

# DAIMLER

Daimler Trucks North America  
Andy Jones  
Manager  
Compliance and Regulatory Affairs

**CONFIDENTIAL BUSINESS INFORMATION REDACTED**

**VIA FEDERAL EXPRESS**

December 19, 2019

Bruce York, Chief  
Medium and Heavy Duty Vehicle Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

**Re: Preliminary Evaluation PE19-007 to Investigate Allegations of Cracked and Detached Rear Leaf-style Suspension Springs in Model Year 2008-2018 Thomas Built School Buses; Response to Information Request Nos. 11-13**

Dear Mr. York:

Daimler Trucks North America LLC ("DTNA") is submitting its additional response to the National Highway Traffic Safety Administration ("NHTSA" or "Agency") Office of Defects Investigation's July 2, 2019 request for information relating to the Agency's investigation of allegations of cracked and detached rear leaf-style suspension springs in model year (MY) 2008-2018 Thomas Built school buses.

Pursuant to consultations with NHTSA and an extension request granted by the Agency, responses to Requests 1-10 were provided October 1, 2019. Responses to Requests 11-13 are provided today.

Request Nos. 11-13 of your July 2, 2019 letter are repeated below, followed by the corresponding response.

**Request No. 11:**

*Provide copies of all documents relating to all communications between Thomas Built and FirstGroup America, First Transit and First Student regarding the alleged defect in the subject component. Organize the document copies in chronological order.*

**Response to Request No. 11:**

[

] DTNA last gathered information responsive to this Request in  
December 2019.

**Request No. 12:**

*Provide copies of all documents transmitted internally within Thomas Built that relate to the durability of the subject component.*

**Response to Request No. 12:**

[

] DTNA last gathered information responsive to this Request in  
December 2019.

**Request No. 13:**

*Furnish Daimler Trucks North America'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;*
- 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*
- f. The reports included with this inquiry.*

**Response to Request No. 13:**

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December 2019.

] DTNA last gathered information responsive to this Request in

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

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Jones". The signature is written in a cursive, slightly slanted style.

Andy Jones