



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

June 19, 2008

MR. NASSER ZAMANI
MANAGER, COMPLIANCE AND
REGULATORY AFFAIRS
DAIMLER TRUCKS NORTH AMERICA LLC
4747 N. CHANNEL AVENUE
PORTLAND, OR 97217-7699

NVS-215paw
08V-270

SUBJECT: FMVSS 108/HEADLIGHT HEIGHT

DEAR MR. ZAMANI:

This letter serves to acknowledge Daimler Trucks North America LLC's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety noncompliance with Federal Motor Vehicle Safety Standard No. 108, "Lamps, Reflective Devices, and Associated Equipment," in the products described below for which a safety recall campaign shall be conducted pursuant to 49 U.S.C. § 30119.

Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

DAIMLER TRUCKS/BUSINESS CLASS M2/2008-2009

NHTSA Campaign Number: 08V-270

Mfg's Report Date: June 6, 2008

Components: EXTERIOR LIGHTING: HEADLIGHTS

Potential Number of Units Affected: 160

Summary:

DAIMLER TRUCKS IS RECALLING 160 MY 2008-2009 BUSINESS CLASS M2 106 ALL WHEEL DRIVE VEHICLES EQUIPPED WITH CUMMINS ISC ENGINES AND HIGHWAY HOODS. THESE VEHICLES FAIL TO CONFORM TO THE REQUIREMENTS OF FEDERAL MOTOR VEHICLE SAFETY STANDARD NO. 108, 'LAMPS, REFLECTIVE DEVICES, AND ASSOCIATED EQUIPMENT.' THE HEADLIGHTS MEASURE GREATER THAN 54" FROM THE ROAD SURFACE WHICH DOES NOT MEET THE STANDARD REQUIREMENTS.

Consequence:

IMPROPER HEIGHT ON THE HEADLIGHTS MAY NOT FULLY ILLUMINATE ROAD SURFACE OR MAY INHIBIT THE ABILITY OF MOTORISTS TO SEE VEHICLES WHICH CAN INCREASE THE RISK OF A CRASH.

Remedy:

DAIMLER TRUCKS HAS NOT YET PROVIDED A REMEDY FOR THIS CAMPAIGN. THE RECALL IS EXPECTED TO BEGIN ON OR ABOUT AUGUST 8, 2008. OWNERS MAY CONTACT DAIMLER TRUCKS AT 1-800-547-0712.

Notes:

DAIMLER TRUCKS RECALL NO. FL-531. CUSTOMERS MAY ALSO CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S VEHICLE SAFETY HOTLINE AT 1-888-327-4236 (TTY 1-800-424-9153), OR GO TO [HTTP://WWW.SAFERCAR.GOV](http://www.safercar.gov).

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

The information in your noncompliance report appears to satisfy the requirements of 49 CFR 573.6 except for the following items:

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

Please provide us with the details of the remedy for this recall.

Please provide the following additional information and be reminded of the following requirements:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on or before 30 days after the close of the calendar quarter.

Your contacts for this recall will be Pat Wallace or Delia Lopez, who may be reached by phone at 202-366-5232 or 202-366-9525 or by email at Patricia.wallace@dot.gov, Delia.lopez@dot.gov, or through the office email at RMD.ODI@dot.gov. We look forward to working with you for successful completion of this recall campaign.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Person', with a stylized, cursive script.

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement