



Timothy A. Blubaugh
Director
Government Technical Affairs

Freightliner LLC
4747 N. Channel Avenue
Portland, OR 97217-2689
503.745.5219 Telephone
503.745.6800 Facsimile
TimothyBlubaugh@Freightliner.com

February 1, 2006

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

06V-030
(9 pages)

Re: Defect Information Report FL-471, Caterpillar C15 VVA Oil Line

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 5,777 Freightliner Star Trucks and Freightliner Star Trucks manufactured April 9, 2003 to October 7, 2005 with a defective Caterpillar Valve Actuation oil line on the Caterpillar C15 engines.

Attached are Freightliner's Defect Information Report and Caterpillar's Part 573 Defect information Report NHTSA no. 05E-078.

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 0003 3403 4036

Defect Information Report

February 1, 2006

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

Brands: Freightliner Trucks, Sterling Trucks, Western Star

(c)(2) **Vehicles Identification:**

Model(s) affected: To be determined, the truck model information will be supplied on a supplemental report.

Model Years affected: 2004, 2005, 2006

Manufacture Dates: April 9, 2003 to October 7, 2005

Basis for determining population: A list of engine serial numbers was supplied by Caterpillar. Freightliner production records have been used to identify the vehicles manufactured with the subject engine.

Component manufacturer: Caterpillar Inc. **an the vehicle manufacturer:**

Caterpillar Inc.
100 NE Adams Street
Peoria, Illinois 61629-7150

(c)(3) **Total number of vehicles potentially affected:** 5,771

(c)(4) **Percentage of vehicles estimated to contain the defect:** 4% - See attached Part 573 defect report from Caterpillar Inc.

(c)(5) **Description of the defect:** See attached Part 573 defect report from Caterpillar Inc.
49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: Reference Caterpillar 05E-078 letter December 21, 2005. -- Oil line wear may cause an oil leak and a potential fire hazard.

(c)(6) **Chronology of principal events:** See attached Part 573 defect report from Caterpillar Inc. Freightliner received the Defect Information Report from Caterpillar on December 16, 2005

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

(c)(8) **Remedial program** Customers will be notified by Caterpillar. See defect report from Caterpillar. Caterpillar has provided a list of subject engine serial numbers. Freightliner production records have been used to identify the vehicles.

Estimated dealer notification date, Summary of modification: Customers will be notified by Caterpillar. See defect report from Caterpillar.

Estimated Owner Notification Date: Customers will be notified by Caterpillar. See defect report from Caterpillar.

Reimbursement Plan: Customers will be notified by Caterpillar.

(c)(9) **Communications sent to dealers and owners:** Customers will be notified by Caterpillar. See defect report from Caterpillar

(c)(10) **Copy of proposed owner notification letter:** Customers will be notified by Caterpillar. See defect report from Caterpillar.

(c)(11) **Manufacturer's campaign number:** FL-471

CATERPILLAR™

CSE 078 (3pp)

DEC 12 12 13 19

Peoria, Illinois 61629-7150

POSTAGE AND FEES PAID

December 12, 2005
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ken Weinstein
Associate Administrator
Office of Defects Investigation Enforcement
National Highway Traffic Safety Administration
400 Seventh St. S.W.
Washington, D.C. 20590

Dear Mr. Weinstein:

In accordance with the requirements of the National Traffic and Motor Vehicle Safety Act and the procedure prescribed in 49 CFR 575, attached is our notification of a possible safety related defect that may exist with VVA Lines used with Caterpillar C15 Diesel Engines.

Please contact me if there are additional requirements regarding this notification.

Very truly yours,



Thomas S. Lane
Engine Product Safety Manager
Regulations & Product Compliance

Phone (309) 675-6496
Fax (309) 675-6181

1) MANUFACTURER

Caterpillar Inc.
100 N.E. Adams St.
Peoria, IL 61629-7150

2) COMPONENT IDENTIFICATION

Model No.: C15 Diesel by Caterpillar Inc.
Serial No. Prefixes: BS
Manufacturing Dates: October 2003 through April 2005
Component Description: Variable Valve Actuation (VVA) Oil Line ("VVA Line") used on 6 cylinder, 15L turbocharged and air-to-air aftercooled diesel engines of 435-550 Horsepower.

3) NUMBER OF ENGINES POTENTIALLY CONTAINING DEFECT

55,794

4) ESTIMATED PERCENTAGE OF ENGINES POTENTIALLY CONTAINING DEFECT

4% of the engine population identified in 3 above.

5) DEFECT DESCRIPTION

The VVA Line may wear against the cylinder head on certain heavy-duty trucks with Caterpillar 2004 and 2005 MY C15 engines.

6) WERE THE BASIS FOR MAKING RECALL

- a) aware of the potential for the VVA Line wear to wear prematurely in certain C15 engines.
- b) Caterpillar's investigation determined that the VVA Line could, if not oriented correctly, rub the sharp edge of the cylinder head, and potentially cause wear or compromise of the VVA Line.
- c) Caterpillar thereafter implemented in production a second clip to retain the VVA Line away from the cylinder head and eliminate the potential for compromise of the VVA Line.
- d) Caterpillar worked with PACCAR to resolve potential complications with the remedial addition of the second clip caused by PACCAR's removal of the rear lifting eye from the C15 engines during chassis installation.
- e) Caterpillar issued two (2) Priority Product Improvement Programs ("PIPs") to engine owners and Caterpillar dealers directing the dealers to add a second clip to retain the VVA Line if VVA Line wear was noted during inspection. The PIPs were included in Caterpillar's July 13, 2005 TREAD Act monthly report.

- f) On August 31, 2005 NHTSA ODI contacted Caterpillar to discuss whether the VVA Line remediation referenced in the PIPs should be addressed by a 573 notification. NHTSA ODI opened PE05-049 on September 9, 2005 to formalize the review.
- g) On November 22, 2005, NHTSA ODI and Caterpillar met to review NHTSA's concerns and Caterpillar's warranty claim data and field/service reports regarding the VVA line wear and remediation.
- h) Caterpillar informed NHTSA ODI on December 5, 2005 that it would convert the Caterpillar Priority Product Improvement Programs to Recalls and report according to 49 CFR 573 and notify customers per 49 CFR 577.

7) PROGRAM TO REMEDY DEFECT

The program to remedy the defect is as follows:

- A) Caterpillar will issue a two (2) Safety Product Improvement Programs (Recall) in which owners will be notified in accordance with 49 CFR 577.
 - a. Inspect engine and VVA Line as part of daily inspection and take the engine to a Caterpillar engine repair facility for addition of the second clip, and line replacement as necessary, if the line shows wear, or if the customer prefers, take the engine to a Caterpillar engine repair facility who will perform the inspection and remedial action as necessary.
 - b. In cases where potential complications with the remedial addition of the second clip in PACCAR chassis's exists, customers will be requested to take the engine to a Caterpillar engine repair facility who will perform the inspection and remedial action as necessary.
- B) Vehicle Manufacturers (OEMs) will be notified of the possible safety defect and planned Safety Product Improvement Program.
- C) No fewer than five (5) days prior to publication of the Safety Product Improvement Program letter to the owner letters, Caterpillar will submit the proposed owner (customer) notification letter to the NHTSA Recall Analysis Division for input and approval.
- D) Caterpillar dealers will be notified of the Safety Product Improvement Program. Caterpillar will provide a representative copy of the Safety Product Improvement Program letter to NHTSA no later than 5 days after its initial distribution.

CATERPILLAR

Caterpillar Inc.
100 NE Adams Street
Peoria, Illinois 61629-7150

December 21, 2005
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George Person, Chief
Recall Analysis Division
National Highway Traffic Safety Administration
400 Seventh St. S.W.
Washington, D.C. 20590

Dear Mr. Person:

Reference Recall No. 05E-078

This memo is in response to your acknowledgement memo (NYS-215kjs), received on December 20, 2005. It also clarifies the population and reports OEM notification.

Acknowledgement Response

- 1) I will call you to understand your process, but per this memo, you are asking for confirmation of information prior to this information being made available to the public. The issue is that your memo was dated 12-20-05 and this information was on the NHTSA website 12-19-05, and possibly sooner.
- 2) Consequence -- I recommend the following wording:

Oil line wear may cause an oil leak and a potential fire hazard.

- 3) Remedy -- It needs to be clear that it is up to the customer whether they do the inspection and confirm such with Caterpillar or whether the customer elects to have the dealer inspect the oil line. This impacts customer "down time". Also, my 12-13-05 email to Kelly Schuler (attached) stated that we will be able to mail letters to customers no later than 1 February 2006. I have expanded that to include dealer notification also. To that end, I would recommend the following wording be used:

Inspect and add a second clip to retain the VVA line if VVA line wear is noted during inspection. Caterpillar will notify dealers and mail notification letters to customers prior to February 1, 2006.

- 4) Caterpillar has initiated efforts to compile and publish our Safety Product Improvement Program for this recall campaign. I will be sending you our draft customer notification letter the week of January 3, 2006.

Population Clarification

1) Number of engines potentially containing defect	55,794
2) Number of engines remedied by existing service letters	8,984
3) Recall population	46,810
4) Shipped to vehicle manufactures	46,306
5) Sold to customers directly by Caterpillar	504

The attached vehicle OEM notifications contain the quantity by manufacturer.

OEM Notification

The OEM contact list is attached with the quantity by manufacturer. The notifications sent to each OEM vehicle manufacturer are also attached.

I also look forward to working with you and Kelly for successful completion of this recall campaign. I will also email Kelly this memo and attachments today.

Please contact me if there are any questions or additional requirements regarding this notification.

Sincerely,



Thomas S. Lane
Engine Product Safety Manager
Regulations & Product Compliance

Phone & Fax (309) 675-6496

Lane.Tom.S@ent.com

Attach: NHTSA email 12_13_05.doc
OEM Contact List vva line.pdf
american trk notice 12_20_05.pdf
freightliner notice 12_16_05.pdf
international notice 12_16_05.pdf
kenworth notice 12_16_05.pdf
ashkoshi notice 12_20_05.pdf
peterbilt notice 12_16_05.pdf



Timothy A. Blubaugh
Director
Government Technical Affairs

Freightliner LLC
4747 N. Channel Avenue
Portland, OR 97217-7699
503.745.5219 Telephone
503.745.6800 Facsimile
TimothyBlubaugh@Freightliner.com

February 8, 2006

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

**Re: Defect Information Report – supplemental information
(FL-471), NHTSA no. 05V- not available, Caterpillar VVA Oil Line**

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 to be 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:

Section 573.6 Non-Compliance Information Report
FL-471, Caterpillar VVA Oil Line; NHTSA no. 05V-not available
Supplement No.: 01

February 8, 2006

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

(c)(2) Vehicles identification:

Model(s) affected:

Freightliner Trucks – Columbia, Classic, Classic XL, and FLD120SD
Sterling - A-Line, L-Line
Western Star – 4900, 6900