

Daimler Truck North America LLC
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VIA ELECTRONIC SUBMISSION ONLY

Tanya Topka, Director
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Subject: Daimler Truck North America LLC's Partial Response to NHTSA's Information Request in EA25006

Enclosed is Daimler Truck North America LLC's ("DTNA") partial response to the National Highway Traffic Safety Administration's ("NHTSA") Office of Defects Investigation ("ODI") April 27, 2026 Information Request ("IR") in connection with the agency's Engineering Analysis ("EA") (EA25006).

This investigation involves allegations of false positive activation of Automatic Emergency Braking ("AEB") in certain model year ("MY") 2017-2022 Freightliner and Western Star vehicles manufactured by DTNA. The agency stated in the IR that it has received 32 reports that "indicate the subject vehicles will apply the service brakes without input from the driver and with no imminent collision hazard present resulting in a sudden decrease in speed. The report numbers will be provided to you for review."

DTNA's response to this IR was prepared pursuant to a diligent search for the requested information. DTNA has employed its best efforts to provide responsive information. We would be pleased to meet with agency personnel to discuss any aspect of this IR response.

I. General Responses

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II. General Objections

III. Specific Responses

Request No. 1, Production Data

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 (17-character VIN);*
- b. Make;*
- c. Model;*
- d. Model Year;*
- e. Subject system part number and design version installed as original equipment;*
 - 1. Software version(s);*
 - 2. Hardware version(s);*
- f. Date of manufacture (MM/DD/YYYY);*
- g. Date warranty coverage commenced (MM/DD/YYYY); and*
- h. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation).*

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

Response to Request No. 1

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Request No. 2, Counts of Complaints, Reports, Claims, and Legal Proceedings

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 subject vehicles operators;***
- b. Field reports, including dealer field reports;***
- c. Reports involving a crash, injury or fatality;***
- d. Property damage claims; and***
- e. Third-party arbitration or mediation proceedings, both pending and closed, where DTNA is or was a party to the arbitration; and***
- f. Lawsuits, both pending and closed, in which DTNA is or was a defendant or codefendant.***

Multiple incidents involving the same vehicle are to be counted separately. For items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and DTNA's assessment, with a summary of the significant underlying facts and evidence.

Response to Request No. 2

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Request No. 3, Itemized Incident Data, "REQUEST NUMBER TWO DATA"

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;*
- b. Category of the item (as identified in Request No. 2);*
- c. Vehicle owner or subject vehicles name (and subject vehicles contact person), email address and telephone number;*
- d. Vehicle owner or subject vehicles street address, city, state (postal abbreviation), and ZIP code;*
- e. Vehicle's 17-character VIN;*
- f. Vehicle's make, model and model year;*
- g. Vehicle's mileage at time of incident (numeric data type);*
- h. Incident date (MM/DD/YYYY);*
- i. Incident details (location/GPS, posted speed limit, roadway type, roadway features, roadway obstructions, traffic conditions);*
- j. Whether DTNA or any affiliated party inspected the vehicle;*
- k. Whether DTNA or any affiliated party obtained data from the vehicle;*
- l. Method for obtaining vehicle data (e.g., telematics);*
- m. Details of stored braking event(s) closest to the incident by date and mileage (including 11 sub-elements);*
- n. Whether DTNA confirmed and/or duplicated the alleged condition;*
- o. Report or claim date (MM/DD/YYYY);*
- p. Whether a crash is alleged;*
- q. Whether property damage is alleged;*
- r. Number of alleged injuries, if any; and*
- s. Number of alleged fatalities, if any.*

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

Response to Request No. 3

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Request No. 4, Data Logs, Supporting Documents, and Search Methods

Produce copies of all data logs of braking events stored in any onboard vehicle system (including an electronic data recorder, control module, other computer module, etc.) and/or captured via telematics related to each item within the scope of Request No. 2.

Additionally 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

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Request No. 5, Warranty and Claims Data

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 subject vehicles name (and subject vehicles contact person), email address and telephone number;*
- c. Vehicle owner or subject vehicles street address, city, state (postal abbreviation), and ZIP code;*
- d. 17-character VIN;*
- e. Repair date (MM/DD/YYYY);*
- f. Vehicle mileage at time of repair (numeric data type);*
- 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;*
- p. Details of stored braking event(s) closest to each incident alleged by the claimant by date and mileage (including 11 sub-elements).*
 - 1. Whether the stored event was assessed to correspond to any alleged incident;*
 - 2. Event date and time (specify date and time formats);*
 - 3. Event mileage;*
 - 4. Event key cycle;*
 - 5. Speed of travel at event onset;*
 - 6. Speed of travel at event conclusion;*
 - 7. The duration of braking commanded by the vehicle;*
 - 8. The maximum braking deceleration commanded by the vehicle;*
 - 9. Whether the subject system initiated braking;*
 - 10. If so, the braking response level of the subject system (i.e. optical/acoustic warning, partial braking, full braking)*
 - 11. If not initiated by the subject system, the name of the system that commanded braking.*

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

Response to Request No. 5

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Request No. 6, Search Methods and Criteria for Warranty Data

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.

Response to Request No. 6

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Request No. 7, Labor Operations, Problem Codes, and Diagnostic Trouble Codes

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.

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Response to Request No. 7

Request No. 8, Warranty Coverage Terms

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.

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Response to Request No. 8

DTNA submits this partial response in good faith pursuant to 49 U.S.C. § 30166 and will continue to cooperate with ODI's investigation. Questions regarding this response may be directed to the undersigned.

Respectfully submitted,

Sam Geser

Product Compliance

Compliance and Regulatory Affairs

Daimler Truck North America LLC

4747 N. Channel Ave., Portland, OR 97217