

Daimler Trucks North America  
Andy Jones  
Manager  
Compliance and Regulatory Affairs

## CONFIDENTIAL BUSINESS INFORMATION REDACTED

### VIA FEDERAL EXPRESS

October 1, 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**

Dear Mr. York:

Daimler Trucks North America LLC ("DTNA") is submitting its response to the National Highway Traffic Safety Administration ("NHTSA" or "Agency") in response to the 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 are provided today. Responses to Requests 11-13 will be provided at a later date.

Following the summary overview section, Request Nos. 1-10 of your July 2, 2019 letter are repeated below, followed by the corresponding response.

### **Summary Overview**

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**Request Nos. 1-10**

**Request No. 1:**

State, by model and model year, the number of subject vehicles Daimler Trucks North America has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Daimler Trucks North America, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Subject component part number and design version installed as original equipment;
- f. Manufacturer of the subject component identified in preceding request;
- g. Date of vehicle manufacture;
- h. Date warranty coverage commenced; and
- i. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

**Response to Request No. 1:**

The number of subject vehicles DTNA has manufactured for sale or lease in the United States is as follows:

Vehicle Production Count by Model and Model Year													
		Model Year											
	Model	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Grand Total
THOMAS SAF-T-LINER	C2 (B2 106 CH) **	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
	C2 (B2 HEV CH) **			[ ]	[ ]	[ ]							[ ]
	EFX	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
	HDX	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
Minotour	Minotour DRW	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
	Minotour SRW	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
<b>Grand Total</b>		[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]

[ ]

\*\* Chassis Models marked as "B2 106 CH" and "B2 HEV CH" collectively are Thomas Saf-T-Liner C2 buses.

The additional information requested in Request No. 1 is provided in Attachment 1, Production Data.

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DTNA last gathered information responsive to this Request in September 2019.

**Request No. 2:**

*State the number of each of the following, received by Daimler Trucks North America, or of which Daimler Trucks North America 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. Property damage claims;*
- f. Third-party arbitration proceedings where Daimler Trucks North America is or was a party to the arbitration; and*
- g. Lawsuits, both pending and closed, in which Daimler Trucks North America is or was a defendant or codefendant.*

*For subparts "a" through "f, / g," 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, / g," provide a summary description of the alleged problem and causal and contributing factors and Daimler Trucks North America's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e/f" and "f, / g," 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.*



**Response to Request No. 3:**

The information requested in Request No. 3 is provided in Attachment 2, Request Number Two Data.

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

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

**Response to Request No. 4:**

The information requested in Request No. 4 is provided in Attachment 3, Request Number Two Documents. The documents are organized as follows: Consumer Complaint Documents; and Field Report Documents. [

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

**Request No. 5:**

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

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

- a. Daimler Trucks North America'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. Whether a piece of the fractured leaf spring separated from the vehicle;*
- l. Concern stated by customer;*
- m. Cause as stated on the repair order;*
- n. Correction as stated on the repair order; and*
- o. 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:**

The total count 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, is as follows:

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The additional information requested in Request No. 5 is provided in Attachment 4, Warranty Data.

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

**Request No. 6:**

*Describe in detail the search methods and search criteria used by Daimler Trucks North America 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, and problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defect 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 Daimler Trucks North America 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 Trucks North America 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:**

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The new vehicle warranty coverage offered by DTNA on the subject vehicles is as follows:

- For Thomas Saf-T-Liner C2 platforms: Subject vehicles are covered under the base warranty for a period of three years (36 months) or 50,000 miles, whichever occurred first, for orders received after August 6, 2014. For orders received prior to August 6, 2014, the base warranty was one year with unlimited miles. Additional extended coverage for the vehicle and/or components may be negotiated at the time of vehicle purchase.
- For Thomas Saf-T-Liner EFX and HDX platforms: Subject vehicles are covered under the base warranty for a period of one year with unlimited miles. Additional extended coverage for the vehicle and/or components may be negotiated at the time of vehicle purchase.

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] DTNA last gathered information

responsive to this Request in September 2019.

**Request No. 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 Daimler Trucks North America 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 Trucks North America is planning to issue within the next 120 days.*

**Response to Request No. 7:**

[

] DTNA last gathered information

responsive to this Request in September 2019.

**Request No. 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, Daimler Trucks North America. 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.*

**Response to Request No. 8:**

The actions that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, or are planned by DTNA are described in the following tables:

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The documents requested in Request No. 8 are provided in Attachment 5, Assessments.

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

**Request No. 9:**

*Describe all modifications or changes made by, or on behalf of, Daimler Trucks North America 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 Daimler Trucks North America is aware of which may be incorporated into vehicle production within the next 120 days.*

**Response to Request No. 9:**

All modifications or changes made by, or on behalf of, Daimler Trucks North America 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, or may be incorporated into vehicle production within the next 120 days, are described in the following tables:

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**Request No. 10:**

*State the number of each of the following that Daimler Trucks North America has sold that may be used in the subject vehicles by component name, component manufacturer 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. *Subject component;*

*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 Trucks North America 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. 10:**

The requested part sales and related information for the subject component is provided in Attachment 6, Part Sales Data.

The contact information for the component supplier is as follows:

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

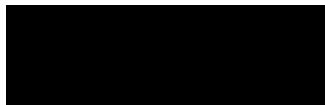
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Please do not hesitate to contact us should you have any questions regarding this response.

Sincerely,



Andy Jones