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August 5, 2004

Kenneth N. Weinstein  
Associate Administrator for Safety Assurance (NSA-01)  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

**Re: Defect Information Report FL-429 Thomas School Bus Structure**

Mr. Weinstein:

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Freightliner LLC herewith reports a safety campaign to recall approximately 2,125 Thomas Built Saf-T-Liner MVP ER buses manufactured in 1995 and 1996 for South Carolina that may develop cracks in the roof rafters near the window header welds.

Attached is Freightliner's Defect Information Report.

Please contact me if you have any questions.

Sincerely yours,

Timothy Blubaugh

Cc: Michael Mason, CAL-OSHA  
DOSH, Legal Unit  
10th Floor  
455 Golden Gate Avenue  
San Francisco, CA 94102

Enclosure

**Certified Mail Article Number:**

**7002 3150 0004 1405 1119**

**Defect Information Report**  
(Section 573.6)

August 5, 2004

(c)(1) **Manufacturer:** Thomas Built Buses  
P.O. Box 2450  
High Point NC  
(336) 841-5924

(c)(2) **Vehicles identification:**  
**Model(s) affected:** Saf-T-Liner MVP-ER  
**Manufacture Dates:** January 1995 to February 1996  
**Basis for determining population:** Buses manufactured with special galvanized steel framing structure and with exit doors on both sides that were sold to South Carolina.  
**Component manufacturer if other than the vehicle manufacturer:** not applicable

(c)(3) **Total number of vehicles potentially affected:** 2125

(c)(4) **Percentage of vehicles estimated to contain the defect:** approximately 33%

(c)(5) **Description of the defect:** Some school buses operated in South Carolina on predominately unimproved roads may develop cracks in the bus body framing structure members ("rafters") near horizontal window header welds and at side exit door frames. These buses were manufactured with special galvanized steel and two opposing side emergency exit doors.

(c)(6) **Chronology of principal events:** South Carolina notified Thomas Built that some buses were exhibiting cracks in the rafters near the window header welds and at side exit door frames. Two buses were analyzed at Thomas Built's test engineering facility. Some of the rafters that cracked through at the top, then apparently later cracked at the bottom of the window. Thomas reviewed the buses and determined a field inspection should take place to examine additional buses in service. The inspection showed that buses exhibiting rafter cracking were operating in southern South Carolina on unimproved roads. These buses were also configured with emergency doors on each side, separated by one body section, and were manufactured with a special high-zinc galvanized steel. Strength of the steel near the welds may be affected by additional heat used to weld the material and higher zinc concentrations in the weld area.

(c)(7) **Noncompliance-test or other data:** not applicable

(c)(8) **Remedial program:** All potentially affected buses will be inspected and any rafter found to have a crack will be repaired by addition of a reinforcement. Buses without cracks will be inspected on an annual basis and will be repaired if necessary.

**Estimated Owner Notification Date:** Thomas Built Buses has been working with the owner to develop a plan for inspection and modifications to repair the affected buses.

**Reimbursement Plan:** Thomas Built Buses has covered expenses for prior repairs.

(c)(9) **Communications sent to dealers and owners:** Copies will be submitted as a supplemental report when available.

(c)(10) **Copy of proposed owner notification letter:** A draft will be sent for ODI review when available.

(c)(11) **Manufacturer's campaign number:** FL-429