

DAIMLER

Daimler Trucks North America
Andy Jones
Manager
Compliance and Regulatory Affairs

VIA FEDERAL EXPRESS

November 20, 2019

Mr. Jonathan Morrison
Chief Counsel
Office of the Chief Counsel (NCC-100)
National Highway Traffic Safety Administration
West Building, W41-326
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Response to NHTSA Audit Query AQ18-002 Request Nos. 18 – 20 Regarding the Scope and Timeliness of DTNA's Recall Nos. 17V-761, 17V-810, 18V-157, and 18V-163, and 18V-190

Dear Mr. Morrison:

Daimler Trucks North America LLC ("DTNA") is submitting its response to the National Highway Traffic Safety Administration ("NHTSA" or "Agency") Office of Defects Investigation's Audit Query AQ18-002.

Pursuant to consultations with NHTSA, responses to Request Nos. 1 – 4 were submitted on October 5, 2018, responses to Request Nos. 30 – 46 were submitted on October 17, 2018, responses to Request Nos. 5 – 12 and 29 were submitted on August 30, 2019, and responses to Request Nos. 13-17 were submitted on October 18, 2019. Responses to Request Nos. 18-20, regarding Recall No. 18V-157, are contained in this response.

Request Nos. 18 – 20 of NHTSA's Audit Query are repeated below, followed by the corresponding response.

For ease of review, the supporting documents for this response are Bates labeled and a document index is provided, as well as a privilege log.

Regarding Recall No. 18V-157 – Wheelchair Lift Can Be Operated While Not In Park

Request No. 18:

DTNA's chronology contained in the Part 573 Report for NHTSA Recall No. 18V-157 states that at the end of November 2017 a dealership reported that a group of new buses could be moved while the wheelchair lift was in operation, and that DTNA began an investigation to understand the

potential consequences and determine the scope of the issue. Respond to the following requests relating to this part of the chronology:

- (a) Explain the manner in which the dealership notified DTNA of the subject defect;*
- (b) Describe any documentation or information provided to DTNA by the dealership relating to the subject defect;*
- (c) Identify and describe the nature of DTNA's investigation;*
- (d) Identify whether the action is one routinely taken by DTNA in instances where a safety defect may exist;*
- (e) Explain any conclusions that came from DTNA's investigation including whether it was determined that a safety defect existed; and*
- (f) Provide copies of all documents, including by not limited to presentations, executive summaries, summary findings, memoranda, agendas, or recommended actions, whether in final or draft, associated with or used to reach the conclusion in DTNA's November 2017 investigation.*

Response to Request No. 18:

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The requested documents are provided as Attachment 1.

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] DTNA last gathered information for this

Request in November 2019.

Request No. 19:

DTNA's chronology contained in the Part 573 Report for NHTSA Recall No. 18V-157 states that in March 2018 DTNA decided to voluntarily recall certain Thomas Built Buses equipped with wheelchair lifts. Respond to the following requests relating to this part of the chronology:

- (a) Provide a detailed chronology of the events (including the principal actors) that occurred between when the dealership reported to DTNA that a group of new buses had a safety defect and when DTNA decided to initiate Recall No. 18V-157; .*
- (b) Identify whether the actions are ones routinely taken by DTNA in instances of a dealership reporting a safety defect in one or more DTNA vehicles; and*
- (c) Provide copies of all documents, including but not limited to presentations, executive summaries, summary findings, memoranda, agendas, or recommended actions, whether in final or draft, associated with or used to reach the conclusion for DTNA to issue voluntary safety NHTSA Recall No. 18V-157.*

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Response to Request No. 19:

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The requested documents are provided as Attachment 2.

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] DTNA last gathered information for this

Request in November 2019.

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If you are contending that DTNA filed a Part 573 Report with NHTSA relating to the defect in the subject vehicles prior to March 7, 2018:

- (a) Produce a copy of all documents to support your contention, and
- (b) Produce a copy of all notices, bulletins, dealer notifications, and other communications that relate to the recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s) (sent to more than one manufacturer, distributor, dealer, or purchaser/owner) provided to NHTSA's Recall Management Division, along with any documentation of NHTSA's receipt of such communications.

Response to Request No. 20:

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Please do not hesitate to contact us should you have any questions regarding this response.

Sincerely,

Andy Jones

cc: Jeffrey Evers, Office of the Chief Counsel