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FIVE DEFECTS IDENTIFIED

Timothy A. Blubaugh
Director
Government Technical Affairs

Freightliner LLC
4747 N. Channel Avenue
Portland, OR 97217-7699
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503.745.6800 Facsimile
TimothyBlubaugh@Freightliner.com

March 24, 2005

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-440, Michelin 10R22.5 XDE tires

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 302 Freightliner, Sterling, Freightliner Custom Chassis, and Thomas Built Bus vehicles manufactured May 3, 2004 to December 19, 2004 with a defect in Michelin 10R22.5 XDE tires

Attached are Freightliner's Defect Information Report and Michelin's Defect Information Report. Reference NHTSA number 04T-023

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:

7003 2260 0001 3403 5985



A DaimlerChrysler Company

Defect Information Report

(Section 573.6)

March 24, 2005

(c)(1) Manufacturer: Freightliner LLC
P.O. BOX 3849
Portland, Oregon 97208
(503) 745-5219

Brands: Freightliner, Sterling, Freightliner Custom Chassis, Thomas Built Bus

(c)(2) Vehicles identification:

Model(s) affected: Freightliner Business Class M2
Sterling Acterra
Freightliner Custom Chassis MT-55 van chassis
Thomas Built Bus C2 school bus, FS-65 school bus, MVP-EF

Manufacture Dates: Vehicles manufactured May 3, 2004 to December 19, 2004

Basis for determining population: Vehicles manufactured with Michelin 10R22.5 tires identified in the attached Michelin Defect Information Report

Component manufacturer if other than the vehicle manufacturer:

Michelin North America, Inc.
One Parkway South
P.O. Box 19001
Greenville, South Carolina 29602-9001
Phone: 864/458-5041

(c)(3) Total number of vehicles potentially affected: 302 vehicles

(c)(4) Percentage of vehicles estimated to contain the defect: See attached Michelin Defect Information Report

(c)(5) Description of the defect: See attached Michelin Defect Information Report Reference NHTSA number 04T-023

(c)(6) Chronology of principal events: Freightliner received Michelin's customer notification in December 2004. Freightliner contacted the manufacturing plants and Michelin replaced the subject tires on vehicles still in the plants. Freightliner supplied a list of delivered vehicles with customer information to Michelin in January 2005. Michelin will notify customers and administer this recall campaign.

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

(c)(8) Remedial program: Michelin will notify customers and provide replacement tires. See defect report from Michelin. Freightliner production records have been used to identify vehicles manufactured with the subject tires.

Estimated Owner Notification Date: Customers will be notified by Michelin. See defect report from Michelin.

Reimbursement Plan: All prior repairs would have been covered by Michelin's warranty.

(c) (9) Communications sent to dealers and owners: Customers will be notified by Michelin. See defect report from Michelin.

(c) (10) Copy of proposed owner notification letter: Customers will be notified by Michelin. See defect report from Michelin.

(c) (11) Manufacturer's campaign number: FL-440



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DEFECTS INVESTIGATION

04T-023

3275

December 17, 2004

Kenneth N. Weinstein
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Re: Part 573 Defect Information Report

Dear Mr. Weinstein;

Pursuant to the requirements of 49 C.F.R. Part 573, we are submitting the following report related to certain tires manufactured under Federal Motor Vehicle Safety Standards (FMVSS) No. 119 (New Pneumatic Tires for Vehicles Other Than Passenger Cars).

Pursuant to 49 C.F.R. § 573 Michelin North America, Inc. (MNA) reports the following:

573.6(c)(1) Name of Manufacturer:

Michelin Tyre Public Limited Company

573.6(c)(2)(iii) Items Potentially Containing the Defect:

Michelin XDE tires, size 10R22.5 LRG and LRF, that were periodically manufactured at the Ballymena, Northern Ireland plant during DOT weeks 21 through 43 in 2004 (beginning the week of May 23 and ending the week of October 24).

573.6(c)(3) Total Number of Tires Potentially Containing the Defect:

We believe that there are fewer than 4,000 potentially affected Subject Tires.

Michelin North America, Inc.

Industry Standards & Government Regulations
515 Michelin Road
Post Office Box 1987
Greenville, SC 29602-1987

573.6 (c)(4) Percentage of Tires Estimated to Actually Contain the Defect:

We believe that up to 100% of the Subject Tires described above could contain the defect.

573.6(c)(5) Description of the Defect

A localized variance in the gauge of the inner liner, which could potentially result in a rapid loss of air pressure.

573.6(c)(6) Basis For Determination of Defect:

A routine quality check of a single Subject Tire in late October 2004 alerted the quality system to a potential issue. A detailed and thorough investigation was immediately undertaken, resulting in a decision to conduct this voluntary recall

MNA is unaware of any incidents of product failure in the field, or any injuries or property damage related to this condition in the Subject Tire. The Subject Tire is used in dual-tire, drive-axle applications.

573.6(c)(8) Remedy Program:

MNA will initiate a voluntary safety recall for all Subject Tires. The U.S. customers/consumers that may have purchased tires containing the condition described above will be contacted by first class mail beginning the week of December 27, 2004. This correspondence will explain the issue and include specific instructions as to how to obtain replacement tires without charge, as well as procedures for collecting reimbursement for remedies made prior to the recall, where appropriate.

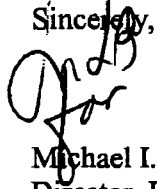
573.6(c)(9) Disposition of Recalled Tires

In accordance with the provisions of 49 CFR § 573.6(c)(9)(i-iii), MNA will make its dealers aware of the new dealer requirements that became effective in connection with the disposition of recalled tires, for the recall of the Subject Tires in a dealer notification that will be submitted to the agency separately pursuant to 49 CFR § 573.6(c)(10). The program for disposing of recalled tires returned to MNA will comply with applicable state and local law regarding the disposal of tires, and to the extent possible, will be channeled into a category of positive reuse or beneficial non-vehicular use.

573.6(c)(11) Owner Notification

A draft of MNA's owner notification letter is enclosed, for which we ask the Agency's prompt approval.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Wischhusen", written over the word "Sincerely,".

Michael I. Wischhusen
Director, Industry Standards &
Government Regulations
Michelin North America, Inc.
Ph. 864-422-4220