



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

June 1, 2009

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-552, Thomas Built Buses
Emergency Exit Window Release Mechanism**

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 216 Thomas Built Buses Minotour school buses equipped with a specific combination of high back seats, window style, and seat/window location, manufactured February 5, 2003 through July 3, 2008 with emergency exit release mechanisms which may not be located per the requirements of FMVSS 217 § S5.3.3.2(a)(1).

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# 7006 3450 0003 8408 4929

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OFFICE OF DEFECTS
INVESTIGATION

DAIMLER

Defect Information Report (Section 573.6)

June 1, 2009

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

Brands: Thomas Built Buses

(c)(2) **Vehicles identification:**

Model(s) affected: Minotour School Buses

Model Years affected: 2004 through 2009

Manufacture Dates: February 5, 2003 through July 3, 2008

Basis for determining population: Specific combination of high back seat, window, and seat/window location.

Component manufacturer if other than the vehicle manufacturer: Not Applicable

(c)(3) **Total number of vehicles potentially affected:** Approximately 216

(c)(4) **Percentage of vehicles estimated to contain the defect:** 20%

(c)(5) **Description of the defect or noncompliance:** Vehicles with certain seat back and window combinations may be configured such that the emergency window release mechanism is located outside of the low-force region specified by FMVSS 217 § S5.3.3.2(a)(1).

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: In the event of an emergency evacuation, improperly located emergency exit release mechanisms may delay evacuation and increase the risk of personal injury to vehicle occupants.

(c)(6) **Chronology of principal events:** Not Applicable

(c)(7) **Noncompliance test or other data:** Testing was performed by measuring the distance between the release mechanism low force application point and the portion of the seat back nearest to that point. July 2008, internal audit identified potential release mechanism clearance issue. July 2008 – May 2009, study of release mechanisms with various seat types, window types, and seat and window locations conducted to ensure compliance with FMVSS 217 § S5.3.3.2(a)(1). May 2009, suspect population identified.

(c)(8) (i) **Remedial program:** Remedial program details will be submitted as a supplemental report when available. 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 7, 2009

Dealer notification will be completed approximately August 7, 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-552