FREIGHTLINER® LLC
A DaimlerChrysler Company

Timothy A. Blubaugh
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Freightliner LLC
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Date: March 24, 2005

05V-137 (5 pgs.)

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-441

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 5,000 Thomas MVP-EF and ER buses, built 2001 – 2004, with a defect in the front axle assembly.

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:

7003 2260 0001 3403 5657

FREIGHTLINER® LLC

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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: Thomas Built Bus

(c)(2) Vehicles identification:

Model(s) affected: MVP-EF, ER Transit; MVP-ER, HD, HDX
Manufacture Dates: September 24, 2000 – March 4, 2004
Basis for determining population: See attached Dana pt573 Defect Information Report
Component manufacturer if other than the vehicle manufacturer:
Dana Corporation
Heavy Vehicle Technologies and Systems Group
P.O. Box 4097
Kalamazoo, MI 49003-4097
Phone: Michael Koralewski, Director – HVTSG North America
Telephone: 269-567-1268 Fax: 269-567-1268

(c)(3) Total number of vehicles potentially affected: Approximately 5000

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

(c)(5) Description of the defect: Thomas Built Bus purchased the complete axle, tie rod and brake assembly directly from Dana. Tie rod failures on these buses are exclusive to these particular Dana axles. See attached Defect Information Report from Dana.

(c)(6) Chronology of principal events: In June 2003 Thomas Bus reported a broken tie rod assembly to Dana. Thomas Bus and Dana have since worked to find a root cause and solution. The tie rod failure begins with a fracture close to the end, which progresses to a complete separation. See attached Defect Information Report from Dana.

(c)(7) Noncompliance-test or other data: Not Applicable

(c)(8) Remedial program: Based on the recommendation of Dana, Thomas Built Buses will replace the existing tie rod assembly with a more durable one having rolled threads and pierced slots. Thomas Built Buses will administer this campaign.

Estimated Owner Notification Date: Customer notification will be by first class mail using Thomas Bus records to determine the customers affected. This will be completed approximately April 15, 2005.

Reimbursement Plan: All prior repaired vehicles were covered by warranty or replaced by either Thomas Bus or the supplier.

(c) (9) Communications sent to dealers and owners: Copies will be submitted as a supplemental report when available. Thomas Built Buses will administer this recall campaign.

(c) (10) Copy of proposed owner notification letter: A draft will be sent to ODI review when available. Thomas Built Buses will administer this recall campaign.

(c) (11) Manufacturer's campaign number: FL-441

January 27, 2005

Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room 5321
Washington, DC 20590

Re: Part 573 Defect and Noncompliance Report

Dear Sir or Madam:

Dana Corporation, Heavy Vehicle Technologies and Systems Group, ("Dana") has determined that certain steer axle assemblies manufactured by Dana and sold exclusively as original equipment to Thomas Built Bus, may contain a defect related to motor vehicle safety with respect to certain Thomas Built Bus applications only. Dana has determined that the TRW tie rod assembly utilized by Dana in these steer axle assemblies may not be compatible with this particular vehicle application. There have been no reports of any accidents or injuries related to this defect.

The following information is submitted in accordance with 49 C.F.R. § 573.6.

(1) **Manufacturer:**
Dana Corporation
Heavy Vehicle Technologies and Systems Group
P.O. Box 4097
Kalamazoo, MI 49003-4097
Attn: Michael Koralewski, Director of Quality – HVTSG North America
Telephone: 269-567-1268 Fax: 269-567-1268

(2) **Product identification:**
The following Dana Steer Axle Assemblies, equipped with certain TRW tie rod assemblies utilizing a cut thread design and sold exclusively to Thomas Built Bus, are involved:

(a) 1320 Axle applications, Thomas Bus Part Number 61110702 and 61110705, installed on Thomas Buses with 6" brakes and 30" air chambers. Production Years 2001 through 2004.

(b) 1460 Axle applications, Thomas Bus Part Number 61110707 and 61110708, installed on Thomas Buses with 6" brakes and 30" air chambers. Production Years 2001 through 2004.

(3) **Recall population:**
Approximately 5,839 steer axles equipped with the subject tie rod assemblies, and installed on Thomas Built buses in combination with 6" brakes and 30" chambers.

(4) **Original Equipment Customers**
The subject steer axle assemblies were sold as original equipment to Thomas Built Bus.

(5) **Approximate percentage of parts/vehicles containing the defect:**
Based on the defect population reviewed the approximate percentage is 2%.

(6) **Description of the defect:**
In this application, a crack may initiate on the internal thread root of the tie rod. This condition is due to inadequate dampening in the chassis system to account for normal brake spraque-induced vibration. These cracks may lead to separation of the tie rod from the assembly.

In the event of a tie rod separation, the driver should still be able to maintain control of the vehicle. A separation will typically occur during the point of highest load, which is normally a low speed steering event typical of a parking lot maneuver. Upon separation, the left front wheel would still provide adequate directional control of the vehicle for stopping. In all cases of tie rod failure for which we have received a report, the driver was able to safely control the vehicle.

Tie rod cracks may be detectable by visual inspection once they have progressed to the exterior of the tie rod. This condition will precede a complete separation.

(7) **Identification of Component Supplier:**
The tie rod assemblies used in the subject steer axles were supplied by:

TRW Automotive
902 Lyons Road
Portland, MI 48875-1097
Representative: David Hobson – Manager Quality Services

(8) **Chronology of the principal events:**

In June, 2003, Thomas Built Bus reported a broken tie rod assembly. The parts were forwarded to the tie rod manufacturer, TRW, for evaluation. In October, 2003, Thomas Built reported two additional tie rod failures. These

assemblies were sent to Dana's Met. Lab for evaluation. Also in October, 2003, Fleet Pride contacted Dana's service department seeking a replacement tie rod assembly for a Dana 1320I steer axle to service a Thomas Built bus. Fleet Pride reported that Laidlaw owned the bus and that Laidlaw kept the failed tie rod assembly.

In December, 2003, a bus from Detroit Transportation was delivered to Dana's Kalamazoo facility for testing. In March, 2004, Dana representatives visited the Detroit Transportation facility to investigate the root cause of the failure. Between May and July, 2004, TRW replaced the tie rod assemblies at the Detroit Transportation location, and advised Dana that it would be conducting an analysis of these assemblies.

In May, 2004, Thomas Built bus advised Dana of a cross tube assembly failure on an E1460I steer axle in Normal, Illinois, McLean County District #5. Dana sent the failed part to TRW for evaluation.

There were no reports of accidents or injuries related to these failures.

From October through December, 2004, representatives from Dana, TRW, Freightliner and Thomas Built Bus continued testing and evaluation of this issue. On January 13, 2005, Dana met with representatives from Freightliner and Thomas Built Bus to review the matter.

On January 21, 2005, Dana decided that the subject components may contain a defect related to motor vehicle safety.

(8) Remedy:
Thomas Built Bus will replace the existing tie rod assemblies, which contain a cut thread design, with a new tie rod assembly that utilizes a rolled thread design. A rolled thread provides less stress on the critical area of the tie rod.

* * *

Please contact me with any questions.

Sincerely,

Michael Koralewski
Director of Quality
Dana Corporation HVTSG North America