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December 21, 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

05V-001
(7 pages)

Re: Defect Information Report FL-438 Gra-Mag Seats

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 1,770 Freightliner Columbia truck-tractors with seats manufactured by Gra-Mag from August 2002 through September 2004. Reference Gra-Mag safety recall 04E-065

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 0945



A DaimlerChrysler Company

Defect Information Report (Section 573.6)

December 21, 2004

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

Brands: Freightliner

(c)(2) Vehicles identification:

Model(s) affected: Columbia

Manufacture Dates: August 2002 through September 2004

Basis for determining population: Trucks manufactured with seats identified in GRA-MAG Part 573 Defect Information Report – reference NHTSA 04E-065

Component manufacturer if other than the vehicle manufacturer:

Gra-Mag Truck Interior Systems, LLC
39600 Lewis Drive
Novi, MI 48377
Michel Senerius 248/567-4000

(c)(3) Total number of vehicles potentially affected: 1,770

(c)(4) Percentage of vehicles estimated to contain the defect: see attached DIR from Gra-Mag

(c)(5) Description of the defect: see attached DIR from Gra-Mag

(c)(6) Chronology of principal events: see attached DIR from Gra-Mag. Freightliner became aware of the defect from communications with the customer and Gra-Mag in November 2004. Gra-Mag has initiated a repair plan with the customer.

(c)(7) Noncompliance-test or other data: see attached DIR from Gra-Mag

(c)(8) Remedial program: Repairs will be performed by Freightliner dealerships and Direct Warranty customers, i.e., customers approved by Freightliner to do their own warranty repairs.

Estimated Owner Notification Date: Customer notification will be by first class mail using Freightliner records to determine the customers affected. This will be completed approximately February 15, 2004

Reimbursement Plan: All prior repairs have been completed under warranty. Gra-Mag has been working with the vehicle owner to make 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-438

GRA-MAG

truck interior systems

RECEIVED
NVS-215

GRA-MAG Truck Interior Systems, LLC
39600 Lewis Drive
Novi, MI 48377

2004 AUG 30 A 9 33

Phone: (248) 587-4808
Fax: (248) 587-5000

OFFICE OF
SAFETY INVESTIGATION
August 24, 2004

04E-065 (5095)

Associate Administrator for Defect Investigations
National Highway Traffic and Safety Administration
United States Department of Transportation
400 Seventh Street, SW
Washington, D.C. 20590

Re: 49 CFR Part 573 Defect and Non-compliance Report --
Gra-Mag Driver Air Suspension Seats

Ladies and Gentlemen:

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations on Defect and Non-compliance Reports, Gra-Mag Truck Interior Systems, LLC ("Gra-Mag") submits the following information concerning a safety related recall action Gra-Mag is initiating.

Date this report was prepared: August 24, 2004

1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as proscribed by 49 U.S.C. §30164.

Gra-Mag Truck Interior Systems, LLC
39600 Lewis Drive
Novi, Michigan 48377

The contact for purposes of this Notice is:

Michael Senerius, Vice President
Gra-Mag Truck Interiors Systems, LLC
39600 Lewis Drive
Novi, Michigan 48377
Phone: 248-567-4000
Fax: 248-567-5000

Signed: Michael Senerius
Michael Senerius, Vice President

Name and Title of Persons who prepared this report.

Mark P. Dunn, Legal Counsel Inland Automotive, Inc. Ph: 248-567-4621 Fax: 248-567-5002

Richard A. Wilhelm, Diekhson Wright PLLC. Ph: 313-223-3550 Fax: 313-223-3598

I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall

Generic name of the item: air suspension seat
Make: Gra-Mag
Model: Select Suspension Seat
Date of Manufacture: January 2001 through August 2004
Other Information : The pivot bolts are used in aftermarket seats supplied for use on heavy duty trucks

Generic name of the item: air suspension seat
Make: Gra-Mag
Model: Classic Suspension Seat
Date of Manufacture: January 2001 through August 2004
Other Information : The pivot bolts are used in aftermarket seats supplied for use on heavy duty trucks

Generic name of the item: air suspension seat
Make: Gra-Mag
Model: Standard Suspension Seat
Date of Manufacture: January 2001 through August 2004
Other Information : The pivot bolts are used in aftermarket seats supplied for use on heavy duty trucks

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents.

Select Suspension Seat: 100%
Classic Suspension Seat: 100%
Standard Suspension Seat: 100%

II. Identifying the Recall Population

3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.

The estimated number of seats to re-check for possible repair is 16,000.

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance:

100%

Identify and describe how the recall population was determined—in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:

The subject seat models incorporate frame assemblies designed and supplied by Grammer AS located in Turkey. Gra-Mag began receiving those seat frame assemblies in December 2000. All frame assemblies acquired between December 2000 and August 2004, incorporated the suspect attachment pivot bolts. Gra-Mag began using those frames in final seat assembly beginning in January 2001.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The pivot bolts are used to hold the inboard side of the seat back frame to the seat cushion frame. Over time, the pivot bolts can loosen and possibly fracture or dislodge, causing the seat back to fail to provide full support to the driver's back.

Describe the cause(s) of the defect or noncompliance condition.

The precise cause of the bolt loosening has not been determined. Testing is ongoing.

Describe the consequence(s) of the defect or noncompliance condition.

A loss of pivot bolt retention can cause the seat back to fail to provide full support of the driver's back.

Identify any warning which can (a) precede or (b) occur.

The driver may notice some looseness, chucking or shaking of the seat back relative to the seat cushion.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

**Grammer A.S.
PK 536
16043 Demetrias San Blvd.
Bursa, Turkey PK536**

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Peter Nagel, President of Management Board, Grammer AS

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

On July 29, 2004 Gra-Mag received notice from Mecca Electric, a truck dealership, that an inboard pivot bolt had fractured on one of its air suspension seats. Gra-Mag requested that the seat be returned to be evaluated.. Based on that review, it was determined that the pivot bolt had lost retention and had subsequently fractured. A subsequent review of Gra-Mag's warranty records revealed that it had received requests for replacement pivot bolts in nine other seats between April 2001 and July 2004. Gra-Mag has not received any reports of injuries associated with this condition. One seat which experienced a loss of pivot bolt retention was returned for analysis. The pivot bolt was evaluated for metallurgical content and strength. The review revealed that pivot bolt was of correct metal composition and was capable of withstanding 150 Nm without fracture. Grammer AS is currently conducting testing to determine the root cause of the loosening of the pivot bolt.

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

Gra-Mag has requested that Grammer evaluate the defect and recommend a remedy for correcting it.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

See Above

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

Gra-Mag halted final assembly of the air suspension seat models utilizing the pivot bolts until the appropriate fix can be determined.

VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Gra-Mag has ordered its warehouses to halt distribution of the suspect seats and to return all such seats currently in their inventory. Further, Gra-Mag sales agencies have been notified to inform their warehouse and dealer customers to halt further distribution and return all seats in their inventories.

Because Grammer AS has not determined the root cause of the loosening of the bolts and has not determined the appropriate remedy, a schedule for owner notification has not been determined. Owner notifications will be sent to owners through dealerships where possible and through OEM manufacturers where possible. However, a significant number of owners acquired their seats individually through aftermarket sales. Notification to those owners will be through dealer records, trade publications and the Gra-Mag web site.

VII. Furnish Recall Communications

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

No written communications have been generated yet.

Note: These documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.