

DAIMLER

Daimler Trucks North America LLC  
Larissa Stoffels  
Executive Manager, Vehicle Safety  
Compliance and Regulatory Affairs  
4747 N. Channel Ave  
Portland, OR 97217

**PUBLIC VERSION**

November 20, 2020

**VIA ELECTRONIC SUBMISSION ONLY**

Mr. Bruce York  
Chief, Medium & Heavy Duty Vehicle Division  
National Highway Traffic Safety Administration (NHTSA)  
Office of Defects Investigation  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Dear Mr. York:

Enclosed is Daimler Trucks North America LLC's ("DTNA") response to the National Highway Traffic Safety Administration's ("NHTSA") Office of Defects Investigation ("ODI") September 29, 2020 Information Request (sometimes referred to below as "IR") in connection with the agency's Recall Query ("RQ") (RQ20-001).

NHTSA opened RQ20-0001 August 31, 2020, as set forth in the agency's Opening Resume. This investigation involves allegations of water intrusion into the Signal-detect and Activation ("SAM") cab modules resulting in the loss of electricity functions and potential fire, increasing the risk of a crash and personal injury in certain model year ("MY") 2007-2021 Freightliner Cascadia vehicles equipped with a SAM cab module manufactured for sale or lease in the United States.

DTNA's good faith assessment of this matter is preliminary and ongoing. The company welcomes a meeting and further conversation at the agency's earliest convenience to discuss these and related matters. DTNA is committed to continuing an open, transparent dialogue with the agency, leading to a prompt and principled resolution of all relevant matters.

**I. General Responses**

A. NHTSA provided DTNA the IR on Friday, October 2, 2020 via e-mail. The IR contained a due date of "October 20, 2020." Pursuant to a telephone discussion in or about the

end of the week of October 5, 2020, and as set forth between an exchange of e-mails between us on October 9 and 13, 2020, the agency stated that the response date in the IR was not correct, and confirmed that the correct due date was Friday, November 20, 2020.

B. DTNA's response to this IR was based on good faith searches of locations where responsive documents kept in the ordinary course of business would normally be found, and in consultation with current personnel knowledgeable about the information requested.

C. Consistent with its General Objections set forth below, DTNA has made a good faith effort to collect the information necessary to respond to the IR, and reserves the right to amend and/or supplement this response, as appropriate.

D. Without waiving any objections set forth below, DTNA's responses reflect information for all "Subject vehicle(s)" equipped with the "Subject component(s)" with the "Alleged defect," as those definitions appear in the Information Request.

E. DTNA reserves the right to recapture privileged or otherwise protected or exempted documents that may have been inadvertently produced in response to this IR under applicable law. Any inadvertent production of privileged material is not, and should not be interpreted as, a waiver of any applicable privilege.

F. The information provided in this response is current as of November 11, 2020 and reflects DTNA's best, good faith understanding of the data as of that date.

## **II. General Objections**

The General Objections set forth herein are incorporated by reference into each and every one of DTNA's responses to the IR. These General Objections apply to today's response, and any subsequent supplementation. These General Objections are also deemed as continuing as to each subpart of the IR question, and are not waived, nor in any way limited, by the specific responses to a subpart. No failure to specifically incorporate General Objections shall be construed as a waiver. Moreover, any applicable, good faith objection not raised in this section shall not be interpreted as a waiver.

A. DTNA respectfully objects to the definition of "document(s)" set forth in the IR because it is unreasonably broad, vague, and ambiguous in the context of the information sought by this IR.

B. DTNA respectfully objects to the definition of "Subject vehicles" to the extent that it encompasses so-called "P4" Freightliner Cascadia vehicles that do not contain the SAM Cab module identified in ODI's August 31, 2020 Opening Resume, and thus, do not reasonably relate to the "Alleged defect." Accordingly, DTNA's responses to the IR reasonably only include data pertaining to applicable "P3" Freightliner Cascadia vehicles.

For context, NHTSA states in its August 31, 2020 Opening Resume that “ODI became concerned” that the new replacement shield introduced with technical service bulletin (“TSB”) 54-312 “was intended to correct a problem with the shield installed as a remedy for recall 09V-024 and all new production trucks since the [Recall 09V-024] was announced.” As further stated in the Opening Resume, TSB 54-312 instructed “technicians to replace the drip shield and the secondary cover on the SAM Cab module with a one-piece drip shield.” Consequently, ODI opened the RQ “to understand the failure modes that allow water intrusion into the SAM Cab module, the effectiveness of original recall remedy, and the installation of an updated drip-shield as it relates to continual water intrusion.”

With this context, the SAM Cab, which was addressed in Freightliner Service Bulletin (TSB) 54-312 (dated July 30, 2019), was only used in the earlier version of Cascadia that DTNA calls the “P3.” DTNA ceased production of the P3 at the end of model year 2020. In 2017, DTNA released the “New Cascadia,” which DTNA refers to as the “P4.” The P4 has a single, different SAM, located in a different position (an electrical vault in a protected location inside the cab), and it is not used with a drip shield. Accordingly, DTNA’s responses to the IR reasonably only include data pertaining to P3 SAM Cab modules.

C. DTNA respectfully objects to the definition of “Alleged defect” to the extent it may be inconsistent with, and/or different from, NHTSA’s August 31, 2020 Opening Resume for RQ20-0001. The definition of “Alleged defect” states: “Water intrusion into the SAM cab module.” NHTSA’s Opening Resume states at the “Problem Description:” “Water intrusion into the SAM cab module resulting in the loss of electrical functions and potential fire, increasing the risk of a crash and personal injury.”

D. DTNA respectfully objects to the definition of “DTNA” because it is unreasonably broad, vague, and/or ambiguous in the context of the information sought by this IR. Without waiving said objection, DTNA will respond to NHTSA’s requests using reasonable, good faith searches of responsive business records kept in the ordinary course of business at appropriate business locations.

E. DTNA reserves the right to interpose additional good faith objections, as appropriate.

### **III. Request for Confidential Treatment & Freedom of Information Act Protections**

Pursuant to 49 C.F.R. Part 512, DTNA is submitting a request for confidential treatment of confidential business information in conjunction with its response to NHTSA’s IR.

Additionally, DTNA believes NHTSA’s policy is to protect the privacy of individuals under Exemption 6 of the Freedom of Information Act, 5 U.S.C. 552(b)(6), and applicable law and guidance thereunder. To the extent information is provided to NHTSA that contains the name,

address, and other personal information of owners or other individuals, including DTNA personnel, or otherwise, that information should not be made available to the public. We respectfully believe NHTSA should not make public any such private information.

**IV. Specific Responses**

- 1. State, by model and model year, the number of subject vehicles DTNA has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by DTNA, 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. Windshield part number and design version installed as original equipment;**
  - g. Date of manufacture;**
  - h. Date of subject component manufacture; and**
  - i. Date warranty coverage commenced;**

**Provide the table in Microsoft Access 2010, or a compatible format, entitled “PRODUCTION DATA.” A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.**

Response to Request 1

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

The source of this information is our production database. It is current as of October 13, 2020.

Table 1 set forth below provides the number of subject vehicles DTNA has manufactured for sale or lease in the United States.

**Table 1**

<b>Model Year</b>	<b>P3 Cascadia – SAM Cab</b>
2007	3
2008	2678
2009	13141
2010	15444
2011	24308
2012	48511

2013	45137
2014	50653
2015	63154
2016	80161
2017	47514
2018	36015
2019	17930
2020	9486
2021	0

[

]

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. Property damage claims; and**
  - f. Third-party arbitration proceedings where DTNA is or was a party to the arbitration; and**
  - g. Lawsuits, both pending and closed, in which DTNA 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 DTNA’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 2

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

The source of this information is our remedy database (current as of November 11, 2020) and legal database (current as of November 11, 2020).

Table 2 below contains the total number of each item set forth in subparts (a) through (g), received by DTNA, or of which DTNA is otherwise aware, which relate to, or may relate to the alleged defect in the subject vehicles. Please note that the number of reports involving an alleged fire at subpart (d) is drawn from information being reported in other subparts, and is therefore not added to the “total number of reports” below.

**Table 2**

Category	Number of Reports
a. <i>Consumer complaints</i>	73
b. <i>Field reports</i>	64
c. <i>Reports involving a crash, injury, or fatality;</i>	0
d. <i>Reports involving a fire;</i>	65
e. <i>Property damage claims;</i>	2
f. <i>Third-party arbitration proceedings</i>	0
g. <i>Lawsuits</i>	0

[

]

As to the requested information for subparts (e) through (g) in the last paragraph of Request No. 2, the subfolder titled “PROPERTY DAMAGE CLAIMS” in Response Folder “RESPONSE-Q2-4” at Bates Nos. DTNA-RQ20-001-000157 and DTNA-RQ20-001-000443 contains information about the parties to two property damage claims. Please note that, because one of the property damage claims also constitutes a field report, DTNA added duplicates of this document in the subfolders “PROPERTY DAMAGE CLAIMS” and “FIELD REPORTS” in Response Folder “RESPONSE-Q2-4.”

**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.);**
- 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. Subject component's serial number;**
- h. Windshield serial number and design version**
- i. Incident date;**
- j. Report or claim date;**
- k. Whether a crash is alleged;**
- l. Whether a fire is alleged;**
- m. Whether property damage is alleged;**
- n. Number of alleged injuries, if any; and**
- o. Number of alleged fatalities, if any.**

**Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.**

Response to Request 3

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

The source of this information is our remedy database (current as of November 11, 2020) and legal database (current as of November 11, 2020).

[

]

- 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 4

The source of this information is our remedy database (current as of November 11, 2020) and legal database (current as of November 11, 2020).

The search methods and search criteria consisted of the NHTSA definitions of “Subject vehicle(s),” “Subject component(s),” and “Alleged defect,” as those definitions appear in the Information Request. Specific search methods and search criteria are described below.

DTNA Field Service, Customer Assistance Center (“CAC”), and Legal systems were searched for reports on the subject vehicles that included the word “SAM” in the issues field. The reports were manually reviewed and reports which relate to or may relate to the alleged defect are included. Whenever possible, attachments to documents have similar titles to the report to ensure the relationship is maintained.

#### Consumer Complaints

The subfolder titled “CONSUMER-COMPLAINTS” in Response Folder “RESPONSE-Q2-4” at Bates Nos. DTNA-RQ20-001-000001 through DTNA-RQ20-001-000156 contains copies of consumer complaints that relate or may related to the alleged defect in the subject vehicles. The consumer complaints are organized by ascending serial number.

#### Field Reports

The subfolder titled “FIELD REPORTS” in Response Folder “RESPONSE-Q2-4” at Bates Nos. DTNA-RQ20-001-000157 through DTNA-RQ20-001-000442 and DTNA-RQ20-001-000584 through DTNA-RQ20-001-000598 contains copies of the requested information that relate or may related to the alleged defect in the subject vehicles. The subfolder contains what DTNA calls “field service reports,” and “incident reports,” which are both prepared by district service managers at DTNA. DTNA prepares “field service reports” for any type of failure. In contrast, DTNA prepares “incident reports” for property damage claims, thermal events and personal injuries. The attachment also contains three e-mails that constitute field reports within the meaning of 49 C.F.R. Part 579. One of these emails also constitutes a property damage claim within the meaning of 49 C.F.R. Part 579.

Within the time allowed, DTNA was not able to locate copies within its custody and control and in the ordinary course of business of the following field reports, identified with their DTNA file number – (i) 2010-00582, (ii) 2010-00285, (iii) 2008-00257, (iv) 2014-00621 and (v) 2014-00275. DTNA will supplement its response to this request as appropriate.

## Reports involving a Fire

The subfolder titled “THERMAL EVENT REPORTS” in Response Folder “RESPONSE-Q2-4” contains copies of the requested information that relate or may related to the alleged defect in the subject vehicles.

For NHTSA’s convenience, and to avoid potential confusion, DTNA is including in this Response Folder duplicate copies of materials already being provided in response to other IR question subparts, which bear the same Bates numbers as those materials are being produced to the agency in response to other applicable IR question subparts.

## Property Damage Claims

The subfolder titled “PROPERTY DAMAGE CLAIM” in Response Folder “RESPONSE-Q2-4” at DTNA-RQ20-001-000157 and DTNA-RQ20-001-000443 contains a copy of two property damage claims that relate or may related to the alleged defect in the subject vehicles. One of these property damage claims also constitutes a field report within the meaning of 49 C.F.R. Part 579.

The search did not identify any reports involving a crash, injury or fatality, third-party arbitration proceedings or lawsuits.

- 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.**

**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. Vehicle's Time in Service at time of repair;**
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;**
- h. Labor operation number(s);**
- i. Problem code(s);**
- j. Diagnostic trouble code(s);**
- k. Replacement part number(s) and description(s);**
- 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." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.**

## Response to Request 5

### **CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

The source of this information is our warranty database and is current as of November 11, 2020.

Table 3 set forth below provides a total count for all the categories of claims that have been paid by DTNA to date that relate to, or may relate to, the alleged defect in the subject vehicles. Specifically, Table 3 identifies the claims with the following categories:

- "EXTENDED" refers to extended warranties.
- "POLICY" are claims not covered by DTNA's warranty or extended warranty programs, but are paid to promote customer good will per the decision of a DTNA Service Manager.
- "REPLACEMENT\_PARTS" are claims against warranted service parts installed at a DTNA service location, both parts and labor 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.
- "WARRANTY" are warranties.
- "WCP\_POLICY" is a retired program named Warranty Certification Program where individual dealers were allowed to make limited decisions to pay policy claims for out-of-warranty vehicles on their own approval.
- "MISC\_REPLACEMENT PART" are claims against warranted service parts not installed at a DTNA service location, only parts are covered.

- “USED\_PRODUCT\_WARRANTY” covers claims against vehicles registered and certified as used vehicles sold under used vehicle sales.

[

]

[

]

[

]

- 6. 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, 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.**

Response to Request 6

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

The source of this information is our warranty claims database and is current as of November 11, 2020.

[

]

[

]

[

]

[

]

[

]

[

]

- 7. 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 7

The source of this information is our warranty department and is current as of November 11, 2020.

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 gross combined weight (“GCW”) of 92,000 lb. and 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 do not 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 Coverage Document provided at the delivery of every new Freightliner.

Further, extended warranty coverages and prices are negotiated for at the time of purchase if the customer is desirous of such an option. Table 6 contains, by option, model, and model year, the number of subject vehicles that are covered under each extended warranty option.

**Table 6**

Extended Warranty Option	08	09	10	11	12	13	14	15	16	17	18	19	20	Total
EXT CAB/HOOD	237	2081	4185	6055	3101	3489	2954	2549	3246	2064	1226	161		31348
EXT CHOICE EXTENDED COVERAGE							11	343	10307	4959	2878	309	120	18927
EXT TRUCK COVERAGE 3									69	189	209	29	26	522
EXT TRUCK COVERAGE 4						1	4	8	4594	6429	5628	2606	1026	20296
EXT WIRING COMPLETE	143	880	1502	5138	1588	2292	483	784	1612	918	411	172	92	16015
EXTENDED BASIC VEHICLE				2	72	1177	14473	15312	6913	1990				39939
EXTENDED BASIC VEHICLE WITHOUT PARKSMART						6	701	5992	5363	2808	1972			16842
Grand Total	380	2961	5687	11195	4761	6965	18626	24988	32104	19357	12324	3277	1264	143889

- 8. 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 8

The source of this information is our service department, engineering and district service managers and is current as of November 11, 2020.

As set forth at Table 7, DTNA has identified items relating to communications that relate to, or may relate to, the alleged defect in the subject vehicles and that DTNA issued to the external entities identified in Request No. 8. Table 7 identifies each of these communications and their attachments with a brief description, submission type and the publication date of the communication.

**Table 7**

File	Description	Submission Type	Publication Date
------	-------------	-----------------	------------------

TSN+60-07_Cab+Leak+Testing (FSPR 15788)	Cab Leak Testing	Technical Service Note	Unknown
TSN 60-04 Cab Leaks and Water Intrusion into SAM Modules	Cab Leaks and Water Intrusion into SAM Modules	Technical Service Note	Unknown
SS 3499	Cascadia Frontwall Leaks	Service Solution	Jan 30, 2009
SS 3499 Attachment 1441_FRONTWALL LEAKS_Service Solution_rev1	Front Wall Leaks	Attachment	Jan 30, 2009
SS 3498	Cascadia Root Leaks	Service Solution	Jan 30, 2009
SS 3498 Attachment Roof Leaks	Roof Leaks	Attachment	Jan 30, 2009
SS 3497	Cascadia Windshield Leaks	Service Solution	Jan 30, 2009
SS 3497 Attachment_WINDSHIELD LEAKS	Windshield Leaks	Attachment	Jan 30, 2009
SS 3495	Cascadia Cab Leak Source Identification	Service Solution	Jan 29, 2009
SS 3495 Attachment 1464_LOCATING LEAKS IN FRONT OF CAB_Service Solution_rev2	Locating Leaks in front of Cab	Attachment	Jan 29, 2009
SS 3495 Attachment 1446_INDICATIONS OF WATER INTRUSION WHICH COULD AFFECT THE SAMS_Service Solution_rev1	Indications of Water intrusion which could affect SAMs	Attachment	Jan 29, 2009
SB 54-312	Cabin Drip Shield Enhancement	Service Bulletin	July 30, 2019
SB 54-231	Replacing SAM Cab and SAM Chassis Hardware Assemblies	Service Bulletin	May 1, 2019
FL545 (Revised) Cascadia Cab and Chassis SAMs	Cascadia Cab and Chassis SAMs	Recall Documentation	Mar 2009
Cascadia Workshop Manual 60.05.100	Cab Water-Leak Detection and Repair	Workshop Manual	Unknown
SB 60-144	New Cascadia Windshield Seal, Adhesive, and Preparation	Service Bulletin	Aug 1, 2014

The subfolder titled “COMMUNICATIONS” in Response Folder “RESPONSE-Q8” at Bates Nos. DTNA-RQ20-001-000467 through DTNA-RQ20-001-000521 contains copies of the requested information that relate or may related to the alleged defect in the subject vehicles.

DTNA does not have plans to communicate any service, warranty, or other documentation relating to SAM Cab within the next 120 days.

- 9. 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.

Response to Request 9

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

The source of this information is product validation engineering, manufacturing engineering and compliance documents and is current as of November 11, 2020.

Table 8 contains the requested information in subparts (a) through (f) for all actions, as defined in Request No. 9, that relate to, or may relate to, the alleged defect in the subject vehicles.

**Table 8**

[



[

]

- 10. 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 components, 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 10

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

The source of this information is our engineering department and is current as of November 11, 2020.

DTNA does not control parts by revision level, but by part number. If a revision will affect the form, fit or function, a new part number is assigned and all new part and related parts go into production on a date when production quantities of all parts are available both to the plants and to the DTNA Service Organization.

[

]

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

**a. 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 11

In view of the Covid-19 pandemic, and per Mr. Robert Nguyen's request and as set forth in an e-mail exchange between DTNA and NHTSA on October 29, 2020, DTNA shipped the requested kits with FedEx Ground to the home address of Mr. Robert Nguyen, at the address he has provided to DTNA, on November 16, 2020. The FedEx tracking number for the shipment is 931789136550.

**12. 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. Subject component;**

**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 12

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

The source of this information is our purchasing/after-market sales database and is current as of November 11, 2020.

Attachment “Aftermarket and Production Sales” in Response Folder “RESPONSE-Q12” at Bates No. DTNA-RQ20-001-000579 contains the number of each subparts (a) and (b) that DTNA has sold that may be used in the subject vehicles.

[

]

DTNA is not aware of any other vehicles that contain the identical component, because the items identified in subparts (a) and (b) are unique to P3 Cascadia (MY2007-2020).

- 13. 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. 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 13

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

[

]

*[Signature appears on next page]*

Sincerely,



---

Larissa Stoffels  
Executive Manager, Vehicle Safety  
Compliance and Regulatory Affairs  
Daimler Trucks North America LLC

Attachments:

- Certificate of Corporate Responsibility Required by 49 U.S.C. 30166(o)
- Other attachments as stated

**Certificate of Corporate Responsibility for Reports**

I, Larissa Stoffels, pursuant to 49 U.S.C. 30166(o), state as follows:

1. I am the Executive Manager of Vehicle Safety, Compliance and Regulatory Affairs, Daimler Trucks North America LC (“DTNA”), and I am authorized by DTNA to execute this certificate on its behalf.
2. I have reviewed the foregoing submission and, based on my knowledge, the submission does not contain any untrue statement of a material fact; or omit to state a material fact necessary in order to make the statements made not misleading, in light of the circumstances under which such statements were made.
3. I directed a good faith inquiry be conducted that would be reasonably calculated to assure that DTNA’s responses are complete and correct, and that documents within the possession, custody and control of DTNA be searched diligently for information responsive to the Information Request to be produced to NHTSA.
4. Based on information provided to me, inquiry has been made of the persons and offices reasonably calculated to have responsive information and documents, and the answers to the Information Request are correct based upon DTNA’s investigation to date.
5. DTNA’s review is ongoing, and DTNA reserves the right to supplement or clarify these responses if appropriate to do so.
6. I certify under penalty of perjury that the foregoing is true and correct.

Executed this 19<sup>th</sup> day of November, 2020.



Larissa Stoffels  
Executive Manager, Vehicle Safety  
Compliance and Regulatory Affairs  
Daimler Trucks North America LLC