

Associate Administrator for Enforcement,
National Highway Traffic Safety
Room 5326
400 Seventh Street S. W.
Washington, DC 20590
Fax to: Patricia Wallace (202) 366-7882
Number of pages including this one: 7

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(7 pages)

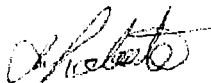
February 10, 2005

Subject: **PART 573—DEFECT AND NONCOMPLIANCE REPORTS**
Hehr Emergency Windows, installed in SLF buses

In accordance with 49 CFR Part 573.5 Daimler Chrysler Commercial Bus North America is submitting information regarding a potential defect that is currently under our investigation. The defect relates to the emergency window installed in, SLF transit busses manufactured in our Greensboro, North Carolina facility.

Should you have any questions or wish to discuss this matter further, please do not hesitate to contact me.

Sincerely,



Joe Labonte
Compliance and Safety Officer
Member of American Society of Safety Engineers

Joe.Labonte@DCBUSNA.com
(905) 403-7807
Fax: (905) 403-8808

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INVESTIGATION

Safety Defect and Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Report⁽¹⁾

On February 9, 2005, Hehr International Inc. [MFR] decided that (a defect which relates to motor vehicle safety exits in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: February 9, 2005

Furnish the manufacturer's identification code for this recall (if applicable):
NHTSA recall # 04E093

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 prescribed by 49 U.S.C. §30164.

DaimlerChrysler Commercial Buses North America
6012 High Point Road
Greensboro, North Carolina 27407

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Telephone Number: (336) 878-3816 **Fax No.:** (336) 878-3627

e-mail: bill.soderstrom@dcbusna.com

Name and Title of Person who prepared this report.

Bill Soderstrom
Manager Quality Assurance

Signed:

A handwritten signature in black ink, appearing to read "Bill Soderstrom", is written over a horizontal line.

I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, *for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment)*, provide:

Generic name of the item: Emergency Egress Windows

Make: Model: DaimlerChrysler SLF

Part Number: Size: 262 Vehicles effected

Function: Transportation

Other information which characterizes/distinguishes the items of equipment to be recalled: Vehicles produced between January 1, 2002 and September 1, 2004

Part Number: Size:

Function:

Other information which characterizes/distinguishes the items of equipment to be recalled:

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. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996, through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

II. Identifying the Recall Population

3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance. 262 Vehicles

Number of Items

Model Year Potentially Involved

Vehicles manufactured between January 1, 2002 and September 1, 2004

2002: 113 vehicles

2003: 117 vehicles

2004: 32 vehicles

Total Number Potentially Affected by the Recall: 262 Vehicles

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

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: Began using Model 1400 Hehr Emergency Egress windows starting January 1, 2002 and received upgraded windows in September 1, 2004

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.

This non-conformance relates to the emergency exit window release system. In some cases, the emergency exit striker plate can wear a groove onto the spring loaded pivoting release paws, causing them to fail to retract when the release handle is pulled. When this occurs, the emergency pane will not swing free unless pulled inward at the frame bottom, allowing the paw to clear the catch. Should this occur in a panic situation, egress could be slowed considerably or impeded altogether. This could trap passengers inside the bus, possibly leading to injury or death.

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

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093.

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

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093.

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

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093.

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

Hehr International Inc.

3333 Casitas Ave.

Los Angeles California, 90039

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

Terry Quinn Director of Marketing

Dave Utick Chief Executive Officer

IV. Provide the Chronology in Determining the Defect/Noncompliance

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

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093.

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

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093. DCCBNA is not administering a recall or completion reports for a recall. Hehr International Inc. is administering all matters regarding this recall.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E093. DCCBNA is not administering a recall or completion reports for a recall. Hehr International Inc. is administering all matters regarding this recall.

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

1. ¹Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5226 or by FAX at (202) 366-7882.

The Privacy Act of 1974 - Public Law 93-579, As Amended: *This information is requested pursuant to the authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response maybe used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administration enforcement or litigation against a manufacturer, your response, or statistical summary thereof, may be used in support of the agency's action.*