

DAIMLER



June 6, 2008

Daimler Trucks North America
Nasser Zamani
Manager
Compliance and Regulatory Affairs

Dan Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue S.E.
Washington D.C. 20590

08V-270
(2 pages)

Re: Defect Information Report FL-531, M2 Headlight Height

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 160 Freightliner Business Class M2 vehicles equipped with all wheel drive, Cummins ISC engines, and highway hoods, manufactured August 15, 2007 through May 16, 2008 that may not conform with the headlight height 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# 7004 2890 0004 1202 2014

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Defect Information Report (Section 573.6)

Date: June 6, 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

Model Years affected: 2008, 2009

Manufacture Dates: August 15, 2007 through May 16, 2008

Basis for determining population: All wheel drive Business class M2 106 vehicles with Cummins ISC engines and highway hoods

Component manufacturer if other than the vehicle manufacturer: Not applicable

(c)(3) **Total number of vehicles potentially affected:** Approximately 160

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

(c)(5) **Description of the defect:** All wheel drive Business Class M2 106 trucks with Cummins ISC engines may have headlights which measure greater than 54" from the road surface. Federal Motor Vehicle Safety Standard 49CFR571.108(\$5.3) requires headlights to be not less than 22 inches, nor more than 54 inches above road surface.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: Improper height on headlights may not fully illuminate road surface or may inhibit the ability of motorists to see vehicles. This can increase the risk of traffic accidents that may result in injury or death.

(c)(6) **Chronology of principal events:** A customer contacted Daimler Trucks North America after measuring headlight height on several new vehicles at 57". Engineering reviewed the headlight height calculations and determined some M2 106 vehicles may not meet FMVSS 108 requirements.

(c)(7) **Noncompliance-test or other data:** No test was necessary in determining the noncompliance of headlight height. On May 30, 2008 DTNA engineering reviewed headlight calculations with current dimensions and determined some vehicles may not comply with FMVSS 108.

(c)(8) **(i) Remedial program:** DTNA will provide details of the repair when the modification is defined. Repairs will be performed by Daimler Trucks North America dealerships and Direct Warranty customers, i.e., customers approved by Daimler Trucks North America to do their own warranty repairs

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

(ii) Estimated Owner and Dealer 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 August 8, 2008.

Dealer notification will be completed approximately August 8, 2008.

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

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

(c)(11) **Manufacturer's campaign number:** FL-531