

DAIMLER

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

October 27, 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. 2
09V-355, FL-554, TRW I-GEN 3 Steering Shaft**

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: 1505**
- (c) (8)(ii) Communications sent to dealers: posted October 23, 2009**
Communications sent to owners: will be mailed November 6, 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#70032260000134203322

A Daimler Company

Daimler Trucks North America LLC
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Subject: TRW IGEN 3 Steering Shaft Welds

Models Affected: Specific Freightliner Business Class M2 vehicles and Freightliner Custom Chassis B2 school bus chassis (Thomas Built Buses Saf-T-Liner C2) and S2 shuttle bus chassis manufactured April 21, 2009, through July 6, 2009, with certain TRW steering shafts.

General Information

Daimler Trucks North America LLC, on behalf of its Freightliner Trucks Division, and its wholly owned subsidiary, Freightliner Custom Chassis Corporation, has decided that a defect that relates to motor vehicle safety exists on the vehicles mentioned above.

There are approximately 1,900 vehicles involved in this campaign.

A weld on certain TRW IGEN 3 steering shafts that secures the spline tube to the intermediate tube may be mislocated (i.e., not fully over the seam created when the tubes are pressed together). An improperly located weld bead has the potential to reduce the ultimate torsional and axial load capacity of the joint below acceptable levels. A failed steering shaft could cause loss of vehicle control and result in a possible vehicle crash.

The welds will be inspected. If the weld is found to be improperly located, the steering shaft will be replaced. It is estimated that 5 percent or fewer steering shafts will require replacement.

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.

Important Parts Information

- It is estimated that 5 percent or fewer steering shafts will require replacement. When needed, freight charges may be included on recall claims with prior authorization. Submit a CampaignPreApproval inquiry with the freight invoice attached for consideration. When replacing a steering shaft assembly, the steering pinch bolt and nut may be claimed without additional authorization.
- TRW is shipping the inspection gauge required for this recall directly to dealerships. If there are any questions about the gauge or a replacement is needed, contact TRW at email address col194.campaign@TRW.com. Please include "DTNA Recall FL554" in the subject line.

If our records show your dealership has ordered any vehicles involved in campaign number FL554A-I, 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.

Recall Campaign

Daimler Trucks
North America LLC

October 2009
FL554A-I
NHTSA #09V-355

Table 1 - Replacement Parts for FL554

NOTE: Install a steering shaft assembly only when a weld fails the inspection. Five percent or fewer vehicles are expected to have suspect welds.

25-FL554-000 through 25-FL554-008

Campaign Number	Kit Number	Part Description	Part Number	Qty. per Kit	Suggested Wholesale*
FL554A	25-FL554-000	I-SHAFT,STRG,TRW,I-G	14-17013-007	1 ea	\$266.63 U.S. \$292.10 CAN
FL554B	25-FL554-001	I-SHAFT,STRG,TRW,I-G	14-17014-002	1 ea	\$334.75 U.S. \$298.88 CAN
FL554C	25-FL554-002	I-SHAFT,STRG,TRW,I-G	14-17014-005	1 ea	\$261.37 U.S. CAN Not Available
FL554D	25-FL554-003	I-SHAFT,STRG,TRW,I-G	14-17786-000	1 ea	\$260.80 U.S. \$292.10 CAN
FL554E	25-FL554-004	I-SHAFT,STRG,TRW,I-G	14-17013-006	1 ea	\$109.32 U.S. \$118.81 CAN
FL554F	25-FL554-005	I-SHAFT,STRG,TRW,I-G	14-17014-017	1 ea	\$258.83 U.S. CAN Not Available
FL554G	25-FL554-006	I-SHAFT,STRG,TRW,I-G	14-17014-008	1 ea	\$258.83 U.S. CAN Not Available
FL554H	25-FL554-007	I-SHAFT,STRG,TRW,I-G	14-17013-008	1 ea	\$266.63 U.S. \$292.10 CAN
FL554I	25-FL554-008	I-SHAFT,STRG,TRW,I-G	14-17013-009	1 ea	\$109.32 U.S. \$118.81 CAN

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

Table 1

Table 2 - Replacement Parts for FL554A-I

NOTE: The pinch bolt and nut are needed only when a steering shaft assembly is replaced.

Steering Pinch Bolt and Nut

Campaign Number	Kit Number	Part Description	Part Number	Qty.	Suggested Wholesale*
FL554A-I	N/A	BOLT-PINCH,STRG UJOI	14-15639-000	2 ea	\$4.64 U.S. \$5.20 CAN
		NUT-HEX,PREVAILING T	14-15640-000	2 ea	\$1.24 U.S. \$1.39 CAN

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

Table 2

Removed Parts

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

Labor Allowance

Table 3 - Labor Allowance

Campaign Number	Procedure	Time Allowed (hours)	SRT Code	Damage Code
FL554A-I	Inspect steering shaft weld	0.2	996-0793A	000-Inspected
	Inspect steering shaft weld and replace steering shaft assembly	0.4	996-0793B	000-Modifiedx

Table 3

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 (e.g. **FL554A, FL554B, etc.**).
- In the Primary Failed Part Number field, enter **25-FL554-000**.
- In the Parts field, enter the appropriate kit numbers or part numbers as shown in the Replacement Parts Tables. **IMPORTANT:** It is estimated that 5 percent or fewer steering shafts will require replacement. When needed, freight charges may be included on recall claims with prior authorization. Submit a CampaignPreApproval inquiry with the freight invoice attached for consideration. TRW is shipping the inspection gauge required for this recall directly to dealerships. If there are any questions about the gauge or a replacement is needed, contact TRW at email address **col194.campaign@TRW.com**. Please include "DTNA Recall FL554" in the subject line. The pinch bolt and nut listed in Table 2 above may be claimed without additional authorization when replacing a steering shaft assembly.
- 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.
- In the Comments field, note the intermediate shaft part number and the date code.
- **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.

Recall Campaign

Daimler Trucks
North America LLC

October 2009
FL554A-I
NHTSA #09V-355

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.

October 2009
FL554A-I
NHTSA #09V-355

Copy of Letter to Owner

Subject: TRW IGEN 3 Steering Shaft Welds

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 its Freightliner Trucks Division, and its wholly owned subsidiary, Freightliner Custom Chassis Corporation, has decided that a defect which relates to motor vehicle safety exists on specific Freightliner Business Class M2 vehicles and Freightliner Custom Chassis B2 school bus chassis (Thomas Built Buses Saf-T-Liner C2) and S2 shuttle bus chassis manufactured April 21, 2009, through July 6, 2009, with certain TRW steering shafts.

A weld on certain TRW IGEN 3 steering shafts that secures the spline tube to the intermediate tube may be mislocated (i.e., not fully over the seam created when the tubes are pressed together). An improperly located weld bead has the potential to reduce the ultimate torsional and axial load capacity of the joint below acceptable levels. A failed steering shaft could cause loss of vehicle control and result in a possible vehicle crash.

The welds will be inspected. If the weld is found to be improperly located, the steering shaft will be replaced.

Parts are now available for authorized dealers to order. Contact your authorized dealer to arrange to have the recall performed and to ensure that parts are available at the dealership. 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 **FL554A-I**. Once kit(s) are received at the dealership, the Recall will take up to approximately an hour, depending on the work needed, and will be performed at no charge to you. Please note, the need to replace a steering shaft cannot be determined until your vehicle is inspected at the dealership, and parts may need to be ordered at that time.

IMPORTANT: When the Recall has been completed, please ensure that a label has been affixed to your vehicle referencing **FL554A-I**.

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

Recall Campaign

Daimler Trucks
North America LLC

October 2009
FL554A-I
NHTSA #09V-355

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.

Work Instructions

Subject: TRW IGEN 3 Steering Shaft Welds

Models Affected: Specific Freightliner Business Class M2 vehicles and Freightliner Custom Chassis B2 school bus chassis (Thomas Built Buses Saf-T-Liner C2) and S2 shuttle bus chassis manufactured April 21, 2009, through July 6, 2009, with certain TRW steering shafts.

IMPORTANT: It is estimated that 5 percent or fewer steering shafts will require replacement. When needed, freight charges may be included on recall claims with prior authorization. Submit a CampaignPreApproval inquiry with the freight invoice attached for consideration.

NOTE: On the RO and in the Comments field of the recall claim, list the intermediate shaft part number and the date code.

Weld Inspection

NOTE: TRW is shipping the inspection gauge required for this recall directly to dealerships. If there are any questions about the gauge or a replacement is needed, contact TRW at email address col194.campaign@TRW.com. Please include "DTNA Recall FL554" in the subject line.

1. Inspect the base label (Form WAR259) for a completion sticker for FL554 (Form WAR260) indicating this work has been done. On M2 and S2 vehicles, the base label is usually located on the passenger-side door about 12 inches (30 cm) below the door latch. On school bus chassis, the base label is usually located above the driver's side window or in the driver's area. If a completion sticker for FL554 is present, no further action is necessary. If a sticker is not present, go to the next step.
2. Park the vehicle on a level surface, shut down the engine, apply the parking brake, and chock the tires.
3. Identify the intermediate steering shaft part number. See **Fig. 1**. Part numbers are followed by a space and a date code. An example of an intermediate shaft part number and date code is 418050-2 A 9126.

Columns requiring inspection are numbered in one of the formats listed in **Table 4**, and have date codes between 9111 and 9146.

Intermediate Shaft Part Number Formats*	Weld Inspection Gauge Part Number
4180##	IF-35029 DET.3 REV.D (Shipped directly to dealers by TRW.)
4180##-#	
4180##-# X	
4180##-##	
4180##-## X	

* # indicates a numeral; X indicates a letter in the part number

Table 4, Part Number Formats

4. If the intermediate shaft is not an IGEN 3 model (shown in **Fig. 1**), no further action is necessary.
If the part number on the IGEN 3 intermediate shaft does not match one of the formats listed in the left column of **Table 4**, no further action is necessary.
If the date code on the IGEN 3 intermediate shaft does not fall between 9111 and 9146, no further action is necessary.

Recall Campaign

Daimler Trucks
North America LLC

October 2009
FL554A-I
NHTSA #09V-355

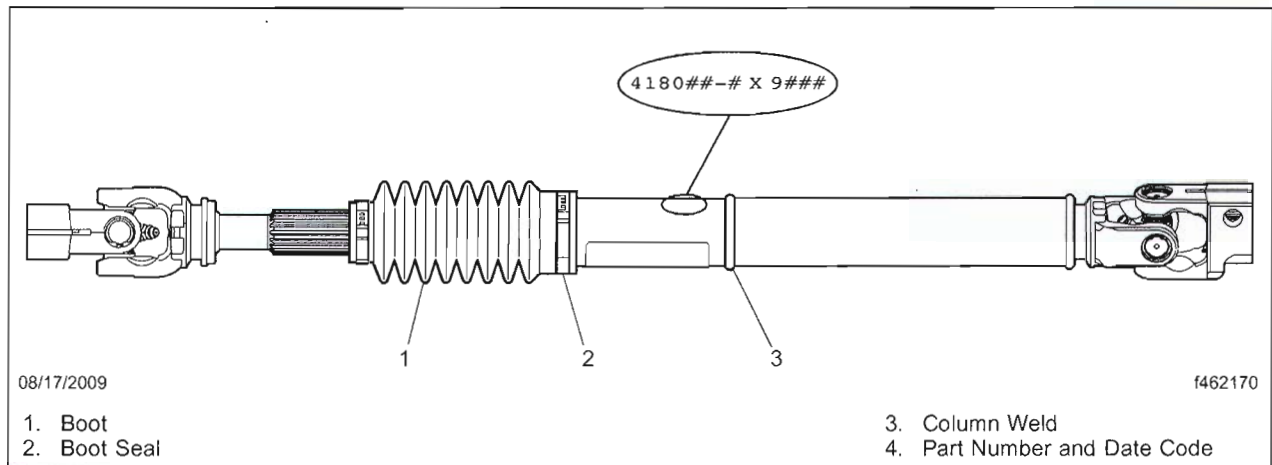


Fig. 1, TRW IGEN 3 Intermediate Shaft

If the date code on the IGEN 3 intermediate shaft is followed by a second code starting with 'P' (e.g., P###), no further action is necessary.

If any of the "no further action necessary" statements above apply, write the campaign number, FL554, on a blank red completion sticker and attach it to the base label. If not, continue with this step.

If the IGEN 3 intermediate shaft has a date code between 9111 and 9146 and a part number format matching one of those listed in the left column of **Table 4**, proceed to the next step.

5. Clean the welded area and boot seal of any dirt, oil, or debris.
6. Inspect the intermediate shaft using the TRW weld position gauge specified in **Table 4**. (The weld inspection gauge was shipped directly to dealers by TRW.) Place the end of the gauge against the base of the boot so that the gauge body covers the column part number. See **Fig. 2**

NOTE: The wide window in the gauge is for visual reference only; do not use it for gauging purposes.

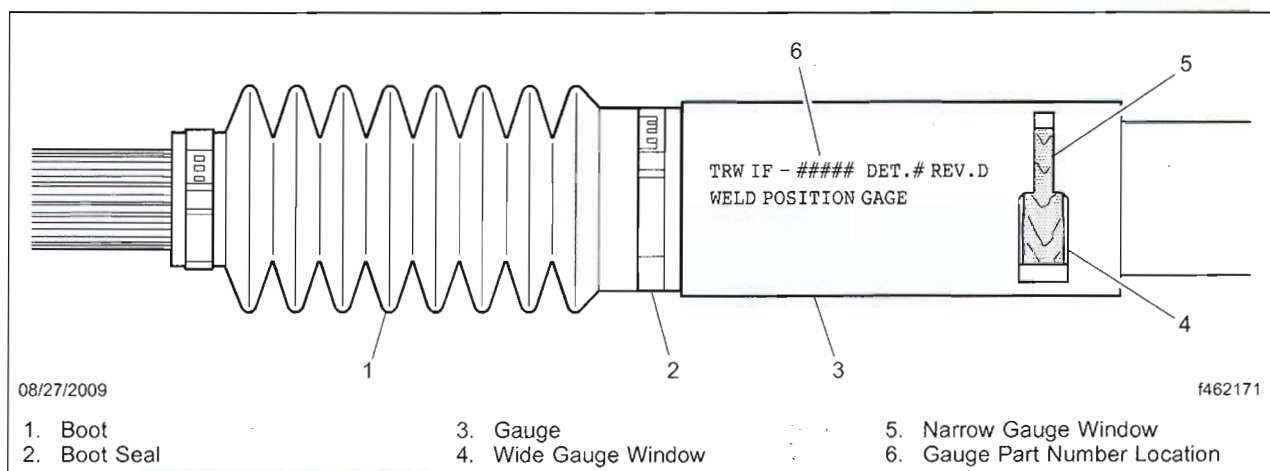


Fig. 2, TRW Weld Position Gauge Placement

7. Visually inspect the full circumference of the weld seam in the narrow gauge window. See **Fig. 3**. Check for the following:

- the weld bead completely fills the narrow gauge window;
- the joint line is not visible between the two column tubes (the joining edge is covered by the weld);
- the tube is not visible.

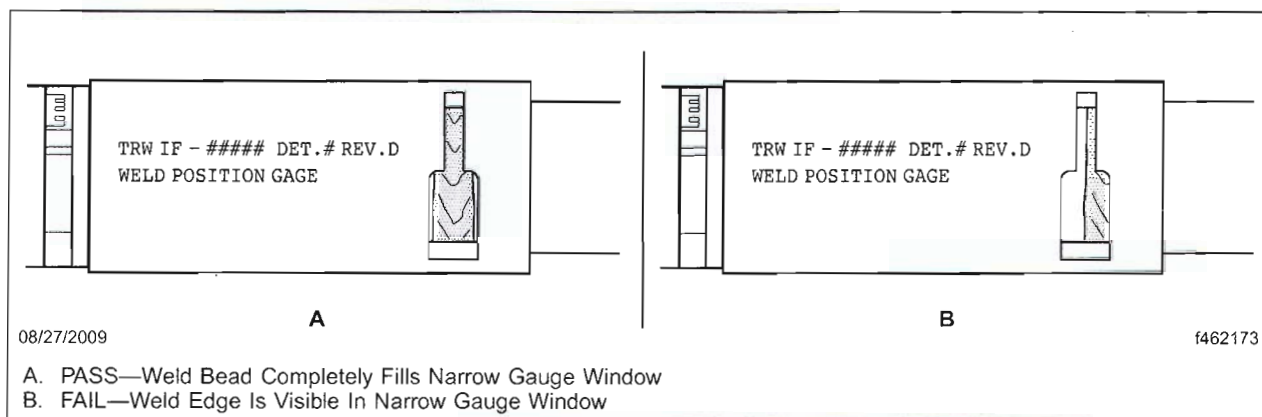


Fig. 3, Gauge Measurement

8. If the column meets all three criteria listed in the previous step, mark the column with white or yellow paint next to the part number to show that it has passed inspection. On the RO, include the intermediate shaft part number and the date code. These will be recorded on the recall claim.
- If the column does not meet all three criteria listed in the previous step, replace the intermediate shaft. On the RO, include the intermediate shaft part number and the date code. These will be recorded on the recall claim.
9. Clean a spot on the base label (Form WAR259), write the recall number, FL554, on a blank red completion sticker (Form WAR260), and attach it to the base label to indicate the work has been completed.