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DEFECT INVESTIGATION

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April 27, 2006

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

06V-151
(2pgs.)

Re: Defect Information Report FL-474, Minotour Floor Reinforcement

Mr. Smith:

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Freightliner LLC herewith reports a safety campaign to recall approximately 87 Thomas Built Minotour buses, manufactured from January 1, 2005 through February 16, 2006.

Attached is Freightliner's Defect 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 27, 2006

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

Brands: Thomas Built Buses

(c)(2) Vehicles identification:

Model(s) affected: Minotour School and Commercial Buses

Manufacture Dates: July 1, 2005 to February 16, 2006

Basis for determining population: Minotours built during above manufacturing dates with a Braun wheelchair lift.

Component manufacturer if other than the vehicle manufacturer:
n/a

(c)(3) Total number of vehicles potentially affected: 87

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

(c)(5) Description of Non-Compliance: The floor structure for the wheelchair lift does not meet the strength requirements of FMVSS 403 for a platform lift system for motor vehicles.
49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: The wheel chair lift may become unstable during operation and cause injury to passengers or bystanders.

(c)(6) Chronology of principal events: In January 2006 a field report cited floor damage from operation of the lift. An investigation revealed that a reinforcement was missing from the floor structure. Lift supplier Braun reconfigured the kits supplied to Thomas Bus, eliminating the reinforcement that is specific to the bus manufacturer.

(c)(7) Noncompliance-test or other data: Noncompliance per FMVSS 403 S6.5.2 Proof Load. The lift must be capable of holding three times the standard load.

(c)(8) Remedial program: Thomas Built Buses Field Service will add the reinforcement at no charge to the owner. Thomas Built Buses 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 30, 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 to ODI review when available.

(c) (11) Manufacturer's campaign number: FL-474