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May 23, 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 (FL-468), NHTSA 06V-006

Mr. Smith:

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Freightliner LLC herewith submits supplemental defect information concerning the steering wheels on Freightliner Century S/T, Columbia and Coronado trucks.

Please contact me if you have any questions.

Sincerely yours,

A handwritten signature in black ink that reads "Timothy Blubaugh". The signature is fluid and cursive, with the first name being more prominent.

Timothy Blubaugh

Cc: Michael Mason, CAL-OSHA
DOSH, Legal Unit
10th Floor
455 Golden Gate Avenue
San Francisco, CA 94102

Certified Mail Article Number: 7003 2260 0001 3403 3998

Section 573.6 Non-Compliance Information Report
FL-468, VIP Steering Wheel NHTSA no. 06V-006
Supplement No.: 4

May 23, 2006

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

(c) (3) Total number of vehicles potentially affected: 1,352
Total number of aftermarket sales: 2,268

(c) (9) Estimated Owner Notification Date: Customer notification by first class mail using Freightliner records was completed May 5, 2006. A copy of the customer letters and work instructions is attached.

Subject: VIP Steering Wheels

Models Affected: Specific Freightliner Century S/T, Columbia, and Coronado vehicles built between October 1, 2000, and January 1, 2005, with certain Vehicle Improvement Products (VIP) steering wheels.

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 2,000 vehicles involved in this campaign.

One or more Huck fasteners securing the steering wheel assembly to the hub may be too short to provide adequate collar engagement on the pin. The steering wheel will feel loose on the hub for a period of time, with the possibility of a complete separation following. Steering wheel separation will result in a loss of steering control and possible vehicle crash.

The steering wheel will be inspected and replaced if a short Huck fastener is found. Fewer than 1% of vehicles are expected to require a replacement.

Additional Repairs

Dealers must complete all outstanding recall 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).

Replacement Parts

Replacement kits are now available and can be obtained by ordering the kit number(s) listed below from your facing Parts Distribution Center. Please see the instructions below and in the Claims for Credit section for instructions.

If our records show your dealership has ordered any vehicles involved in campaign number FL468A-C, a list of the customers and vehicle identification numbers will be available on AccessFreightliner.com. Please refer to this list when ordering parts for this recall.

IMPORTANT: Kits may not be stocked. Very few vehicles will require replacements.

When a replacement is needed, submit a ticket to Warranty Campaigns. You will be asked to e-mail digital photos clearly showing the short Huck fastener(s) to WarrantyCampaigns@Freightliner.com. When you receive an authorization number, please order the appropriate kit with the vehicle serial number. You may include expedited freight on your recall claim when necessary.

Recall Campaign

May 2006
 FL468A-C
 NHTSA #05V-551

Table 1 - Replacement Kits for FL468A-C

Campaign Number	Kit Number	Part Description	Part Number	Qty. per Kit	Suggested Wholesale*
FL468A	25-FL468-000	VIP Steering Wheel	A14-14568-001	1 ea	\$626.02 U S \$937.27 CAN
FL468B	25-FL468-001	VIP Steering Wheel	A14-14568-000	1 ea	\$626.02 U S \$937.27 CAN
FL468C	25-FL468-002	VIP Steering Wheel	A14-14568-002	1 ea	\$550.82 U S \$750.05 CAN

* Please charge all Direct Warranty Customers the above-listed price for the kit, as they are authorized to perform their own Recalls.

Table 1

Removed Parts

Please follow Warranty Failed Parts Tracking shipping instructions for the disposition of all removed parts.

Labor Allowance

Table 2 - Labor Allowance

Campaign Number	Procedure	Time Allowed (hours)	SRT Code	Damage Code
FL468A-C	Inspect steering wheel Huck fasteners	0.1	996-0667A	000-Inspected
FL468A-C	Inspect steering wheel Huck fasteners and remove/replace steering wheel	0.2	996-0667B	000-Modifiedx

Table 2

IMPORTANT: When the recall has been completed, locate the base completion label (Form WAR259) in the appropriate location on the vehicle, write the campaign number on a blank red completion sticker (Form WAR260) and attach it to the base label. 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.

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 (e.g. **FL468A, FL468B, etc.**).
- In the Primary Failed Part Number field, enter **25-FL468-000**.
- In the Parts field, enter the appropriate kit number(s) as shown in the Replacement Parts Table.

IMPORTANT: Kits may not be stocked. Very few vehicles will require replacements.

When a replacement is needed, submit a ticket to Warranty Campaigns. You will be asked to e-mail digital photos clearly showing the short Huck fastener(s) to WarrantyCampaigns@Freightliner.com. When you receive an authorization number, please order the appropriate kit with the vehicle serial number. You may include expedited freight on your recall claim when necessary.

- 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.

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- **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.

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.

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 / 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 (Title 49, United States Code, Chapter 301), 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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Recall Instructions for Aftermarket Parts

Subject: VIP Steering Wheels

Affected Parts

Vehicle Improvement Products (VIP) has informed Freightliner that one or more Huck fasteners used to secure the steering wheel assembly to the hub on certain aftermarket steering wheels may be too short to provide adequate collar engagement on the pin. When installed, the steering wheel may feel loose on the hub for a period of time, with the possibility of a complete separation following. Steering wheel separation will result in a loss of steering control and possible vehicle crash.

Approximately 3,000 aftermarket steering wheels were sold to Freightliner. One percent or fewer of these wheels is expected to have the safety defect. If your dealership has sold any steering wheels with one of the part numbers in **Table 3**, they need to be inspected and replaced, if a short Huck fastener is found. Please follow the instructions below.

Table 3 - Affected Parts

Part Number	Description
A14-14568-000	WHL STRG 450MM, GRAY
A14-14568-001	WHL STRG 450MM, BROWN
A14-14568-002	WHEEL STRG 450MM GRAY

Table 3

Determining and Inspecting Affected Parts

Steering wheels that have been used in repairs at dealerships or sold to customers are part of this recall. Please take following actions.

IMPORTANT: Whenever an aftermarket steering wheel can be associated with the vehicle on which it has been installed, that vehicle will be added to the recall. It will then be inspected and the steering wheel replaced, if needed, by following the regular recall process outlined in this bulletin.

1. If you have used one or more of these steering wheels in a repair performed at your dealership, forward the part number, customer name, full address, and vehicle serial number(s) to Warranty Campaigns. See the instructions for e-mailing information below. These vehicles will be added to the recall.
2. If you have one or more of these steering wheels currently in your parts inventory, inspect the Huck fasteners for the correct length. See the "Steering Wheel Inspection" procedure starting on page 8 of this bulletin (especially **Fig. 2** on page 9).

Those with Huck fasteners of the correct length may be returned to inventory.

If a short Huck fastener is found, the steering wheel is defective and must not be sold. Return the steering wheel to VIP for replacement by following the instructions in the "Returning Affected Parts" section below.

3. If your dealership has sold one or more of these steering wheels, forward the part number, name, address, and vehicle serial number of the customer to Warranty Campaigns. If a steering wheel has not been installed on a vehicle and is defective (one or more short Huck fasteners), see the instructions for returning defective parts to VIP for replacement in the "Returning Affected Parts" section below.

To forward information to Warranty Campaigns:

- Send all information via e-mail to: WarrantyCampaigns@Freightliner.com.
- Subject line: FL468 Aftermarket Parts - Your Dealer Code
- Include all needed information in your e-mail: customer, full address, vehicle serial number, and steering wheel part number.

Returning Affected Parts

When a defective steering wheel has not been installed on a vehicle it must be returned directly to VIP for replacement. Please follow these instructions when returning a defective wheel to VIP.

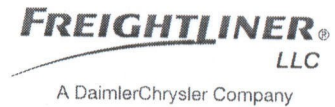
- Ship third party billing using the following UPS account number: 644-367.
- Ship to:

Vehicle Improvement Products
Attention: Kevin Hackeloer
151 Ram Road
Antioch, IL 60002
(847) 395-7255

Include your dealership information for return shipping of the replacement steering wheel.

- Dealer Code
- Contact person with phone number and e-mail address
- Dealership name and shipping address

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FL468A-C
NHTSA #05V-551

Copy of Letter to Owner Subject: VIP Steering Wheels

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

Freightliner LLC, on behalf of its Freightliner Trucks Division, has decided that a defect which relates to motor vehicle safety exists on specific Freightliner Century S/T, Columbia, and Coronado vehicles built between October 1, 2000, and January 1, 2005, with certain Vehicle Improvement Products steering wheels.

One or more Huck fasteners securing the steering wheel assembly to the hub may be too short to provide adequate collar engagement on the pin. The steering wheel will feel loose on the hub for a period of time with the possibility of a complete separation following. Steering wheel separation will result in a loss of steering control and possible vehicle crash.

The steering wheel will be inspected and replaced if a short Huck fastener is found.

Repair kits are now available for authorized dealers to order. Contact your authorized dealer to arrange to have your vehicle(s) inspected. **IMPORTANT:** Your vehicle must be inspected by a dealership to determine whether the steering wheel has short Huck fasteners before a replacement may be ordered.

When you contact your dealer, refer to campaign number **FL468A-C**. The inspection will take approximately half an hour. If your steering wheel requires replacement, one will be ordered for you. Once the kit is received at the dealership, the replacement will take an additional half an hour and will be performed at no charge to you.

IMPORTANT: When the recall has been completed, please ensure that a label has been affixed to your vehicle referencing **FL468A-C**.

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, 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 call the Vehicle Safety Hotline at (888) 327-4236 (TTY: 800-424-9153); or to <http://www.safercar.gov>. 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.

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

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Work Instructions

Subject: VIP Steering Wheels

Models Affected: Specific Freightliner Century S/T, Columbia, and Coronado vehicles built between October 1, 2000, and January 1, 2005, with certain Vehicle Improvement Products (VIP) steering wheels.

Steering Wheel Inspection

IMPORTANT: Kits may not be stocked. Very few vehicles will require replacements.

When a replacement is needed, submit a ticket to Warranty Campaigns. You will be asked to e-mail digital photos clearly showing the short Huck fastener(s) to WarrantyCampaigns@Freightliner.com. When you receive an authorization number, please order the appropriate kit with the vehicle serial number. You may include expedited freight on your recall claim when necessary.

1. Check the base label (Form WAR259) for a completion sticker for FL468 indicating this work has been done. The base label is usually located on the passenger-side door about 12 inches (30 cm) below the door latch.
If a sticker is present, no work needs to be done.
If no sticker is present, go to the next step.
2. Put the front wheels in the straight ahead position. If possible, drive the vehicle in a straight line for a short distance, stopping at the place where the work will be done. Do not turn the steering wheel at any time during the procedure.
3. Park the vehicle on a level surface. Shut down the engine, set the parking brake, and chock the tires.
4. Disconnect the battery.
5. Use a small screwdriver to pry under the edge of the horn button, progressing from your start point around the circumference to keep the button from becoming excessively crooked in the horn holder. See **Fig. 1**. Lift the horn button from the steering wheel assembly.

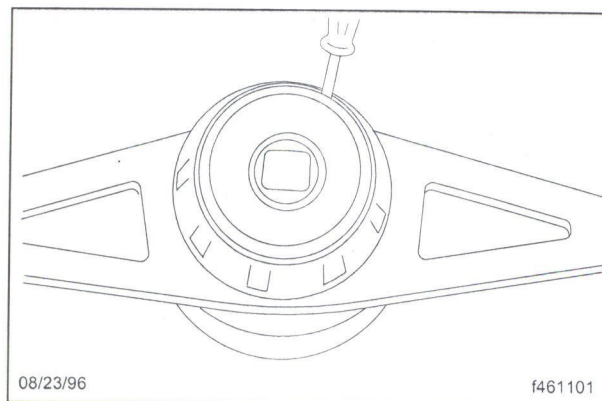


Fig. 1, Prying out the Horn Button

6. Use the tip of your finger to test the three Huck fasteners for proper engagement. A fastener is acceptable when the dark-colored center bolt can be felt with your finger or seen to be at the upper end of the collar. A fastener is not properly engaged when it is felt with your finger or seen to be below the upper end of the collar. See Fig. 2.

If all three Huck fasteners are properly engaged, the steering wheel does NOT need to be replaced. Go to step 7.

If one or more of the Huck fasteners is not properly engaged, the steering wheel needs to be replaced. Take digital photos clearly showing the short Huck fastener(s). Go to "Steering Wheel Replacement" in these Work Instructions.

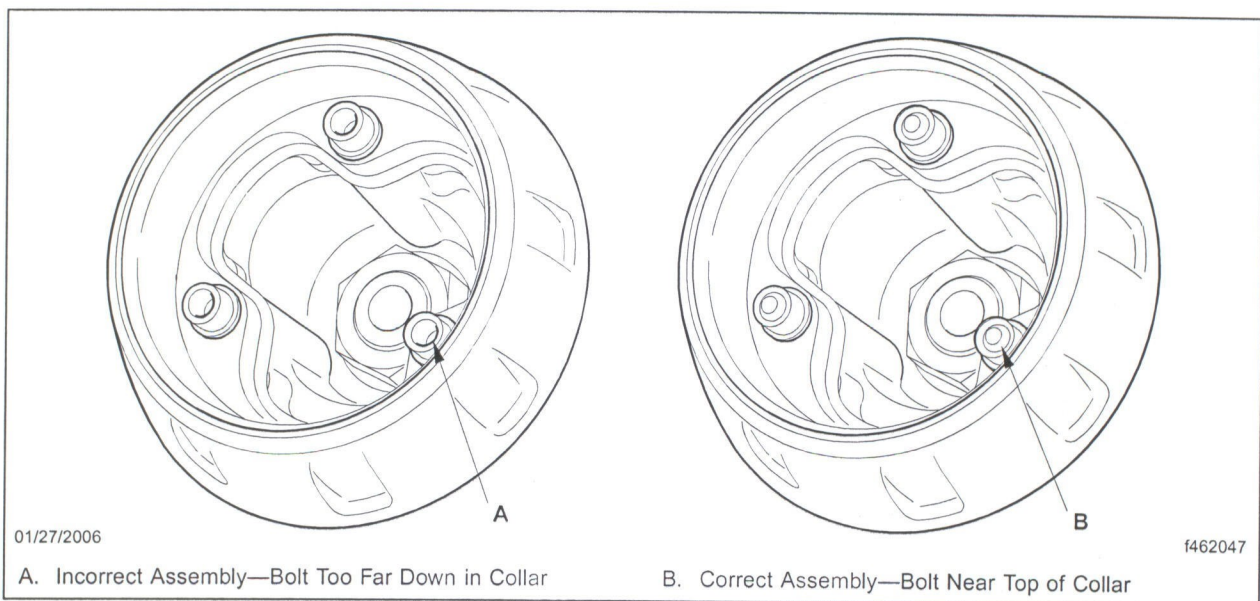


Fig. 2, Huck Fastener Inspection

7. If the steering wheel does not need to be replaced, re-install the horn and reconnect the battery.
8. Clean a spot on the base label (Form WAR259). The base label is usually located on the passenger-side door about 12 inches (30 cm) below the door latch. Write the recall number, FL468, on a blank red completion sticker (Form WAR260) and attach it to the base label.

Steering Wheel Replacement

IMPORTANT: Kits may not be stocked. Very few vehicles will require replacements.

1. Submit a ticket to Warranty Campaigns. You will be asked to e-mail digital photos clearly showing the short Huck fastener(s) to WarrantyCampaigns@Freightliner.com. When you receive an authorization number, order the appropriate kit with the vehicle serial number. (Expedited freight may be included on your recall claim when necessary.)
2. Disconnect the wire terminals while making note of which wire connects to each blade on the horn button.

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3. Remove the wheel nut using a 1-1/4 inch, thin-wall, deep-well socket.

IMPORTANT: After removing the wheel nut, mark the column shaft in alignment with a reliable feature on the wheel to ensure proper alignment of the new wheel.

4. Using a steering wheel puller, two long 1/4-20 bolts to thread into the hub, and a spacer on the top of the steering shaft, remove the steering wheel from the shaft.

IMPORTANT: Be careful when you are removing the steering wheel, or you could damage the horn wires. A steel block measuring approximately 1-5/8 x 5/8 x 1/4 inch (41 x 16 x 6.4 mm) can be used with the puller to protect the wires during steering wheel removal. See Fig. 3.

5. With the reliable feature on the steering wheel (as determined in step 2) aligned with the mark on the column, place the new steering wheel on the steering column. Make sure that the steering wheel is within 10 degrees of center as shown in Fig. 4. Insert the horn ground wires (from the center of the steering column shaft) through the center of the new wheel nut. Install the wheel nut and tighten 55 to 65 lbf ft (75 to 88 N m).

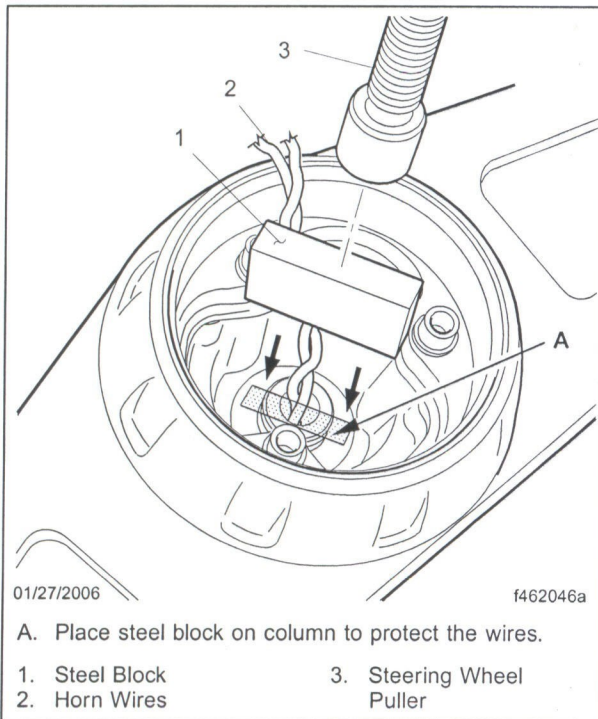


Fig. 3, Steering Wheel Removal

A. Place steel block on column to protect the wires.

- | | |
|----------------|--------------------------|
| 1. Steel Block | 3. Steering Wheel Puller |
| 2. Horn Wires | |

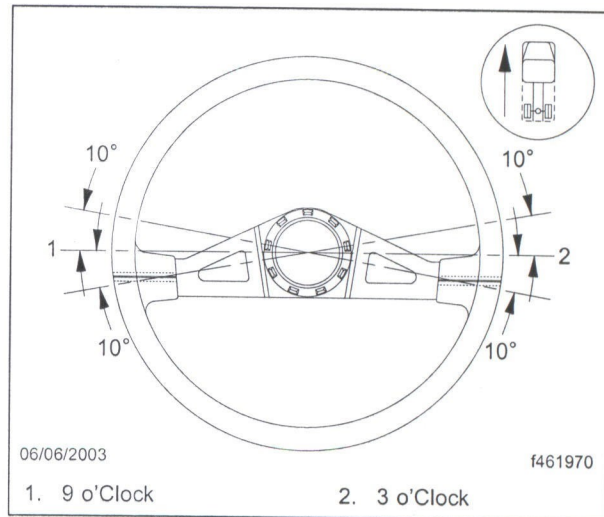


Fig. 4, Steering Wheel Centered

6. Connect the wire terminals to the horn button with the proper orientation. With the steering wheel in the straight-ahead position, push the horn button cover into place on the horn adapter.

7. Connect the batteries and test the horn. If the horn is continuously on, the wires on the button are reversed.

8. Clean a spot on the base label (Form WAR259). The base label is usually located on the passenger-side door about 12 inches (30 cm) below the door latch. Write the recall number, FL468, on a blank red completion sticker (Form WAR260) and attach it to the base label.

9. Remove the chocks from the tires.