



RECEIVED
By Recall Mgt Div. at 3:04 pm, Jan 25, 2010

10V-020
(13 pages)

January 12, 2010

Ms. Kathy DeMeter, Director
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Admin.
400 - 7th Street S.W.
Washington, DC 20590

Dear Ms. DeMeter:

Winnebago Industries[®] submits the following report pursuant to Part 573 of the NHTSA regulations. The numbered paragraphs below correspond to those found at Part 573.5(c).

1. Winnebago Industries, Inc.
P.O. Box 152
Forest City, IA 50436
2. The motor vehicles potentially containing the defective component are: Certain 2008 through 2009 Winnebago[®] Vectra and Itasca[®] Horizon motor homes. These motor homes were built November 2006 through May 2009. The vehicles are being identified using the model number and production records showing VINs.
3. The total number of vehicles potentially containing the defective component is: 247.
4. The percentage of vehicles estimated to contain the defect is 100%.
5. The defect involves the adjustable brake pedal that may loosen. The drive pin which secures the brake pedal arm to the balance of the assembly may become disengaged, this may cause a reduction in vehicle braking and/or cause the brake pedal to move out of position and interfere with a throttle pedal function. A reduction in braking or interference with the throttle pedal could result in a vehicle crash.
6. Winnebago Industries discovered the defect as a result of a January 11, 2010 e-mail from Freightliner LLC to Ron Post of Winnebago Industries. Referencing their recall # FL-569.
7. N/A.
8. Winnebago Industries will continue to assist Freightliner LLC to correct the situation as we provide them a current list of owners on a weekly basis. Freightliner LLC will be conducting the recall.
9. N/A.
10. N/A.
11. N/A.

1001p573

Ms. Kathy DeMeter, Director
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A handwritten signature in black ink, appearing to read "Dale Jordal". The signature is fluid and cursive, with a large initial "D" and a stylized "J".

Dale Jordal
Product Safety Administrator

1001p573

Enclosure

January 2010
FL569AB
NHTSA #09V-461
REVISED NOTICE

Subject: KPPS Adjustable Brake Pedals

Models Affected: Specific Freightliner Custom Chassis B2 school bus chassis (Thomas Built Buses Saf-T-Liner C2 school buses) manufactured October 6, 2004, through November 12, 2009, and XC motorhome chassis manufactured March 6, 2007, through December 11, 2009, with certain Kongsberg Power Products Systems (KPPS) adjustable brake pedals. (Please note, there are also three XB shuttle bus chassis included in this recall.)

General Information

Daimler Trucks North America LLC, on behalf of 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 9,000 vehicles involved in this campaign.

The adjustable brake pedal may loosen. The drive pin which secures the brake pedal arm to the balance of the assembly may become disengaged, this may cause a reduction in vehicle braking and/or cause the brake pedal to move out of position and interfere with throttle pedal function. A reduction in braking or interference with the throttle pedal could result in a vehicle crash.

A clamp assembly will be installed on the adjustable brake pedal arm, preventing it from loosening. It is expected that all vehicles need the clamp assembly installed. An inspection is included to catch any vehicles that were repaired at the factory before delivery.

REVISIONS: Motorhome chassis have been added as FL569B and a new kit for this group has been added. The Work Instructions have been updated to show that the C-clamp assembly comes with the top bolt pre-torqued. The procedure is the same for all vehicles.

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.

If our records show your dealership has ordered any vehicles involved in campaign number FL569A, 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.

NOTE: Completion stickers are not included in the kits. Please use blank completion stickers and write in the recall number, FL569.

Recall Campaign

Daimler Trucks
North America LLC

January 2010
FL569AB
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Table 1 - Replacement Parts for FL569A

Campaign Number	Kit Number	Part Description	Part Number	Qty.	Suggested Wholesale*
FL569A	25-FL569-000	C-Clamp Assembly Kit - School Buses	KPPS Kit #318282	1 kit	\$.96 U.S. \$1.01 CAN
FL569B	25-FL569-001	C-Clamp Assembly Kit - Motorhomes	KPPS Kit #318297	1 kit	\$.96 U.S. \$1.01 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

Removed Parts

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

Labor Allowance

NOTE: It is expected that all vehicles need the clamp assembly installed. An inspection is included to catch any vehicles that were repaired at the factory before delivery.

Table 2 - Labor Allowance

Campaign Number	Procedure	Time Allowed (hours)	SRT Code	Damage Code
FL569AB	Inspect and install a C-clamp on the adjustable brake pedal	0.2	996-0798A	000-Modifiedx
	Inspect for and find C-clamp or roll pin on the adjustable brake pedal,	0.2	996-0798B	000-Inspected

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 (**FL569A**).
- In the Primary Failed Part Number field, enter **25-FL569-000**.
- In the Parts field, enter the appropriate kit number(s) as shown in the Replacement Parts Table.
- In the Labor field, first enter the appropriate SRT from the Labor Allowance Table. For administrative time, enter SRT 939-0010A for 0.4 hours for RVs or 0.3 hours for all other vehicles.
- **Reimbursement for Prior Repairs.** When a customer asks about reimbursement, please do the following.
 - Accept the documentation of the previous repair.

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- 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

January 2010
FL569AB
NHTSA #09V-461
REVISED NOTICE

Copy of Letter to Owner Subject: KPPS Adjustable Brake Pedals

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 wholly owned subsidiary, Freightliner Custom Chassis Corporation, has decided that a defect which relates to motor vehicle safety exists on specific Freightliner Custom Chassis B2 school bus chassis (Thomas Built Buses Saf-T-Liner C2 school buses) manufactured October 6, 2004, through November 12, 2009, and XC motorhome chassis manufactured March 6, 2007, through December 11, 2009, with certain Kongsberg Power Products Systems (KPPS) adjustable brake pedals. (Please note, there are also three XB shuttle bus chassis involved in this recall.)

The adjustable brake pedal may loosen. The drive pin which secures the brake pedal arm to the balance of the assembly may become disengaged, this may cause a reduction in vehicle braking and/or cause the brake pedal to move out of position and interfere with throttle pedal function. A reduction in braking or interference with the throttle pedal could result in a vehicle crash.

A clamp assembly will be installed on the adjustable brake pedal arm, preventing it from loosening.

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 **FL569A**. Once kit(s) are received at the dealership, the Recall will take approximately half an hour 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 **FL569A**.

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.

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Work Instructions

Subject: KPPS Adjustable Brake Pedals

Models Affected: Specific Freightliner Custom Chassis B2 school bus chassis (Thomas Built Buses Saf-T-Liner C2 school buses) manufactured October 6, 2004, through November 12, 2009, and XC motorhome chassis manufactured March 6, 2007, through December 11, 2009, with certain Kongsberg Power Products Systems (KPPS) adjustable brake pedals. (Please note, there are also three XB shuttle bus chassis included in this recall.)

REVISIONS: Motorhome chassis have been added as FL569B and a new kit for this group has been added. The Work Instructions have been updated to show that the C-clamp assembly comes with the top bolt pre-torqued. The procedure is the same for all vehicles.

NOTE: It is expected that all vehicles need the clamp assembly installed. An inspection is included to catch any vehicles that were repaired at the factory before delivery.

Inspection

1. Check the base label (Form WAR259) for a completion sticker for campaign FL569 (Form WAR260) indicating this work has been done. The base label is usually located above the driver's window on school buses or on the front wall under the dash on motorhomes. If a completion sticker for this campaign is present, no further work is needed. If a completion sticker is not present, proceed with the next step.
2. Park the vehicle on a level surface, shut down the engine, apply the parking brake, and chock the tires.
3. Check to see if a C-clamp or roll pin is installed on the adjustable brake pedal. See **Fig. 1**.
4. If either a C-clamp or a roll pin is found, no further work is needed. Clean a spot on the base label (Form WAR259), write the recall number, FL569, on a blank completion sticker (Form WAR260), and attach it to the base label. Remove the chocks from the tires.

If a C-clamp or a roll pin is not found, go to "C-clamp Installation" below.

C-clamp Installation

NOTE: The bolt threads come equipped with an application of Loctite®. The top bolt of the C-clamp assembly comes pre-torqued.

1. With the C-clamp in your hand, install the C-clamp assembly in the guide hole at the top of the brake arm casting. Make certain the C-clamp is against the casting. The bolt with the lockwasher should be installed at the top, as shown in **Fig. 1**, Items 4 and 5. Then tighten the bottom bolt 40±5 lbf.in (452±5 N.cm).
2. Clean a spot on the base label (Form WAR259), write the recall number, FL569, on a blank completion sticker (Form WAR260), and attach it to the base label.
3. Remove the chocks from the tires.

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

December 18, 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-461, FL-569, KPPS Adjustable Brake Pedals

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 revising the type and quantity of vehicles affected.

Original:

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

Brands: Thomas Built Bus

Revised to read:

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

Brands: Thomas Built Buses, Freightliner Custom Chassis

A Daimler Company

Daimler Trucks North America LLC
4747 N. Channel Avenue
Portland OR 97217-7699
503-745-6910 Phone
503-745-5544 Fax
Nasser.Zamani@Daimler.com

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Original:

(c)(2) Vehicles identification:

Model(s) affected: Saf-T-Liner C2

Model Years affected: 2006 through 2011

Manufacture Dates: 10/05/2004 through 11/25/2009

Basis for determining population: Saf-T-Liner C2 school buses built on FCCC B2 chassis and equipped with specific adjustable pedals supplied by KPPS

Component manufacturer if other than the vehicle manufacturer:

Kongsberg Power Products Systems

101 Western Maryland Parkway

Hagerstown, MD 21740

Contact person : Dan Carr, 484-431-1247

Revised to read:

(c)(2) Vehicles identification:

Model(s) affected: Thomas Built Buses - Saf-T-Liner C2

Freightliner Custom Chassis – RV and Shuttle Bus Chassis

Model Years affected: 2006 through 2011

Manufacture Dates: 10/05/2004 through 11/25/2009

Basis for determining population: RV chassis and shuttle bus chassis equipped with specific adjustable pedals supplied by KPPS, and Saf-T-Liner C2 school buses built on FCCC B2 chassis and equipped with specific adjustable pedals supplied by KPPS

Component manufacturer if other than the vehicle manufacturer:

Kongsberg Power Products Systems

101 Western Maryland Parkway

Hagerstown, MD 21740

Contact person : Dan Carr, 484-431-1247

(c)(2)(v) Manufacturer that purchased affected RV and Shuttle Bus Chassis:

Business Name	Address	Phone Number
Alfa Leisure	1612 S. Cucamonga Ave. Ontario, CA 91761	(909) 628-5574
Caio Induscar	580 Huiet D McDonough, GA 45334	(770) 898-2757
Coachmen RV of Indiana	423 N. Main Street Middlebury, IN 46540	(574) 825-5821
Entegra Coach	66149 States RD 19 Wakarusa, IN 46573	(574) 862-4484
Farber Specialty Vehicles	7052 Americana Parkway Reynoldsburg, OH 43068	(614) 863-6470
Forest River Diesel Division	55470 Country Road 1 Elkhart, IN 46514	(574) 522-1785
Four Winds	701 Country Road 15 Elkhart, IN 46515	(574) 266-1111
Gulfstream	503 S. Oakland Nappanee, IN 46550	(574) 773-7761
Mobil Conversions	3354 State Route 132 Amelia, OH 45102	(513) 797-1991

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National RV	3411 N. Perris Blvd. Perris, CA 92570	(951) 943-6007
Tiffin	105 2nd Street NW Red Bay, AL 35582	(256) 356-8661
Triple E	301 Roblin Blvd. Winkler, MB Canada R6W4C4	(204) 325-4361
Winnebago	605 W. Crystal Lake Road Forest City, IA 50436	(641) 585-6252

Original:

(c)(3) Total number of vehicles potentially affected: Approximately 6,206

First Revision:

(c)(3) Total number of vehicles potentially affected: 6,052

Revised to read:

(c)(3) Total number of vehicles potentially affected: Approximately 8,801

Group	Approx. Quantity
Saf-T-Liner C2	6,052
Alfa Leisure	55
Caio Induscar	1
Coachmen RV of Indiana	50
Entegra Coach	42
Farber Specialty Vehicles	1
Forest River Diesel Division	54
Four Winds	248
Gulfstream	2
Mobil Conversions	1
National RV	108
Tiffin	1,939
Triple E	1
Winnebago	247

Original:

(c)(8) (i) **Remedial program:** Retaining device will be mounted on pedals thus preventing the loosening of the pedal. 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

(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 01/01/2009
Dealer notification will be completed approximately 12/15/2009

DAIMLER

First Revision:

(c)(8)(ii) Communications sent to dealers: posted December 11, 2009
Communications sent to owners: will be posted by December 22, 2009

Revised to read:

(c)(8) (i) **Remedial program:** Retaining device will be mounted on pedals thus preventing the loosening of the pedal. 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

(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.

Saf-T-Liner C2 - Dealer Notification was completed December 11, 2009

RV and Shuttle Bus Chassis - Dealer Notification will be completed by January 15, 2010

Saf-T-Liner C2 - Owner Notification will be completed December 22, 2009

RV and Shuttle Bus Chassis - Owner Notification will be completed by January 15, 2010

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Michael Mason, CAL-OSHA
Certified Mail# 7006 3450 0000 3866 7775

A Daimler Company

Daimler Trucks North America LLC
4747 N. Channel Avenue
Portland OR 97217-7699
503-745-6910 Phone
503-745-5544 Fax
Nasser.Zamani@Daimler.com

**Daimler Trucks
North America LLC**

Daimler Trucks North America LLC
P.O. Box 4090
Portland, OR 97208-4090
800.547.0712 Phone
503.745.9009 Fax

**January 2010
FL569
NHTSA #09V-461
TC #09-338**

**Recall Notification
Subject: KPPS Adjustable Brake Pedals**

Daimler Trucks North America has begun notifying its dealers and customers of a safety related defect that exists in certain chassis manufactured by Freightliner Custom Chassis Corporation and delivered to your company. A remedy without charge is now available, and owners may take their vehicle to a Daimler Trucks North America-authorized service facility to have the recall performed. The Recall Bulletin, which includes a representative copy of the owner notification and dealer work instructions, and a list of potentially affected vehicles delivered to you are attached for your information.

Your company may have an obligation to notify its dealers, distributors, and customers of this recall under Title 49 Code of Federal Regulations Part 577.13 and/or Motor Vehicle Safety Act Section 10(1).

If you have questions or need further information, please contact the Warranty Campaigns Department at (800) 547-0712, 7:00 a.m. to 4:00 p.m. Pacific Time.

WARRANTY CAMPAIGNS DEPARTMENT
Enclosure