

CERTIFIED MAIL - RETURN RECEIPT

December 10, 2004

Associated Administrator for Safety Assurance (NSA - 01)
National Highway Traffic Safety Administration
400 7th St. SW
Washington, DC 20590

Dear Sir:

This is a Non-Compliance Information Report pursuant to Federal Motor Vehicle Safety Standard, 4 CFR Part 573.5 (C). This report is submitted by Hehr International Inc. as supplier of the non-complying parts. All parts were sold to one vehicle manufacturer.

DaimlerChrysler Commercial Buses NC
(Formerly Thomas-Dennis Co. LLC, NC
6012 High Point Rd.
Greensboro, NC 27407

These buses are the SLF Model Series.

The vehicles, which contain the non-compliant parts, are buses produced from 2002 to present. Seating capacities range from 24-38 passengers.

The non-compliance is believed to exist in approximately 4000 vehicles. (The exact number of vehicles and the percentage of DaimlerChrysler production is not known at present.)

The nature of the non-compliance is that emergency exit windows (our model numbers 1401 & 1407) may not meet emergency exit release requirements as specified in FMVSS 571.217 S.5. This condition was discovered by Lextrans, Lexington, KY during a normal operator exit window check, when a window failed to open when unlatched. DaimlerChrysler verified that the latch wear problem was exhibited in several vehicles. Whereupon, Hehr was notified and the present recall initiated on December 7, 2004.

In coordination with DaimlerChrysler, Hehr International will undertake to remedy this non-compliance in accordance with 49 CFR 579.

Steps in this remedy are:

- 1) DaimlerChrysler will provide to Hehr International in a list of current vehicle owners, their addresses and Vehicle Identification Numbers. Hehr will contact these owners by first class mail, announcing the recall, and informing them of arrangements to be made to effect the remedy.
- 2) Proposed procedures for the remedy:
 - A) Owner to verify possession of the bus, its VIN and the number of emergency exit windows mounted in the bus. Owner will respond back to Hehr using a self addressed, stamped envelope provided.
 - B) Hehr International Inc. will ship repair parts and installation instructions back to the responding bus owners. At present, repair parts are expected to be two metal spacers per window which, placed according to instructions will render the window compliant to 49 CFR 571.217 S5.
 - C) Upon receipt of repair parts, bus owners are to install them in each window, and to submit to Hehr an invoice for installation labor. At present, we believe these repairs can be accomplished in .5 hours and will reimburse up to that labor time at a labor rate not more than \$100 per hour.

As soon as additional details regarding this recall become available (Such as number of vehicles, number of windows, etc.) They will be mailed to you as will sample letters to be sent to owners / operators of the buses in question. This is in order to comply with 49 CFR 573.5 (C) (9). In addition to the foregoing, we request that all pertinent correspondence relating to this recall be sent directly to Hehr International Inc., since we are assuming responsibility for this recall.

Very truly yours,



Tom McDonald
Vice President, Sales & Marketing

copies: C. Penner, Hehr-Kansas
J. Kittle, DaimlerChrysler

Via Fax:
Jon White
Chief Defects & Recall Information Analysis Div.
202-366-7882