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Daimler Trucks North America
Nasser Zamani
Senior Manager
Compliance and Regulatory Affairs

November 17, 2008

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

**Re: Defect Information Report FL-538,
Air Management Unit Pressure Switch A on Bus Chassis**

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 16,000 FCCC B2 School bus chassis, S2 Shuttle bus chassis, and Thomas Built Buses Saf-T-Liner C2 School Buses and non-school buses equipped manufactured March 2005 through May 2008 with a defect in the Air Management Unit Pressure Switch A module.

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

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Michael Mason, CAL-OSHA

Enclosure

Certified Mail# 7003 2260 0001 3403 7583

A Daimler Company

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Defect Information Report

(Section 573.6)

November 17, 2009

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

Brands: Freightliner Custom Chassis, Thomas Built Buses

(c)(2) Vehicles identification:

Model(s) affected: FCCC B2 School bus chassis and S2 Shuttle bus chassis
Thomas Saf-T-Liner C2 School Bus, Saf-T-Liner C2 non-school bus

Model Years affected: 2005, 2006, 2007, 2008, 2009

Manufacture Dates: March 2005 through May 2008

Basis for determining population: Affected models manufactured March 2005 through May 2008 with an air management unit (AMU) air pressure switch A, part number A12-19776-#.

Component manufacturer if other than the vehicle manufacturer:

Norgren Inc.
5400 S. Delaware St.
Littleton, CO 80120-1663
303/794-5000

(c)(3) Total number of vehicles potentially affected: Approximately 16,000

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

(c)(5) Description of the defect: The contacts in the pressure switch for the low current brake lamp signal to the chassis ECU may become contaminated by the presence of silicone used during assembly at the AMU supplier. Over time, insulating deposits may build up on the contacts and affect the operation of the brake lamp signal to the chassis ECU.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety:

The insulating deposits built up over time may prevent the brake lamps from operating. Inoperative brake lamps would not provide a signal that the brakes are applied to other traffic and a crash may occur.

(c)(6) Chronology of principal events:

The A12-19776-# pressure switch A assembly was introduced in production in 2003 as a component of the Air Management Unit (AMU). The AMU assembly provides the interface between the pneumatic and electrical systems in the B2 school bus chassis. Norgren changed suppliers for the internal switch in March 2005 and changed the compound used in the assembly to eliminate silicone from production in May 2008.

In late 2007, Thomas Built Buses began to receive complaints from school bus fleets about erratic operation of brake lamps, wheelchair lifts and park brake interlocks caused by the AMU. The brake lamp signal from the Chassis ECU is also used in the control systems for certain wheel chair lifts and optional park brake interlocks. In January 2008, FCCC Service, DTNA Engineering, and Norgren initiated an investigation to analyze problems with the PSA and determine potential field fixes. Testing determined that contamination from the presence of silicone used during assembly and switch bounce during operation of the switch may cause insulating deposits to form on the contacts. In October 2008, NHTSA advised that they had received reports of erratic brake lamp and park brake interlock operation from school bus customers.

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- (c)(7) **Noncompliance-test or other data:** not applicable
- (c)(8) **(i) Remedial program:** The Pressure Switch A module in the AMU will be replaced. Repairs will be performed by Daimler Trucks North America dealerships, Thomas Built Bus 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 January 16, 2009. Dealer notification will be completed approximately January 16, 2009.
- (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-538