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OFFICE OF  
DEFECTS INVESTIGATION

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May 9, 2005

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

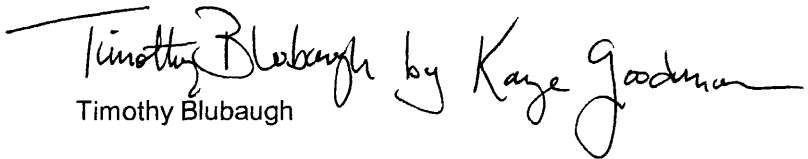
**Re: Defect Information Report (FL-438), NHTSA no. 05V-001  
Gra-Mag Seats**

Mr. Medford:

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Freightliner LLC herewith submits supplemental defect information and copies of documents distributed to dealers and purchasers.

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 3402 7010

**Section 573.6 Defect Information Report**  
**FL-438, NHTSA no. 05V-001**  
**Supplement No.: 1**

May 9, 2005

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

**(c) (3) Total number of vehicles potentially affected:** (Revise to read) 1,740  
409 vehicles have been modified, 1,331 remaining to be repaired

**(c) (9) Communications sent to dealers:** posted April 18, 2005  
**Communications sent to owners:** mailed April 20, 2005

## Subject: GRA-MAG Seat Pivot Bolts

**Models Affected: Specific Freightliner Columbia vehicles manufactured between August 26, 2002, and October 5, 2004.**

### General Information

Freightliner LLC, on behalf of its Freightliner Trucks Division, has decided that a defect which relates to motor vehicle safety exists on the vehicles mentioned above.

There are approximately 1,700 vehicles involved in this campaign.

The seat pivot bolts may become loose, fracture or dislodge which may allow the seat back to fail to provide full support to the driver. A possible vehicle crash without prior warning could result should the seat fall backwards during vehicle operation.

The seat pivot bolts will be re-torqued after threadlock is applied.

**IMPORTANT:** Vehicles in FL438B have already been repaired. FL438B is for reporting purposes only.

### Additional Repairs

Dealers must complete all outstanding recall and field service campaigns prior to the sale or delivery of a vehicle. A Dealer will be liable for any progressive damage that results from its failure to complete campaigns before sale or delivery of a vehicle.

Owners may be liable for any progressive damage that results from its failure to complete campaigns within a reasonable time after receiving notification.

### Work Instructions

Please refer to the attached work instructions. Prior to performing the campaign, check the vehicle for a completion sticker (Form WAR260).

**IMPORTANT:** The tracking of seat serial numbers is required. Please follow the instructions in the Claims for Credit and Work Instructions sections.

### Replacement Parts

There are no replacement parts. Loctite<sup>®</sup> 262 is required for the recall repair and must be claimed as a miscellaneous part with the cost not to exceed \$2.00.

If our records show your dealership has ordered any vehicles involved in campaign number FL438A, a list of the customers and vehicle identification numbers will be available on [AccessFreightliner.com](http://AccessFreightliner.com).

### Removed Parts

There are no removed parts for this campaign.

# Recall Campaign

April 2005  
FL438A  
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## Labor Allowance

Table 1 - Labor Allowance.

Campaign Number	Procedure	Time Allowed (hours)	SRT Code	Damage Code
FL438A	DRIVER AND PASSENGER SEATS: Repair four seat pivot bolts on two seats (two on each seat).	2.0	996-0614B	000-Modifiedx

Table 1

**IMPORTANT:** When the recall has been completed, locate the base completion label in the appropriate location on the vehicle, and attach the red completion sticker provided in the recall kit (Form WAR260). If the vehicle does not have a base completion label, clean a spot on the appropriate location of the vehicle and first attach the base completion label (Form WAR259). If a recall kit is not required or there is no completion sticker in the kit, write the recall number on a blank sticker and attach it to the base completion label.

## Claims for Credit

You will be reimbursed for your parts, labor, and handling by submitting your claim through the Warranty system within 30 days of completing this campaign. Please reference the following information in QuickClaim®:

- Claim type is **Recall**.
- In the FTL Authorization field, enter the campaign number and appropriate condition code (**FL438A**).
- In the Primary Failed Part Number field, enter **25-FL438-000**.
- In the Parts field, add Loctite® 262, which is required for the recall repair. This threadlock must be claimed as a miscellaneous part (ZZ Loctite® 262) with the cost not to exceed \$2.00 US.
- In the Labor field, first enter the appropriate SRT from the Labor Allowance Table. For administrative time, enter SRT 939-0010A for 0.3 hours.
- In the Comments field, document the serial number of each seat repaired as "Seat Serial: XXXXX". This is required information.
- **Reimbursement for Prior Repairs.** When a customer asks about reimbursement, please do the following.
  - Accept the documentation of the previous repair.
  - Make a brief check of the customer's paperwork to see if the repair may be eligible for reimbursement. (See the "Copy of Owner Letter" section of this bulletin for reimbursement guidelines for this recall.)
  - Contact the Warranty Campaigns Department for a decision and authorization number.
  - Include the approved amount on your claim in sublet/outside purchases.
  - In the claim story, first note the authorization number and that the claim includes a reimbursement request.
  - Retain the documentation and provide it to Warranty Campaigns or Claims Processing if requested.
  - When your claim is paid, reimburse the customer the appropriate amount.
  - If Freightliner LLC denies a customer's request for reimbursement, the amount will be denied on your claim with a message stating this, and Freightliner LLC will send a letter to the customer with the reason(s) for the denial.

NOTE: ServicePro®/Service Advisor® must be viewed prior to performing the recall to ensure the vehicle is involved and the campaign has not been previously completed. Also, check for a completion sticker prior to beginning work.

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Contact the Warranty Campaigns Department at (800) 547-0712, from 7:00 a.m. to 4:00 p.m. Pacific Time, Monday through Friday, Web inquiry at [AccessFreightliner.com](http://AccessFreightliner.com) / Support / Submit an Inquiry, or the Customer Assistance Center at (800) 385-4357, after normal business hours, if you have any questions or need additional information.

To return excess kit inventory related to this campaign, U.S. dealers must submit a Parts Authorization Return (PAR) to the Memphis PDC. Canadian dealers must submit a PAR to their facing PDC. All kits must be in resalable condition. PAR requests must include the original purchase invoice number.

The letter notifying vehicle owners is included for your reference.

Please note that the National Traffic and Motor Vehicle Safety Act, as amended (49 USC), requires the owner's vehicle(s) be corrected within a reasonable time after parts are available to you. The Act states that failure to repair a vehicle within 60 days after tender for repair shall be prima facie evidence of an unreasonable time. However, circumstances of a particular situation may reduce the 60 day period. Failure to repair a vehicle within a reasonable time can result in either the obligation to (a) replace the vehicle with an identical or reasonably equivalent vehicle, without charge, or (b) refund the purchase price in full, less a reasonable allowance for depreciation. The Act further prohibits dealers from selling a vehicle unless all outstanding recalls are performed. Also, any lessor is required to send a copy of the recall notification to the lessee.

Finally, the Act states that a remedy need not be provided without charge if the vehicle was bought by the first purchaser more than ten (10) calendar years before notice is given.

# Recall Campaign



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## Copy of Letter to Owner Subject: GRA-MAG Seat Pivot Bolts

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act and the Canadian Motor Vehicles Safety Act.

Freightliner LLC, on behalf of its Freightliner Truck Division, has decided that a defect which relates to motor vehicle safety exists on specific Freightliner Columbia vehicles manufactured between August 26, 2002, and October 5, 2004.

The seat pivot bolts may become loose, fracture or dislodge which may allow the seat back to fail to provide full support to the driver. Should the seat fall backwards during vehicle operation, a possible vehicle crash without prior warning may result.

The seat pivot bolts will be re-torqued after threadlock is applied.

Contact your authorized dealer to arrange to have your vehicle(s) modified. If you need to locate a dealer, search online at [www.Freightliner.com](http://www.Freightliner.com) or contact the Warranty Campaigns Department for assistance.

When you contact your dealer, refer to campaign number **FL438A**. The modification may take up to two hours and will be performed at no charge to you.

As stated in the terms of your express limited warranty, Freightliner LLC will not pay for any damage caused by failure to properly maintain your vehicle. Freightliner LLC considers the work necessary under this campaign to be proper maintenance and will, therefore, not pay for any damage to your vehicle caused by your failure to have the repairs that are the subject of this campaign performed in a reasonable time.

**IMPORTANT:** When the recall has been completed, please ensure that a label has been affixed to your vehicle referencing **FL438**.

If you do not own the vehicle that corresponds to the identification number(s) which appears on the Recall Notification, please return the notification to the Warranty Campaigns Department with any information you can furnish that will assist us in locating the present owner. If you have leased this vehicle, please make sure this notification is immediately forwarded to the lessee. If you have paid to have this recall condition corrected prior to this notice, you may be eligible to receive reimbursement. Please see the reverse side of this notice for details.

If you are not able to have the defect remedied without charge and within a reasonable time, which is not longer than 60 days after you tender the vehicle for repair, please contact the Warranty Campaigns Department at (800) 547-0712, 7:00 a.m. to 4:00 p.m. Pacific Time Monday through Friday, e-mail address [WarrantyCampaigns@freightliner.com](mailto:WarrantyCampaigns@freightliner.com), or the Customer Assistance Center at (800) FTL-HELP or (800) STL-HELP, after normal business hours. You may also wish to submit a complaint to the Administrator, National Highway Traffic Safety Administration, 400 7th Street S.W., Washington, D.C. 20590, or phone (888) 327-4236. If your vehicle is involved in the Canadian portion, you may wish to notify Transport Canada, ASFAD, Place de Ville Tower C, 330 Sparks Street, Ottawa, ON K1A 0N5, or phone (800) 333-0510.

We regret any inconvenience this action may cause but feel certain you understand our interest in motor vehicle safety.

WARRANTY CAMPAIGNS DEPARTMENT

Enclosure

## Reimbursement to Customers for Repairs Performed Prior to Recall

If you have already **paid** to have this recall condition corrected you may be eligible to receive reimbursement.

Requests for reimbursement may include parts and labor. Reimbursement may be limited to the amount the repair would have cost if completed by an authorized Freightliner LLC dealer. The following documentation must be presented to your dealer for consideration for reimbursement.

Please provide original or clear copies of all receipts, invoices, and repair orders that show:

- The name and address of the person who paid for the repair.
- The Vehicle Identification Number (VIN) of the vehicle that was repaired.
- What problem occurred, what repair was done, when the repair was done.
- Who repaired the vehicle.
- The total cost of the repair expense that is being claimed.
- Proof of payment for the repair (such as the front and back of a cancelled check or a credit card receipt).

Reimbursement will be made by check from your Freightliner LLC dealer. If your claim is denied, you will receive a letter from Freightliner LLC with the reason(s) for the denial.

Please speak with your Freightliner LLC authorized dealer concerning this matter.

# Recall Campaign

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## Work Instructions

### Subject: GRA-MAG Seat Pivot Bolts

**Models Affected: Specific Freightliner Columbia vehicles manufactured between August 26, 2002, and October 5, 2004.**

#### Pivot Bolts Repair Procedure

1. Turn off the engine, apply the parking brakes, and chock the rear tires.
2. Before starting the modification procedure, check the base label (Form WAR259) on the vehicle for a completion sticker (Form WAR260) for FL438 indicating that this work is completed. The base label is usually located on the passenger door about 12 inches (30 cm) below the door latch. **Also** inspect the involved seat base frame for a yellow completion sticker used by GRA-MAG for seat repairs prior to the recall activation.

If either of the completion stickers are found, no further work is needed. Remove the chocks from the tires.

If the completion sticker is not found, proceed to the next step.

#### **WARNING**

**The seat contains moving parts that, if moved or inadvertently touched, may cause personal injury. Take care when working on the seat to avoid personal injury.**

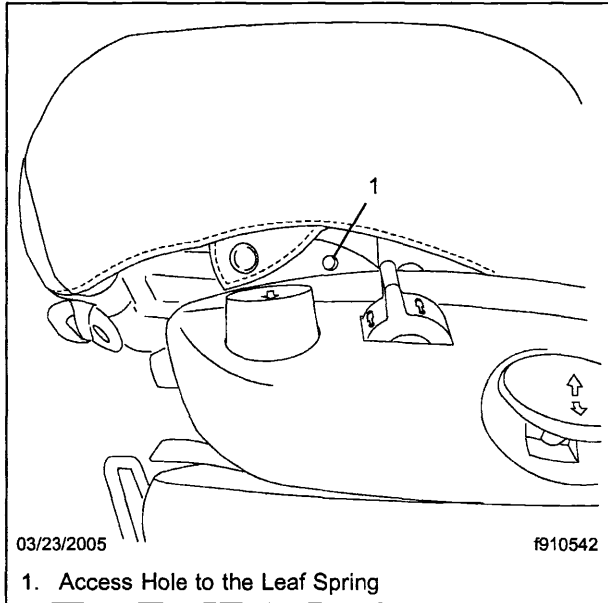
3. Fully extend the seat cushion, then pull back the cushion trim on the side of the seat that has the controls. Locate the access hole to the leaf spring. See **Fig. 1**.

**NOTE:** The standard seat does not have the seat cushion extension. On the standard seat the pan locks on both sides, not just the left side. Use the forwardmost access holes on the standard seat.

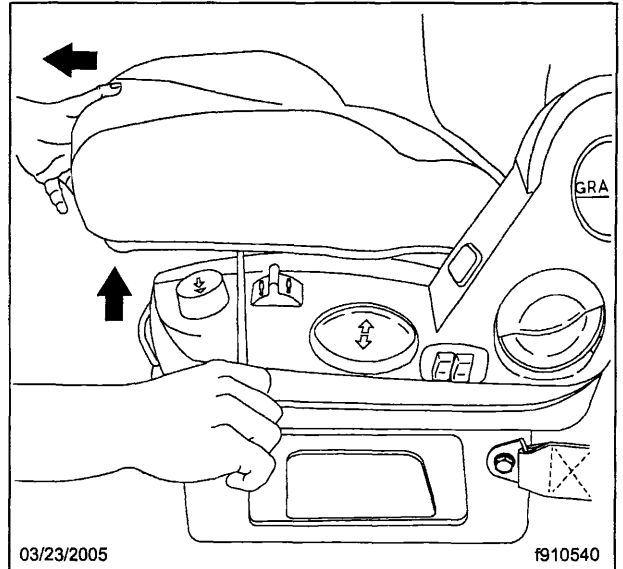
4. Locate the leaf spring on the seat pan. Using a narrow screwdriver, pry the spring up to unlock the seat pan. Engage the cushion extender lever and pull the seat pan forward and up until the pan releases from the seat frame. See **Fig. 2**.

Once the seat pan is removed from the seat frame, lay it aside so that the material and the tilt cable do not get damaged. Do not rotate or flip the seat cushion as this will cause the tilt cable to be thrown out of adjustment and the tilt function will not work properly.

5. Locate the screw on the inside of the side shield near the pivot point. Using a Torx® screwdriver, remove the screw. See **Fig. 3**.
6. Looking at the back of the seat, locate the four-prong plastic post that locks in to the seat frame. Using a narrow screwdriver, push the prongs together while applying outward pressure on the side shield. The shield should pop loose. See **Fig. 4**.
7. At the front of the seat where the side shield meets the front shield, locate the place where the two shields lock together. Using a narrow screwdriver, push the locked shields apart, being careful not to damage them. See **Fig. 5**.
8. The side shield is now held on by two plastic mounts, and the shield fastens to the mounts in four places—two at the top and two at the bottom. To remove the shield at the top, gently push down on the two plastic flanges that lock in to the shield mounts until they are free. See **Fig. 6**.

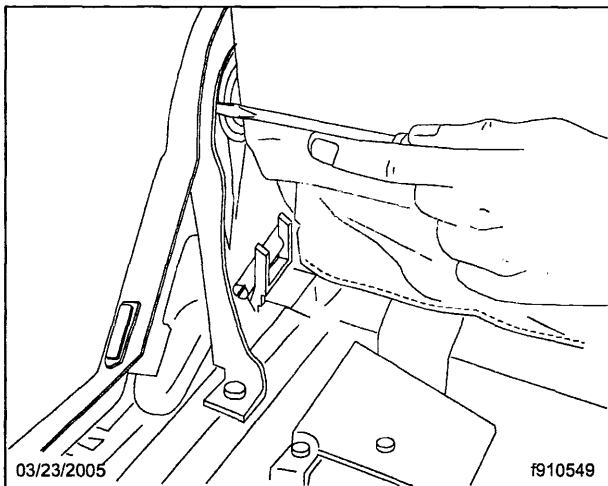


**Fig. 1, Locate the Access Hole**

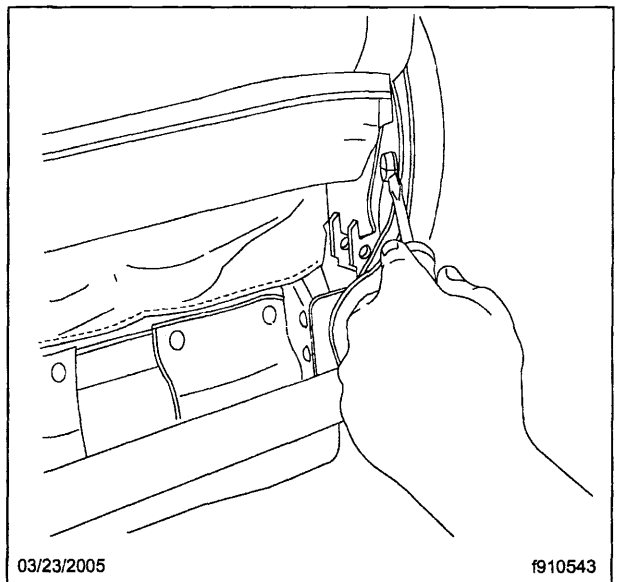


**Fig. 2, Pry the Spring Up and Pull the Seat Pan Forward**

9. Locate the place where the side shield fastens to the mount at the bottom. Using a narrow screwdriver, push down on the shield mount where it interlocks with the side shield while gently pulling outward on the shield until it is loose. See Fig. 7.
10. Locate the screw on the inside of the side shield near the pivot point. Using a Torx screwdriver, remove the screw. See Fig. 8.



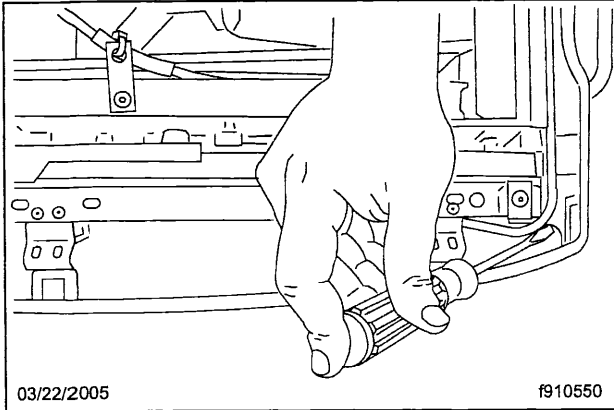
**Fig. 3, Remove the Screw**



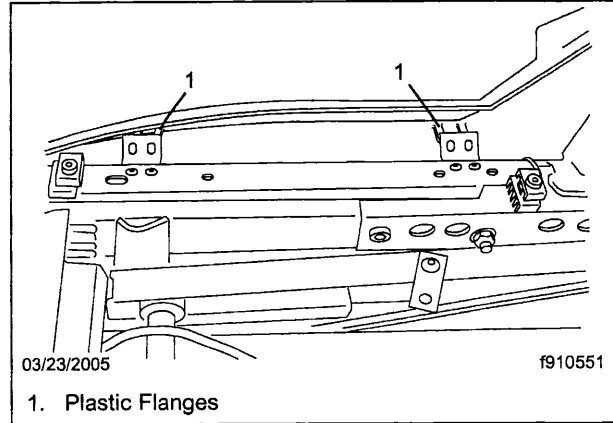
**Fig. 4, Loosen the Shield**

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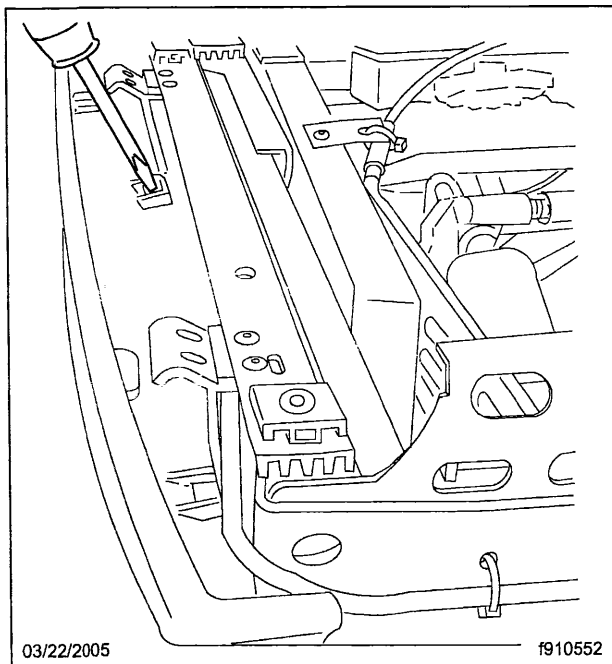


**Fig. 5, Push the Locked Shields Apart**

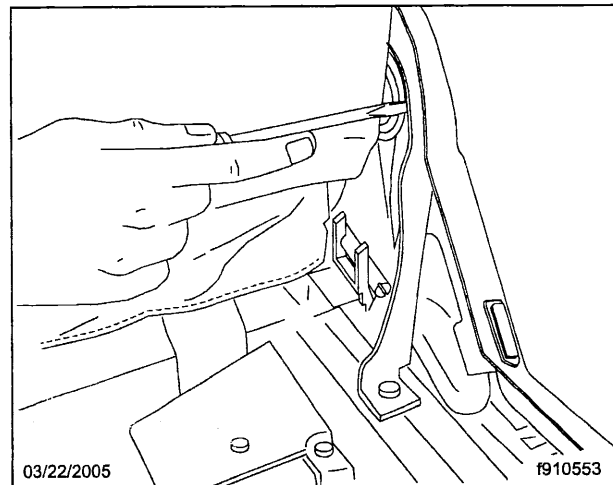


**Fig. 6, Push Down on the Plastic Flanges**

11. Locate the screw on the underside of the height adjustment lever. Using a Torx screwdriver, raise the lever to the full up position and remove the screw, then pull off the lever. Standard seats do not have this lever. See **Fig. 9**.
12. Looking at the back of the seat, locate the four-prong plastic post that locks in to the seat frame. Using a narrow screwdriver, push the prongs together while applying outward pressure on the side shield. The shield should pop loose. See **Fig. 10**.



**Fig. 7, Push Down on the Shield Mount**



**Fig. 8, Remove the Screw Near the Pivot Point**

13. At the front of the seat, where the side shield meets the front shield, locate the place where the two shields lock together. Using a narrow screwdriver, push the locked shields apart, being careful not to damage them. See Fig. 11.
14. On the inner side of the side shield located at the top, are two fasteners. Gently lift the fasteners until they are free of the mounts. Do not to apply too much pressure on the fasteners or you will damage them, and the side shield will not mount securely to the seat. See Fig. 12.
15. The side shield is now held on by two fasteners at the bottom of the shield. Grasping the shield from underneath, locate the two fasteners and gently pull the shield outward until the fasteners come loose. After the shield is free from the mounts, remove it from the seat, being careful not to damage any air lines or levers. See Fig. 13.

NOTE: There are two variations of pivot bolts in Gra-Mag seats. The M12 bolt is black and requires a 22-mm socket to remove it. The M14 is gold and requires a 24-mm socket to remove it.

IMPORTANT: Remove only one pivot bolt at a time. If both bolts are removed, the back frame and springs may come loose and it will be more difficult to install the bolts.

16. Tilt the seat back all the way forward. Using the correct size socket, remove one pivot bolt. See Fig. 14.
17. Using Loctite<sup>®</sup> ODC-Free Cleaner & Degreaser, thoroughly clean the threads on the bolt that was removed and the threads on the seat back frame. It is very important to have a clean, dry surface in order for the Loctite<sup>®</sup> to work properly.
18. After the threads on the pivot bolts and seat back frame have been thoroughly cleaned and wiped dry, apply Loctite<sup>®</sup> 262 to the threads of the pivot bolt only. Be sure to cover the entire thread surface with Loctite. Do not use any other type of threadlock.
19. Insert the pivot bolt into the frame by hand and tighten it until it seats. Once seated, torque the M12 bolt 30 to 32 lbf-ft (40 to 44 N-m); torque the M14 bolt 37 to 41 lbf-ft (50 to 55 N-m).
20. Repeat the previous four steps on the other pivot bolt.

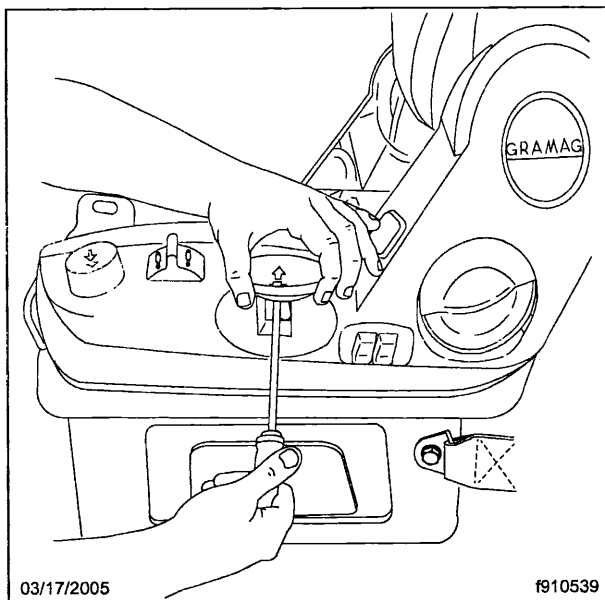


Fig. 9, Remove the Height Adjustment Lever

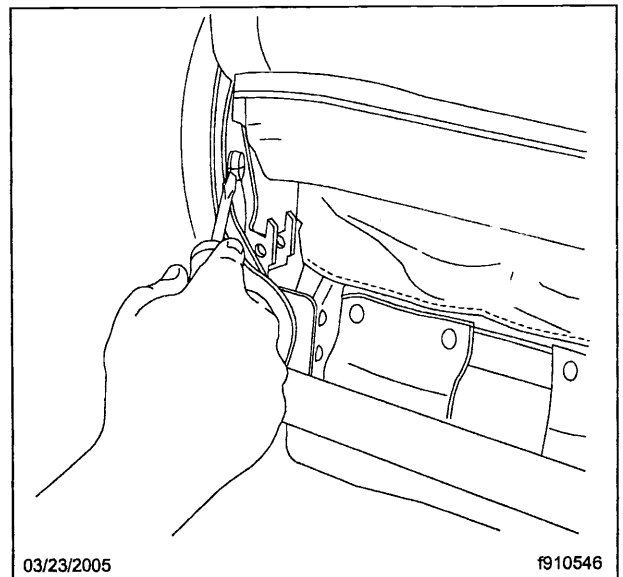
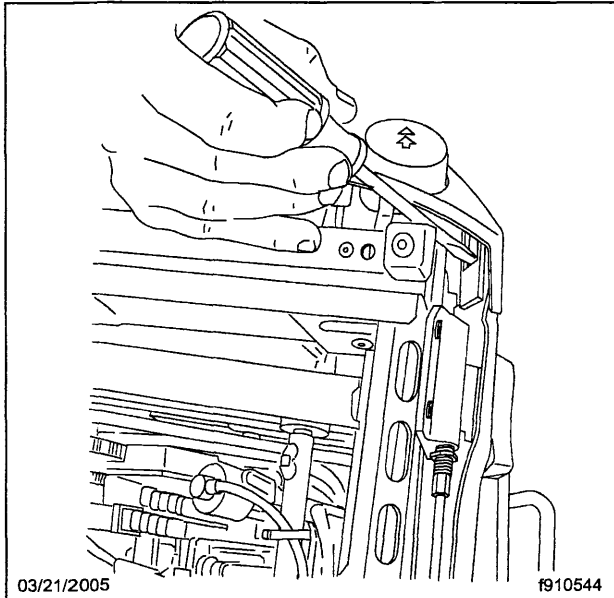


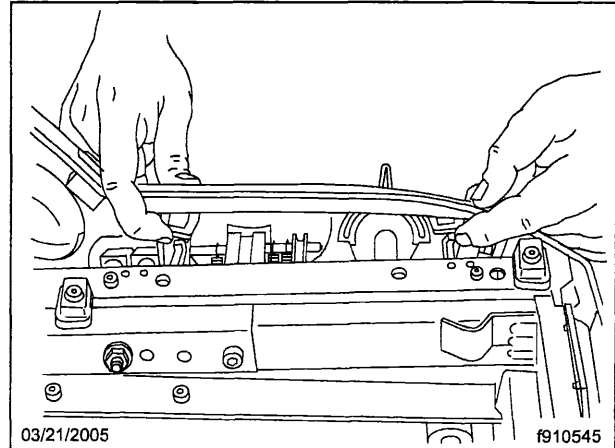
Fig. 10, Loosen the Shield

# Recall Campaign

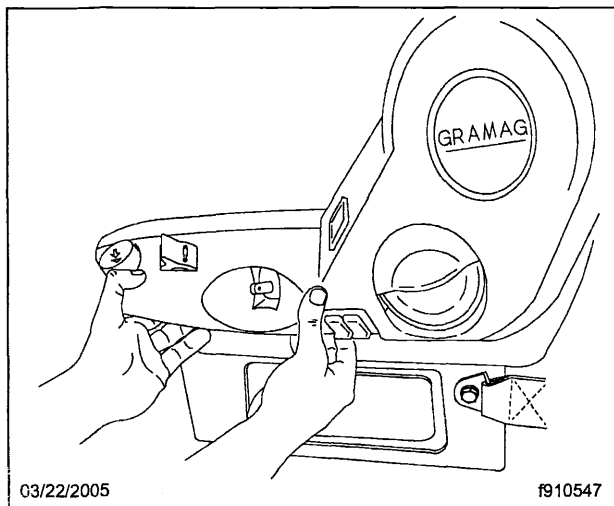
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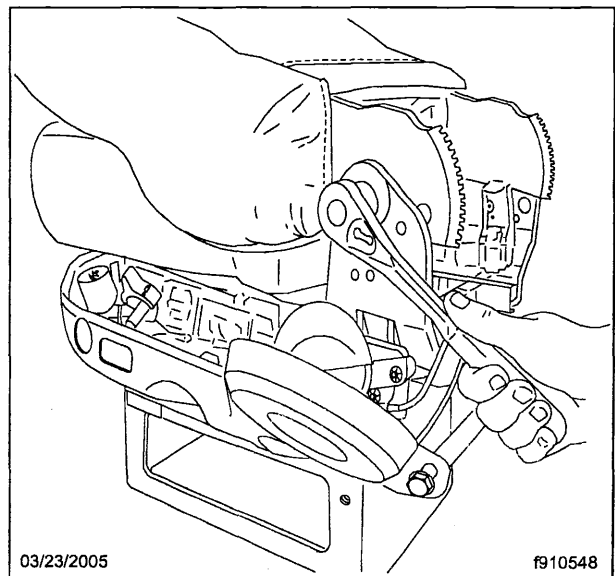
**Fig. 11, Push the Locked Shields Apart**



**Fig. 12, Lift the Fasteners Free of the Mounts**



**Fig. 13, Remove the Side Shield**



**Fig. 14, Remove One Pivot Bolt at a Time**

21. After both pivot bolts have been installed in the seat and torqued, install the side shields.
22. Lock the cushion pan to the seat frame. Make sure that the side shields and the seat pan are correctly fastened to the seat frame.
23. Check all of the seat functions. Pay close attention to the tilt function. Removing the seat pan can sometimes affect the tilt cable adjustment.

# Recall Campaign

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24. Repeat these procedures on the remaining seat beginning at step 3.
25. **IMPORTANT:** Note the seat serial numbers on the repair order. This information is required for the claim filing procedure.
26. Clean a spot on the base label (Form WAR259). Attach a completion sticker (Form WAR260) for recall FL438 to the base label.