

DAIMLER

February 20, 2008



Daimler Trucks North America
Nasser Zamani
Manager
Compliance and Regulatory Affairs

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

08V-085
(2 pages)

Re: Defect Information Report FL-523, M2 106V Reflex Reflectors

Mr. Smith

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Daimler Trucks North America LLC herewith reports a safety campaign to recall approximately 2,000 Freightliner M2 106 Vocational models manufactured July 7, 2004 to January 28, 2008 for a noncompliance with the front side reflector requirements of FMVSS 108.

Attached is Daimler Trucks North America's Defect Information Report.

Please contact me if you have any questions.

Sincerely yours,

A handwritten signature in cursive script that reads "Nasser Zamani".

Nasser Zamani

Cc: Michael Mason, CAL-OSHA
Enclosure
Certified Mail# 7003 2260 0001 3403 6838

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Defect Information Report

(Section 573.6)

Date: February 20, 2008

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

Brands: Freightliner

(c)(2) Vehicles identification:

Model(s) affected: Business Class M2 106 Vocational

Model Years affected: 2005 through 2008

Manufacture Dates: July 7, 2004 to January 28, 2008

Basis for determining population: All M2 106Vs manufactured July 7, 2004 to January 28, 2008

Component manufacturer if other than the vehicle manufacturer: Not Applicable

(c)(3) Total number of vehicles potentially affected: Approximately 2,000

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

(c)(5) Description of the defect: Freightliner's Business Class M2 106V did not have front side reflex reflectors installed per FMVSS 108.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: Under certain conditions during darkness, visibility of the truck may be impaired and a crash may occur.

(c)(6) Chronology of principal events: In mid-January, a final stage manufacturer advised Daimler Trucks North America that they had received certain trucks without the front side reflectors. Engineering determined that the reflectors on the M2106V model had been inadvertently omitted during design. Trucks on hand were put on hold to install reflectors.

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

(c)(8) Remedial program: Reflectors will be added to the hood to comply with FMVSS 108. Repairs will be performed by Freightliner Trucks dealerships and direct warranty customers, i.e., customers approved by Daimler Trucks North America to do their own warranty repairs. Dealers will be notified approximately April 18, 2008.

Estimated Owner Notification Date: Customer notification will be by first class mail using Daimler Trucks North America records to determine the customers affected. This will be completed approximately April 18, 2008.

Reimbursement Plan: Copies will be submitted as a supplemental report when available.

(c)(9) Information for tire recalls: Not Applicable

(c)(10) Communications sent to dealers and owners: Copies will be submitted as a supplemental report when available.

(c)(11) Copy of proposed owner notification letter: A draft will be sent for ODI review when available.

(c)(12) Manufacturer's campaign number: FL-523