

DAIMLER



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

September 1, 2009

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

**Re: Defect Information Report – Supplemental Report No. 6
08V-270, FL-531, M2 AWD Headlight Height**

Mr. Smith

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Daimler Trucks North America LLC herewith submits supplemental defect information and copies of documents distributed to dealers and purchasers.

- (c)(3) Total number of vehicles potentially affected: 172**
- (c) (8)(ii) Communications sent to dealers: posted July 31, 2009**
Communications sent to owners: mailed August 10, 2009
- (c) (10) Copies of Communications sent to owners and dealers are attached.**

Please contact me if you have any questions.

Sincerely yours,

Nasser Zamani

Cc: Michael Mason, CAL-OSHA
Enclosure
Certified Mail# 7002 3150 0004 1405 4677

A Daimler Company

Daimler Trucks North America LLC
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July 2009
FL531A
NHTSA #08V-270

Subject: Business Class M2 Headlight Height

Models Affected: Specific Freightliner All-Wheel Drive Business Class M2 vehicles and All-Wheel Drive Business Class M2 Sportchassis vehicles built with Cummins ISC engines manufactured August 15, 2007 through March 25, 2009.

General Information

Daimler Trucks North America LLC, on behalf of its Freightliner Trucks Division, has decided that the vehicles mentioned above fail to conform to Federal Motor Vehicle Safety Standard (FMVSS) No. 108(5.3), Lamps, Reflective Devices, and Associated Equipment.

There are approximately 200 vehicles involved in this campaign.

Certain vehicles may have been built with headlights which measure greater than 54 inches 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 the road surface. Improper height on headlights may not fully illuminate the 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.

The headlight height will be lowered to less than or equal to 54 inches. **NOTE: Kits must be ordered with the vehicle serial number and must be received prior to the arrival of a vehicle at your dealership. Expedited freight for kits may not be included on claims as all arrangements are to be made in advance.**

Additional Repairs

Dealers must complete all outstanding recall and field service campaigns prior to the sale or delivery of a vehicle. A Dealer will be liable for any progressive damage that results from its failure to complete campaigns before sale or delivery of a vehicle.

Owners may be liable for any progressive damage that results from its failure to complete campaigns within a reasonable time after receiving notification.

Work Instructions

Please refer to the attached work instructions. Prior to performing the campaign, check the vehicle for a completion sticker (Form WAR260).

Replacement Parts

Replacement kits are now available and can be obtained by ordering the kit number(s) listed below from your facing Parts Distribution Center. **Kits must be ordered with the vehicle serial number and must be received prior to the arrival of a vehicle at your dealership. Expedited freight for kits may not be included on claims as all arrangements are to be made in advance.**

If our records show your dealership has ordered any vehicles involved in campaign number FL531A, a list of the customers and vehicle identification numbers will be available on AccessFreightliner.com. Please refer to this list when ordering parts for this recall.

Table 1 - Replacement Parts for FL531A

IMPORTANT: Kits must be ordered with the vehicle serial number and must be received prior to the arrival of a vehicle at your dealership. Expedited freight for kits may not be included on claims as all arrangements are to be made in advance.

Recall Campaign

Daimler Trucks
North America LLC

July 2009
FL531A
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NOTE: Center spring bolts for 12K and 14.6K / 16K suspensions are included in the kit. Please use the appropriate length bolts for the vehicle. You will only use one set of bolts for this repair. The other set will not be used.

Campaign Number	Kit Number	Part Description	Part Number	Qty. per Kit	Suggested Wholesale*
FL531A	25-FL531-000	Oil Pan	CUM 4994972	1 ea	\$5,600.16 U.S. \$6,272.18 CAN
		Oil Pan Gasket	CUM 3938160	1 ea	
		Dipstick Assembly	CUM 5260645	1 ea	
		Draglink	14-17300-000	1 ea	
		Pitman Arm	14-16836-000	1 ea	
		Pitman Arm Pinch Bolt	23-09447-400	1 ea	
		Pitman Arm Nut	23-13179-212	1 ea	
		Pitman Arm Washer	23-09114-004	1 ea	
		Gear Poppet Adjuster Screw	RGT 021407X1	1 ea	
		12K Center Spring Bolt (2.26")	HDR 05069010	2 ea	
		14.6K /16K Center Spring Bolt	HDR 05069012	2 ea	
		Center Spring Nut	HDR 37774	2 ea	
		U-Bolt (LH)	23-12870-310	2 ea	
		U-Bolt (RH)	23-12870-370	2 ea	
		Sealant	CUM 3164067	1 ea	
		Completion Sticker	WAR260	1 ea	

* Please charge all Direct Warranty Customers the above-listed price for the kit, as they are authorized to perform their own Recalls.

Table 1

Removed Parts

Please follow Warranty Failed Parts Tracking shipping instructions for the disposition of all removed parts.

Labor Allowance

Table 2 - Labor Allowance

Campaign Number	Procedure	Time Allowed (hours)	SRT Code	Damage Code
FL531A	Remove suspension shims and lower headlight height	5.1	996-0771A	000-Modifiedx

Table 2

IMPORTANT: When the recall has been completed, locate the base completion label in the appropriate location on the vehicle, and attach the red completion sticker provided in the recall kit (Form WAR260). If the vehicle does not have a base completion label, clean a spot on the appropriate location of the vehicle and first attach the base completion label (Form WAR259). If a recall kit is not required or there is no completion sticker in the kit, write the recall number on a blank sticker and attach it to the base completion label.

Claims for Credit

You will be reimbursed for your parts, labor, and handling by submitting your claim through the Warranty system within 30 days of completing this campaign. Please reference the following information in QuickClaim®:

- Claim type is **Recall**.
- In the FTL Authorization field, enter the campaign number and appropriate condition code (**FL531A**).
- In the Primary Failed Part Number field, enter **25-FL531-000**.
- In the Parts field, enter the appropriate kit number(s) as shown in the Replacement Parts Table. **IMPORTANT: Kits must be ordered with the vehicle serial number and must be received prior to the arrival of a vehicle at your dealership. Expedited freight for kits may not be included on claims as all arrangements are to be made in advance..** NOTE: Center spring bolts for 12K and 14.6K / 16K suspensions are included in the kit. Please use the appropriate length bolts for the vehicle. You will only use one set of bolts for this repair. The other set will not be used.
- In the Labor field, first enter the appropriate SRT from the Labor Allowance Table. For administrative time, enter SRT 939-0010A for 0.3 hours.
- **Reimbursement for Prior Repairs.** When a customer asks about reimbursement, please do the following.
 - Accept the documentation of the previous repair.
 - Make a brief check of the customer's paperwork to see if the repair may be eligible for reimbursement. (See the "Copy of Owner Letter" section of this bulletin for reimbursement guidelines for this recall.)
 - Contact the Warranty Campaigns Department for a decision and authorization number.
 - Include the approved amount on your claim in sublet/outside purchases.
 - In the claim story, first note the authorization number and that the claim includes a reimbursement request.
 - Retain the documentation and provide it to Warranty Campaigns or Claims Processing if requested.
 - When your claim is paid, reimburse the customer the appropriate amount.

IMPORTANT: ServicePro® must be viewed prior to performing the recall to ensure the vehicle is involved and the campaign has not been previously completed. Also, check for a completion sticker prior to beginning work.

Contact the Warranty Campaigns Department at (800) 547-0712, from 7:00 a.m. to 4:00 p.m. Pacific Time, Monday through Friday, Web inquiry at AccessFreightliner.com / Support / Submit an Inquiry, or the Customer Assistance Center at (800) 385-4357, after normal business hours, if you have any questions or need additional information.

To return excess kit inventory related to this campaign, U.S. dealers must submit a Parts Authorization Return (PAR) to the Memphis PDC. Canadian dealers must submit a PAR to their facing PDC. All kits must be in resalable condition. PAR requests must include the original purchase invoice number.

The letter notifying vehicle owners is included for your reference.

Please note that the National Traffic and Motor Vehicle Safety Act, as amended (Title 49, United States Code, Chapter 301), requires the owner's vehicle(s) be corrected within a reasonable time after parts are available to you. The Act states that failure to repair a vehicle within 60 days after tender for repair shall be prima facie evidence of an unreasonable time. However, circumstances of a particular situation may reduce the 60 day period. Failure to repair a vehicle within a reasonable time can result in either the obligation to (a) replace the vehicle with an identical or reasonably equivalent vehicle, without charge, or (b) refund the purchase price in full, less a reasonable allowance for depreciation. The Act further prohibits dealers from selling a vehicle unless all outstanding recalls are performed. Any lessor is required to send a copy of the recall notification to the lessee within 10 days. Any subsequent stage manufacturer is required to forward this notice to its distributors and retail outlets within five working days.

Recall Campaign

Daimler Trucks
North America LLC

July 2009
FL531A
NHTSA #08V-270

Copy of Letter to Owner

Subject: Business Class M2 Headlight Height

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. This notice is also sent in accordance with the Canadian Motor Vehicles Safety Act.

Daimler Trucks North America LLC, on behalf of Freightliner Trucks Division, has decided that specific Freightliner All-Wheel Drive Business Class M2 vehicles and All-Wheel Drive Business Class M2 Sportchassis vehicles manufactured August 15, 2007 through March 25, 2009 may fail to conform to Federal Motor Vehicle Safety Standard (FMVSS) No. 108(5.3), Lamps, Reflective Devices, and Associated Equipment.

Certain vehicles may have been built with headlights which measure greater than 54 inches 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 the road surface. Improper height on headlights may not fully illuminate the 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.

The headlight height will be lowered to less than or equal to 54 inches.

Parts are now available for authorized dealers to order. **IMPORTANT: Please contact your authorized dealer in advance so that replacement parts for the recall can be ordered and available prior to your arrival.** To locate a dealer, search online at www.FreightlinerTrucks.com or contact the Warranty Campaigns Department for assistance.

When you contact your dealer, refer to campaign number **FL531A**. Once kit(s) are received at the dealership, the Recall will take approximately five hours and will be performed at no charge to you.

IMPORTANT: When the Recall has been completed, please ensure that a label has been affixed to your vehicle referencing **FL531A**.

If you do not own the vehicle that corresponds to the identification number(s) which appears on the Recall Notification, please return the notification to the Warranty Campaigns Department with any information you can furnish that will assist us in locating the present owner. If you have leased this vehicle, Federal law requires that you forward this notice to the lessee within 10 days. If you are a subsequent stage manufacturer, Federal law requires that you forward this notice to your distributors and retail outlets within five working days. If you have paid to have this recall condition corrected prior to this notice, you may be eligible to receive reimbursement. Please see the reverse side of this notice for details.

If you are not able to have the defect remedied without charge and within a reasonable time, which is not longer than 60 days after you tender the vehicle for repair, please contact the Warranty Campaigns Department at (800) 547-0712, 7:00 a.m. to 4:00 p.m. Pacific Time, Monday through Friday, e-mail address DTNA.Warranty.Campaigns@Daimler.com, or the Customer Assistance Center at (800) FTL-HELP or (800) STL-HELP, after normal business hours. You may also wish to submit a complaint to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, SE., Washington, DC 20590; or call the Vehicle Safety Hotline at (888) 327-4236 (TTY: 800-424-9153); or to <http://www.safercar.gov>. If your vehicle is involved in the Canadian portion, you may wish to notify Transport Canada, ASFAD, Place de Ville Tower C, 330 Sparks Street, Ottawa, ON K1A 0N5, or phone (800) 333-0510.

We regret any inconvenience this action may cause but feel certain you understand our interest in motor vehicle safety.

WARRANTY CAMPAIGNS DEPARTMENT

Enclosure

**Reimbursement to Customers for Repairs
Performed Prior to Recall**

If you have already **paid** to have this recall condition corrected you may be eligible to receive reimbursement.

Requests for reimbursement may include parts and labor. Reimbursement may be limited to the amount the repair would have cost if completed by an authorized Daimler Trucks North America LLC dealer. The following documentation must be presented to your dealer for consideration for reimbursement.

Please provide original or clear copies of all receipts, invoices, and repair orders that show:

- The name and address of the person who paid for the repair.
- The Vehicle Identification Number (VIN) of the vehicle that was repaired.
- What problem occurred, what repair was done, when the repair was done.
- Who repaired the vehicle.
- The total cost of the repair expense that is being claimed.
- Proof of payment for the repair (such as the front and back of a cancelled check or a credit card receipt).

Reimbursement will be made by check from your Daimler Trucks North America LLC dealer.

Please speak with your Daimler Trucks North America LLC authorized dealer concerning this matter.