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OFFICE OF
DEFECTS INVESTIGATION

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April 20, 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: Non-Compliance Information Report FL-445, Bulkhead Module Software

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 49 Thomas Built C2 school buses manufactured between August 13, 2004 and March 1, 2005.

Attached is a Non-Compliance 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:

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A DaimlerChrysler Company

Non-Compliance Information Report

(Section 573.6)

April 20, 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: Saf-T-liner C2 School Bus

Manufacture Dates: August 13, 2004 to March 1, 2005

Basis for determining population: All C2

Component manufacturer if other than the vehicle manufacturer:

Phoenix International
1441 44th St NW
Fargo, ND 58102
Scott Erickson
Phone 701-277-6166

(c)(3) Total number of vehicles potentially affected: 49

(c)(4) Percentage of vehicles estimated to contain the defect: 100%

(c)(5) Description of Non-Compliance: Software communications conflicts may cause improper operation of certain traffic control devices such as the flashing warning lights or stop signal arm. These devices may not work, or may not work correctly, as required by FMVSS 108 and 131.

(c)(6) Chronology of principal events: In mid-February 2005 a customer reported experiencing signal malfunctions on some buses in his fleet. An investigation revealed an intermittent software problem in the Bulkhead Module that is triggered only on buses highly optioned with electrical devices.

(c)(7) Noncompliance-test or other data: Noncompliance per FMVSS 108 and 131. The lights and signal devices may work intermittently or not at all on some highly optioned buses, as witnessed in the field.

(c)(8) Remedial program: Thomas Built Bus Field Service will reprogram the Bulkhead Module software on all C2 Buses. All customer buses have been sidelined pending the software revision. Thomas Built Bus 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 June 15, 2005.

Reimbursement Plan: All prior repairs are covered by warranty.

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

(c) (11) Manufacturer's campaign number: FL-445