,WITHOUT CUTOFF SW
A06-73962-005	AUX PNDB,WITHOUT CUTOFF SWITCH
A06-73962-006	AUX PNDB WITHOUT CUTOFF SWITCH
A06-75148-000	CONFIG-PNDB,W/CUTOFF SWITCH
A06-75148-009	CONFIG-PNDB,W/O CUTOFF SW,P3
A06-75148-010	CONFIG-PNDB,WITH CUTOFF SW,P3
A06-75148-011	CONFIG-PNDB,WITH C/O SW,P3
A06-75148-012	CONFIG-PNDB,WITH CUTOFF SW
A06-75148-019	CONFIG-PNDB,WITH CUTOFF SW
A06-75208-008	AUX PNDB,WITH CUTOFF SWITCH
A06-75208-009	AUX PNDB WITH CUTOFF SWITCH
A06-90281-000	CONFIG-PNDB LVD W/ 12.2V C/O,
A06-91154-000	CONFIG-PNDB,PARKSMART
A22-72116-000	HARN-PHVAC,ELECTRICAL CTR,P3
A22-72116-001	HARN-PHVAC,ELECTRICAL CTR,P3
A22-72545-000	HARN-PHVAC,ELECTRICAL CENTER
A22-72545-001	HARN-PHVAC,ELEC CTR,WO/SEP

To these were added the claims from the subject vehicles citing one of the VMRS numbers of the three possible PNDBs as listed in Table 5:

Table 5: PNDB VMRS Codes	
034-004-181	Primary PNDB
034-004-031	AUX PNDB
001-003-030	HVAC PNDB

After merging the two groups, duplicates as identified by the warranty claim number were eliminated to create the final list. The final list of Warranty Claims is documented in the file

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named “Confidential Business Information WARRANTY DATA-Cascadia MY 2011 to 2016 PNDB”.

Files – Confidential Business Information WARRANTY DATA-Cascadia MY 2011 to 2016 PNDB.xlsx

Table 6 provides the available SRT codes for replacing the PNDB unit. Information about warranties is manually input at service locations and uploaded through VPN Internet connection to the DTNA Warranty System. No information with regards to the issues of the Warranty Claim are supplied automatically.

Table 6: SRT Codes for PNDB Replacement		
VMRS Code	034-004-181	Module-Main Power
Corrective Action	03	Replace With New
SRT Codes	034-004BB	Wiring-Power Distribution System Diagnostics-Easy
	034-004CC	Wiring-Power Distribution System Diagnostics-Moderate
	034-004EE	Wiring-Power Distribution System Diagnostics-Difficult
	285-5025A	POWERNET Distribution Box Fuse Retention on the Keep-Alive Circuit
	285-6030A	Power Distribution Module, PNDB, R/R
VMRS Code	034-004-031	Box-Junction
Corrective Action	03	Replace With New
SRT Codes	034-004BB	Wiring-Power Distribution System Diagnostics-Easy
	034-004CC	Wiring-Power Distribution System Diagnostics-Moderate
	034-004EE	Wiring-Power Distribution System Diagnostics-Difficult
	285-6005A	Power Distribution Module (PDM), AUX, R/R
	285-6011A	Power Distribution Module, Mega Fuse, R/R
	285-6013A	Ground Junction Block, MGJB, R/R
	599-6049A	Breaker Box, Assembly, ABP APU, R/R
VMRS Code	001-003-030	Wiring Harness-Main, Auxiliary Heater Assembly
Corrective Action	03	Replace With New
SRT Codes	001-003CC	AUX Heater-Park Smart Diagnostics-Easy
	001-003DD	AUX Heater-Park Smart Diagnostics-Moderate
	001-003EE	AUX Heater-Park Smart Diagnostics-Difficult
	689-6201D	HVAC AUX, Electrical Center, R/R

DTNA provides three different warranty coverages for heavy trucks such as the subject vehicle. The warranty applying to a specific vehicle is dependent upon several factors such as application, road conditions, and Gross Weights. The Freightliner Level I warranty applies to long haul vehicles operated 100% on smooth concrete or asphalt with a maximum GCW of

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92,000 lb. provides a basic vehicle warranty of 100,000 miles or 1 year, whichever comes first. The Freightliner Level II Warranty covers vehicles with up to 30% off-highway and a GCW of 140,000 lb. or less. It also has basic vehicle coverage for 1 year and 100,000 miles. The Freightliner Level III is for vehicles that don't fit into the other two groups. It provides basic vehicle coverage for 1 year and 50,000 miles. Within all three of these groups, there are specific components that have both greater and lesser periods of coverage, time and distance. Those details are spelled out in the Warranty Manual provided at the delivery of every new Freightliner.

Extended warranty coverages and prices are negotiated for at the time of purchase if the customer is desirous of such an option.

7. *Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that DTNA 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 DTNA is planning to issue within the next 120 days.*

Response to Request No. 7:

DTNA has identified two items falling within this group of communications and these are provided in the files "Service Solution 3615" and "Service Bulletin 54-287".

DTNA is developing a communication to the service organization that includes the Cascadia PNDB. A draft copy is included as file "Confidential Business Information Draft Cascadia Powernet Connections v3".

Files - Service Bulletin 54-287.pdf

Files - Service Solution 3615.pdf

Files - Confidential Business Information Draft Cascadia Powernet Connections v3.pdf

8. *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, DTNA. 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.

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Response to Request No. 8:

Table 7: PNDB Testing/Investigation: Page1						
Report Number	Report Description	Activity Start	Activity End	Summary/Objective	Performed By	Findings/Conclusions
DVPR00138	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
PTG086	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
PTF002	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
PTF327	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
PTH911	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
PTK434	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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Table 7: PNDB Testing/Investigation: Page2						
Report Number	Report Description	Activity Start	Activity End	Summary/Objective	Performed By	Findings/Conclusions
PTK436	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
14-061	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
15-094	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
16-145	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
17-133	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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In addition to the actions listed above, DTNA has also provided PNDB-related information to NHTSA upon request. These information items are listed below:

Table 8: PNDB Information Provided to NHTSA: Page1						
Report Number	Report Description	Activity Start	Activity End	Summary/Objective	Performed By	Findings/ Conclusions
14-080	M2 PNDB Thermal Event	7/8/14	7/17/14	Request by NHTSA to provide Incident Report 3371	DTNA Vehicle Compliance	No Report. Document provided
15-087	PNDB NDFR 13Q1 SeqID 62	11/16/15	11/19/15	Request by NHTSA to provide CAC Report 22513	DTNA Vehicle Compliance	No Report. Document provided 11/19/15
15-088	PNDB NDFR 14Q1 SeqID 228	11/16/15	11/19/15	Request by NHTSA to provide CAC Report 23856	DTNA Vehicle Compliance	No Report. Document provided 11/19/15
15-089	PNDB NDFR 14Q1 SeqID 340	11/16/15	11/19/15	Request by NHTSA to provide CAC Report 23952	DTNA Vehicle Compliance	No Report. Document provided 11/19/15
15-090	PNDB NDFR 14Q2 SeqID 243	11/16/15	11/19/15	Request by NHTSA to provide CAC Report 24306	DTNA Vehicle Compliance	No Report. Document provided 11/19/15
15-091	PNDB NDFR 14Q2 SeqID 279	11/16/15	11/19/15	Request by NHTSA to provide CAC Report 24330	DTNA Vehicle Compliance	No Report. Document provided 11/19/15
15-091	PNDB NDFR 14Q2 SeqID 279	11/16/2015	11/19/2015	Request by NHTSA to provide CAC Report 24330	DTNA Vehicle Compliance	No Report. Document provided 11/19/15
15-092	PNDB NDFR 15Q1 SeqID 518	11/16/2015	11/19/2015	Request by NHTSA to provide CAC Report 25776	DTNA Vehicle Compliance	No Report. Document provided 11/19/15
15-093	PNDB NDFR 15Q1 SeqID 403	11/16/2015	11/19/2015	Request by NHTSA to provide CAC Report 25621	DTNA Vehicle Compliance	No Report. Document provided 11/19/15

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Files – Confidential Business Information REQUEST NUMBER 8 Documents

Files – Materials previously provided to NHTSA

9. *Describe all modifications or changes made by, or on behalf of, DTNA 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 number(s) (service and engineering) of the original component;*
 - e. The part number(s) (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 DTNA is aware of which may be incorporated into vehicle production within the next 120 days.

Response to Request No. 9:

DTNA does not control parts by revision level, but by part number. If a revision will affect Form, Fit or Function, a new part number is assigned and the new part and all related parts will go into production on a date when production quantities of all parts are available both to the plants and to the DTNA Service Organization. The file “Cascadia PNDB Supersession List” documents all of the PNDBs the subject vehicles were built with and their replacements. The start and finish dates are the dates on which the new parts are delivered or removed from the assembly line, and for which the truck specified bills of material are updated to match.

Files – Cascadia PNDB Supersession List.PDF

There are no changes planned to the existing products in the next 120 days.

10. *Produce one of each of the following:*

- a. One exemplar sample of the design version of the subject PNDB assembly (including fuses) originally equipped on the greatest number of subject vehicles; and one exemplar sample of the design version of the subject PNDB assembly (including fuses) originally equipped on the second greatest number of subject vehicles; (Modified per Kyle Bowker 6/1/18 letter); and*
- b. Any kits that have been released, or developed, by DTNA for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.*

Response to Request No. 10:

Exemplars of A06-75148-012 and A06-72138-012, the two PNDBs most used in the subject vehicles, have been ordered and upon receipt will be shipped to the Senior Safety Defects Engineer of this case. DTNA has not developed or sold any kits to update or upgrade the subject component.

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11. State the number of each of the following that DTNA 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. PNDB assemblies; (Modified per Kyle Bowker 6/1/18 letter) and
- b. Any kits that have been released, or developed, by DTNA 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 DTNA is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response to Request No. 11:

The new information in response to this request is contained in the file named "Confidential Business Information Cascadia PNDB Service Part Demand". Information provided previously is found in "Confidential Business Information "Cascadia PNDB Supersession List" provided in response to Request Number 9.

Files – Confidential Business Information Cascadia PNDB Service Part Demand.pdf

12. Furnish DTNA'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. The reports included with this inquiry.

Response to Request No. 12:

DTNA cannot provide an assessment at this time. Previous efforts to identify PNDB issues focused on specific problem codes indicated in reports from the field making them much narrower in scope, which was consistent with the very limited reports the company was receiving from the field. In contrast, the list of alleged defects stated in this PE approached all of the versions of PNDB used in the Cascadia with a broad definition of issues producing a much larger number of claims than considered before. DTNA takes this issue seriously and is reviewing the warranty claims gathered for the response. When an assessment is available, it will be forwarded to the Senior Safety Defects Engineer of this case.