



**07V-250**  
**(2 pages)**  
Nasser Zamani  
Manager  
Compliance and Regulatory Affairs

10 JUN 13 14 32  
PH

Freightliner LLC  
4747 N. Channel Ave  
Portland, OR 97217-7699  
503-745-6910 Phone  
503-745-5544 Fax  
NasserZamani@Freightliner.com

June 8, 2007

Dan Smith  
Associate Administrator for Vehicle Safety  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590

**Re: Noncompliance Information Report FL-498, Saf-T-Liner C2 FMVSS No. 301**

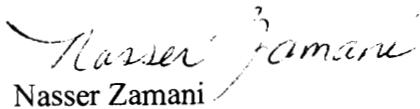
Mr. Smith:

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Freightliner LLC herewith reports a noncompliance campaign to recall approximately 6,880, Thomas Built Buses, Saf-T-Liner C2 vehicles, manufactured December 1, 2003 through October, 10, 2006 with a potential noncompliance in the fuel system.

Attached is Freightliner's Noncompliance Information Report.

Please contact me if you have any questions.

Sincerely yours,

  
Nasser Zamani

Cc: Michael Mason, CAL-OSHA  
Enclosure  
Certified Mail# 7002 3150 0004 1405 1027

## Noncompliance Information Report

(Section 573.6)

June 8, 2007

**(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:** Saf-T-Liner C2

**Model Years affected:** 2005, 2006 & 2007

**Manufacture Dates:** 12/01/2003 through 10/10/2006

**Basis for determining population:** All Saf-T-Liner C2 vehicles built per fuel fill tube installation diagram 114537

**Component manufacturer if other than the vehicle manufacturer:** Not Applicable

**(c)(3) Total number of vehicles potentially affected:** Approximately 6,880

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

**(c)(5) Description of the defect:** On affected vehicles, fasteners used to secure the fuel fill tube mounting bracket to the bus floor may be missing or improperly installed. Vehicles with missing or improperly installed fuel fill tube mounting bracket fasteners may not comply with the fuel system integrity requirements of FMVSS No. 301.

**49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety:** Failure to comply with the fuel system integrity requirements of FMVSS No. 301 could result in fuel spillage during or after a vehicle crash potentially resulting in a fire and personal injury.

**(c)(6) Chronology of principal events:** Not Applicable

**(c)(7) Noncompliance-test or other data:** Freightliner received a preliminary report that a Saf-T-Liner C2 vehicle tested by the NHTSA had failed to meet the requirements of FMVSS No. 301, S5.5. Initial findings indicated that two fasteners designed to hold the fuel fill tube in place may not have been properly installed. In late April 2007 the fuel fill tube mounting was evaluated on approximately eighty C2 vehicles. On May 17, 2007, a FMVSS 301 contoured barrier crash test validated the theory that improperly installed fasteners were the root cause of the NHTSA test subject's failure to meet the fuel system integrity requirements.

**(c)(8) Remedial program:** Potentially affected buses will be inspected to ensure proper installation of the fuel fill tube mounting bracket fasteners. Missing or incorrectly installed fasteners will be replaced. Repairs will be performed by Thomas Bus dealerships and Direct Warranty customers, i.e., customers approved by Thomas Bus to do their own warranty repairs. - **Estimated dealer notification date** – July 30, 2007

**Estimated Owner Notification Date:** Customer notification will be by first class mail using Freightliner records to determine the customers affected. This will be completed approximately August 3, 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-498