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DEFECT INVESTIGATION

Timothy A. Blubaugh
Director
Government Technical Affairs

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July 22, 2005

OSV-340 (SP99)

Ron Medford
Sr. Associate Administrator for Vehicle Safety
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

**Re: Defect Information Report FL-454,
Thomas Built Bus with Specialty Manufacturing Co. Stop Arm**

Mr. Medford:

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Freightliner LLC herewith reports a safety campaign to recall approximately 13,565 Thomas Built Bus school buses manufactured January through March 8, 2005 with a defect in the Specialty Manufacturing Co. 5-series stop arm assembly.

Attached are Freightliner's Defect Information Report and the Defect Information Report from Specialty

Please contact me if you have any questions.

Sincerely yours,

Timothy Blubaugh by Kaye Goodwin

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

Defect Information Report

(Section 573.6)

July 22, 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: Thomas School Bus Models - Minotour, Conventional, MVP-ER, ER, HDX, and MVP-EF

Manufacture Dates: January 8, 2002 through March 8, 2005

Basis for determining population: School buses manufactured with Specialty Manufacturing 5-series stop arms identified in attached Defect Information Report from Specialty.

Component manufacturer if other than the vehicle manufacturer:

Specialty Manufacturing Co.
10200 Pineville Rd.
Pineville, NC 28134
Phone 704-889-7518

(c)(3) Total number of vehicles potentially affected: 13,565

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

(c)(5) Description of the defect: See Attached Defect Information Report from Specialty Manufacturing Co.

(c)(6) Chronology of principal events: See Attached Defect Information Report from Specialty Manufacturing Co. Specialty sent a notification letter to Thomas Built Bus on June 8, 2005.

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

(c)(8) Remedial program: Specialty will administer this campaign. Thomas will supply the customer mailing list to Specialty Mfg. Repairs will be performed by Thomas dealers and direct warranty customers, i.e., customers approved by Thomas to do their own warranty repairs.

Estimated Owner Notification Date: Specialty will send the customer notification by first class mail using Thomas records to determine the customers affected. This will be completed approximately August 12, 2005.

Reimbursement Plan: Copies will be submitted as a supplemental report when available.

(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-454



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Mr. Ronald Medford
Senior Associate Administrator for Enforcement
NHTSA
400 Seventh Street, SW
Washington, DC 20590

DEFECT INFORMATION
MAY 6 2005

Subject: Defect Information Report

This letter constitutes a defect information report being filed by Specialty Manufacturing Co. (SMC) pursuant to 49 CFR 573.6. SMC manufacturers stop arms exclusively for the school bus industry. This report is being filed because SMC has determined that a safety related defect exist when stop arm manufactured by SMC between January 7, 2002 and February 25, 2005 are used during extreme inclimate/freezing wet weather conditions. This report is presented to comply with 49 CFR Par 573, Defect and Noncompliance Reports.

1. Equipment Manufacturer

Specialty Manufacturing Co.
10200 Pineville Rd.
Pineville, NC 28134
704-889-7518
Contact Person: Mr. Eric Swanger, Engineering Manager
E-mail:

2. Equipment involved in Notification

Specialty Manufacturing 5-series stop arms (identified by model number beginning with "5" such as model 5400) manufactured between January 7, 2002 and February 25, 2005 and sold to:

	<u>Total Number of arms</u>
(a) U.S. Bus	71
(b) Van-Con, Inc.	406
(c) Collins Bus Corporation	1909
(d) IC Corporation Conway, AR	12693
(e) Blue Bird Corporation - Lafayette, GA	see total listed in Ft. Valley
(f) Thomas Bus	23603
(g) IC Corporation Tulsa, OK	14143
(h) Blue Bird Corporation - Ft. Valley, GA	18270
(i) Mid-Bus	2666
(j) Liberty Bus	12

(k) Les Entreprises Corbeil	3934
(l) Girardin Minibus	2029

Additionally, a limited number of stop arms were sold through SMC distributor network for replacement sales.

3. Total Number of Stop Arms Potentially Involved:

In the suspect time period there were approximately 89,000 stop arms sold to the above listed manufacturers and to end users through the SMC distributor network.

4. Percentage of Vehicles Estimated to be Affected:

Given the nature of SMC business, it is impossible to determine an exact number of potentially affected vehicles, although that number is certainly less than 100%. SMC manufactures "catalog" products which meet the safety requirements of FMVSS standards. It is the choice of individual states as to which product is installed on their buses. In most cases, once SMC ships a product to an OEM, SMC has no way in which to track where that products end user may be.

5. Description of Defect

SMC has received reports that in extremely cold weather under certain conditions, the microswitches used internally to position the sign in the open and closed positions may malfunction, causing the sign to open or close to an improper position, or to not open at all. Also, it has been determined that the heater section may not be connected in the proper manner. To date, no accidents or injuries have occurred as a result of this phenomenon. In nearly 100% of the occurrences this phenomenon is intermittent, and ceases to exist once the vehicle is no longer exposed to the extremely cold weather.

6. Chronological Summary of Principal Events Leading to this Report

January 2002 – SMC begins using Arcoelectric microswitches in the manufacturing of 5-series stop arms.

Winter 2003 – SMC begins to see increase in requests from customers for optional microswitch heaters (p/n 05038K)

November 2004 – Bluebird issues Service Update informing customers to contact SMC for issues pertaining to stop arms not performing adequately during winter season.

January 25, 2005 – SMC contacted by Sonny Murianka of ODI at NHTSA concerning Bluebird bulletin.

February 25, 2005 – SMC discontinues usage of Arcoelectric switches.

April 12, 2005 – Representatives of SMC meet with NHTSA/ODI to discuss possible remedy situation and potential recall. ODI agreed with SMC proposal to conduct a regional recall.

7. Remedy Program

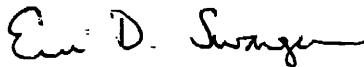
The solution is to retrofit the stop arms in the field with a replacement switch pack that includes switches that are not as sensitive to extreme cold weather and to inspect the heater for proper wiring installation. The replacement switch pack also includes a switch heater which will be wired during installation of the switch pack. This will be a regional recall, as discussed with ODI, and only stop arms used in the selected states will be remedied under this recall. States that will be excluded from this recall are Florida, Georgia, South Carolina, North Carolina, Alabama, Mississippi, Louisiana, Texas, Arkansas, Oklahoma, Arizona, California, and Hawaii

8. Notices, Bulletins, and Communications

Because of the nature of SMC's business, the recall will follow a dual path: OEM's who purchased SMC 5-series stop arms will be notified, as well as SMC distributors who purchased 5-series stop arms for resale. SMC is in the process of developing the notice documents and a replacement procedure for the switch pack, as well as a reimbursement program for distributors who wish to perform their own retrofits. SMC will forward these documents to NHTSA as soon as possible. As discussed with ODI during our meeting at NHTSA, there will be two owner letters sent. Owner location will dictate which letter they will receive: one letter for the included states, the other letter for the owners not included in the recall (warm states), but advising them of the recall. SMC will work with each final stage manufacturer, in a combined effort, to draft the appropriate letters. SMC will investigate any claim from a fleet outside of the recalled states if they have experienced the problem and will make a case by case determination if that fleet is subject to the recall remedy.

We will start contacting the final stage manufacturers after all paper work has been acknowledged by NHTSA and a recall number has been assigned.

Thank you,



Eric D. Swanger, PE
Engineering Manager
Specialty Manufacturing Co.