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DEFECT INVESTIGATION

06V-014

(3pgs.)

Timothy A. Blubaugh
Director
Government Technical Affairs

Freightliner LLC
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January 6, 2006

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

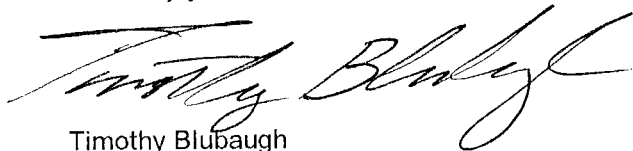
Re: Defect Information Report FL- 469

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 360 Thomas Bus HDX school buses manufactured approximately July 2005 through November 2005 with potentially defective front suspension springs.

Attached is Freightliner's Defect Information Report and the Supplier Notification. 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 3882

Defect Information Report
(Section 573.6)

January 6, 2006

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

Brands: Thomas Bus

(c)(2) Vehicles identification:

Model(s) affected: HDX School Bus

Model Years affected: 2006

Manufacture Dates: Approximately July 2005 through November 2005.

Basis for determining population: Vehicles potentially built with springs from lot numbers identified by the spring manufacturer.

Component manufacturer if other than the vehicle manufacturer:

Suspensiones DSP, S.A. De C.V.

Carret. A Villa de Garcia Km 5.5

Garcia, N.L. C.P. 66000

Mexico

Duane Ricketts, President, Suspensiones

(c)(3) Total number of vehicles potentially affected: Approximately 360

(c)(4) Percentage of vehicles estimated to contain the defect: 10%

(c)(5) Description of the defect: The front spring eyes may crack.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: Vehicle steering control may be reduced if abnormal front suspension noises are ignored, possibly resulting in a crash and personal injury.

(c)(6) Chronology of principal events: Thomas Built received a field report in mid-November concerning cracks in the eyes of some front springs on HDX school buses. Cracks and broken spring eyes were noticed when inspecting for abnormal noises in the front suspension. A plant inspection revealed more vehicles with cracked front spring eyes. There are no incidents, injuries or reports of loss of vehicle control. The supplier analyzed returned springs and found them to suffer from embrittlement due to an improper heat treat process and recommends that a recall campaign be conducted.

(c)(7) Noncompliance-test or other data:

(c)(8) Remedial program: Repairs will be performed by Freightliner dealerships and Direct Warranty customers. Dealers will be notified approximately February 15, 2006. The remedy calls for replacement of the front springs.

Estimated Owner Notification Date: Customer notification will be by first class mail using Thomas Built records to determine the customers affected. This will be completed approximately February 20, 2006.

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-469



Suspensiones DSP, S.A. De C.V.

Carret. A Villa de García Km 5.5
García, N.L. C.P. 66000
Tel. (52) 81-13-65-4400 Fax (52) 81-83-45-40-47

December 20, 2005

Ken W. Dodson
Jim Freigburger
Thomas Built Bus
1408 Courtesy Road
High Point, NC 27260

Dear Ken and Jim:

This will confirm our previous conversations regarding our evaluation of the springs supplied to Thomas Built Bus which were reported to have had eyes break after installation. Based upon our evaluation, Suspensiones DSP has determined that this requires us to institute a product recall and replacement of all of the springs from four lots provided to Thomas Built Bus.

We have determined that there are four Lot# (Date Codes) that require replacement. Listed below are the Lot# (Date Codes) and the date and the quantity shipped to Thomas Built Bus.

Lot# (Date Code)	Date of First Shipment	Date of Last Shipment	Quantity Shipped
SD5241851	June 28, 2005	August 12, 2005	231
SD5301873	July 27, 2005	August 12, 2005	157
SD5331855	September 7, 2005	October 11, 2005	291
SD5381956	October 11, 2005	November 5, 2005	210

All of the springs produced since those listed above and provided to Thomas Built Bus have had their eyes checked 100% to ensure that they meet specifications.

We feel this is a defect that relates to motor vehicle safety and requires notification to the National Highway Transportation Safety Administration (NHTSA) and a recall campaign which will involve NHTSA. We will work with you to do everything needed to resolve this issue as quickly as possible. We understand that Thomas Built Bus desires to make the notification to NHTSA and handle the necessary communications regarding the recall campaign.

Attached is a matrix of all the reported broken eyes that have been reported to us to date. Please advise us of the assistance you require.

Sincerely, Duane Ricketts

President, Suspensiones