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OFFICE OF DEFECTS
INVESTIGATION

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March 26, 2007

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-495, Thomas Built School Bus Seat Belt
Installations**

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 11,265 Thomas Built Minotour, FS65, MVP and HDX school buses built from January 1994 through April 2002 for a defect in the seat belt installation that may cause the seat belt to wear prematurely.

School buses are designed to provide occupant crash protection through 'compartmentalization,' an approach that has been adopted in the federal motor vehicle safety standards. Compartmentalization relies primarily on seat spacing and padded seat backs to protect occupants in the event of a crash and has been proven effective. Thomas Built additionally provides seat belts on large school buses when requested by customers. Freightliner and Thomas Built have decided to conduct this recall to ensure that seat belts, if requested by customers, operate properly and as expected by the customers.

Attached is Freightliner's Defect Information Report.

Please contact me if you have any questions.

Sincerely yours,

Nasser Zamani
Cc: Michael Mason, CAL-OSHA
Enclosure
Certified Mail#70063450000384084578



Defect Information Report

(Section 573.6)

March 26, 2007

(c)(1) **Manufacturer:** Freightliner LLC
P.O. BOX 3849
Portland, Oregon 97208
(503) 745-6910

Brands: Thomas Built Buses

(c)(2) **Vehicles identification:**

Model(s) affected: Minotour, FS-65, MVP-EF, ER, HDX-EF

Model Years affected: 1994 - 2002

Manufacture Dates: 1/23/1994 to 4/15/2002

Basis for determining population: The bus models specified above were built with a metal seat belt retainer bracket.

Component manufacturer if other than the vehicle manufacturer: Not Applicable

(c)(3) **Total number of vehicles potentially affected:** Approximately 1,014 below 10,000 lbs GVWR; Approximately 10,251 above 10,000 lbs GVWR.

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

(c)(5) **Description of the defect:** The seat belt may chafe on the edge of a metal bracket and wear prematurely.

(c)(6) **Chronology of principal events:** In 1994, in response to a customer request, Thomas Built began installing a sheet metal bracket that prevents passengers from pushing the seat belts between the seat base and seat back. In November 2006, an inspection found seat belts frayed from chafing on the bracket on a number of Minotour school buses in one fleet. Thomas Built field inspections showed mild abrasion of seat belts in other vehicles.

(c)(7) **Noncompliance-test or other data:** Not Applicable

(c)(8) **Remedial program:** All seat belts will be inspected. Those found to be damaged from chafing will be replaced. The seat belt retainer strip will either be replaced or modified to prevent future chafing. Repairs will be performed by Freightliner or Thomas Built dealerships and Direct Warranty customers, i.e., customers approved to do their own warranty repairs. Dealers will be notified by May 21, 2007.

Estimated Owner Notification Date: Customer notification will be by first class mail using Freightliner and Thomas Bus records to determine the customers affected. This will be completed approximately May 25, 2007.

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-495