

# DAIMLER

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

August 4, 2010

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  
10V-102, FL-573,  
IMMI LifeGuard RollTek Advanced Occupant Protection Systems**

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: 490
- (c) (8)(ii) Dealer and distributor notification: posted July 30, 2010  
Owner notification: will be completed by August 13, 2010
- (c) (10) Copies of Communications to be sent to owners and copies posted to dealers are attached.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Michael Mason, CAL-OSHA  
Enclosure  
Certified Mail#

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

## Subject: IMMI LifeGuard RollTek Advanced Occupant Protection Systems

**Models Affected: Specific Freightliner Cascadia vehicles manufactured July 17, 2007, through February 22, 2010, with IMMI LifeGuard RollTek Advanced Occupant Protection Systems.**

### General Information

Daimler Trucks North America LLC, on behalf of its Freightliner Trucks Division, has decided that a defect which relates to motor vehicle safety exists on the vehicles mentioned above.

There are approximately 500 vehicles involved in this campaign.

The LifeGuard RollTek Advanced Occupant Protection System, designed to provide additional protection to vehicle occupants in the event of a rollover accident, may not have been properly installed, potentially reducing the system's effectiveness. This may increase the risk of injury that the system is designed to reduce.

The system will be inspected for correct installation and additional retainers will be installed to ensure the system remains fully functional.

### 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 FL573A, 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:** One or two tie straps may be included as additional parts when necessary to secure the seat air lines.

# Recall Campaign

Daimler Trucks  
North America LLC

July 2010  
FL573AB  
NHTSA #10V-102

Table 1 - Replacement Parts for FL573AB

Campaign Number	Kit Number	Part Description	Qty. per Kit	Suggested Wholesale*
FL573A (Use 1 kit)	25-FL573-000	Retainer Straps	2 ea	\$16.04 U.S. \$16.36 CAN
FL573B (Use 2 kits)		Hanging Warning Tag	1 ea	
		Adhesive Warning Label	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
FL573A	Install straps on one side and affix label	0.4	996-0814A	000-Modifiedx
FL573B	Install straps on both sides and affix label	0.7	996-0814B	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 (**FL573A** or **FL573B**).
- In the Primary Failed Part Number field, enter **25-FL573-000**.
- In the Parts field, enter the appropriate kit number(s) as shown in the Replacement Parts Table. Use and claim one kits for FL573A; use and claim two kits for FL573B NOTE: One or two tie straps may be included as additional parts when necessary to secure the seat air lines.
- 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.
- For OWL, the VMRS Component Code is 002-011-051.

- **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.)
  - Submit a Campaign Pre-Approval inquiry to 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 from 7:00 a.m. to 4:00 p.m. Pacific Time, Monday through Friday, via Web inquiry at [AccessFreightliner.com / Support / Submit an Inquiry](http://AccessFreightliner.com/Support/SubmitanInquiry), 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 2010  
FL573AB  
NHTSA #10V-102

## Copy of Letter to Owner

### Subject: IMMI LifeGuard RollTek Advanced Occupant Protection Systems

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, has decided that a defect which relates to motor vehicle safety exists on specific Freightliner Cascadia vehicles manufactured July 17, 2007, through February 22, 2010, with IMMI LifeGuard RollTek Advanced Occupant Protection Systems.

The LifeGuard RollTek Advanced Occupant Protection System, designed to provide additional protection to vehicle occupants in the event of a rollover accident, may not have been properly installed, potentially reducing the system's effectiveness. This may increase the risk of injury that the system is designed to reduce.

The system will be inspected for correct installation and additional retainers will be installed to ensure the system remains fully functional.

Parts are now available for authorized dealers to order. Contact your authorized Daimler Trucks North America 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](http://www.FreightlinerTrucks.com) or contact the Warranty Campaigns Department for assistance.

When you contact your dealer, refer to campaign number **FL573A**. Once kit(s) are received at the dealership, the Recall will take up to approximately 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 **FL573A**.

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](mailto: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.

July 2010  
FL573AB  
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## Work Instructions

### Subject: IMMI LifeGuard RollTek Advanced Occupant Protection Systems

**Models Affected:** Specific Freightliner Cascadia vehicles manufactured July 17, 2007, through February 22, 2010, with IMMI LifeGuard RollTek Advanced Occupant Protection Systems.

#### Inspection and Repair Procedure

1. Check the base label (Form WAR259) for a completion sticker for campaign FL573 (Form WAR260) indicating this work has been done. The base label is usually located on the passenger-side door about 12 inches (30 cm) below the door latch. If a completion sticker for this campaign is attached, no further work is needed. If a completion sticker for this campaign is not attached, continue with the next step.
2. Apply the parking brakes and chock the tires.
3. Raise the seat to its maximum position. If the seat is equipped with a seat shroud, remove or lift the shroud to access the RollTek module.
4. Remove the access panel from the back of the RollTek module. See **Fig. 1**.
5. Check the wiring on the back of the RollTek module, including the connectors located behind the upholstery on the back of the seat. See **Fig. 2**. Make sure that all wires are connected securely.
6. Install the access panel over the recess on the back of the RollTek module.
7. Affix the warning label on the back of the RollTek module so that it overlaps the edge of the access panel. See **Fig. 3**.
8. Cut the tie strap that secures the pulldown-strap hook to the seat belt pretensioner cable. See **Fig. 4**.
9. Check the seat air lines. Secure them with a tie strap to prevent entanglement in the seat suspension, if necessary. See **Fig. 5**.
10. Secure tie straps around both hooks and the pretensioner cable. See **Fig. 6**.
11. Attach the warning tag that shows proper installation of the wire hooks, as shown in **Fig. 7**.
12. If the seat is equipped with a seat shroud, install or lower the shroud.
13. Repeat this procedure on the RollTek module installed on the passenger side of the vehicle, if applicable.
14. Clean a spot on the base label (Form WAR259). The base label is usually located on the passenger-side door about 12 inches (30 cm) below the door latch. Attach a completion sticker for FL573 (Form WAR260) to the base label.

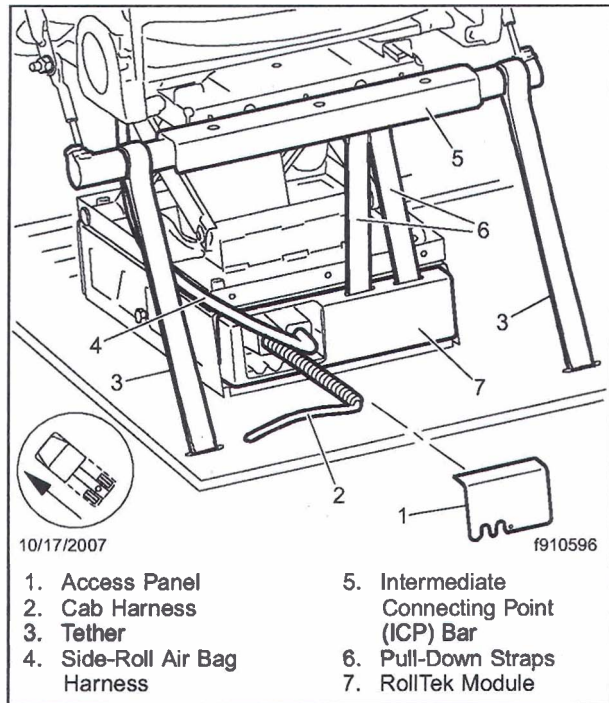


Fig. 1, RollTek Module Wiring Access

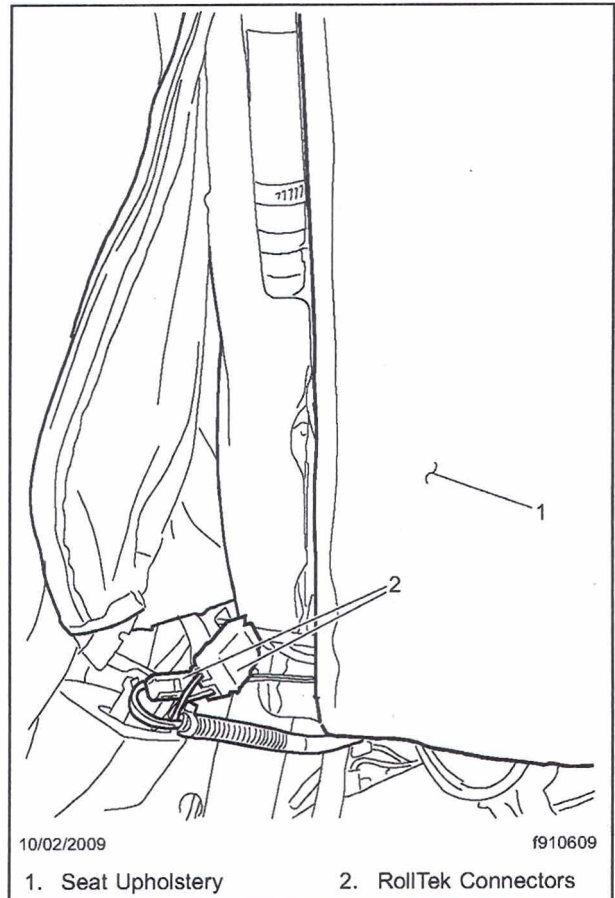


Fig. 2, RollTek Connectors Located Behind Seat Upholstery

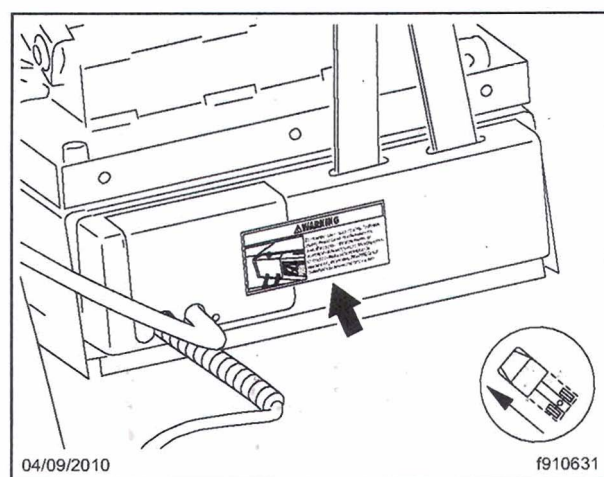
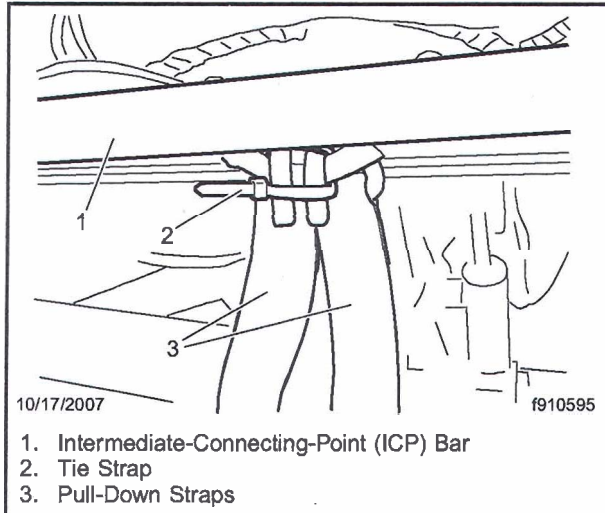


Fig. 3, Label Affixed Next to the Access Panel

# Recall Campaign

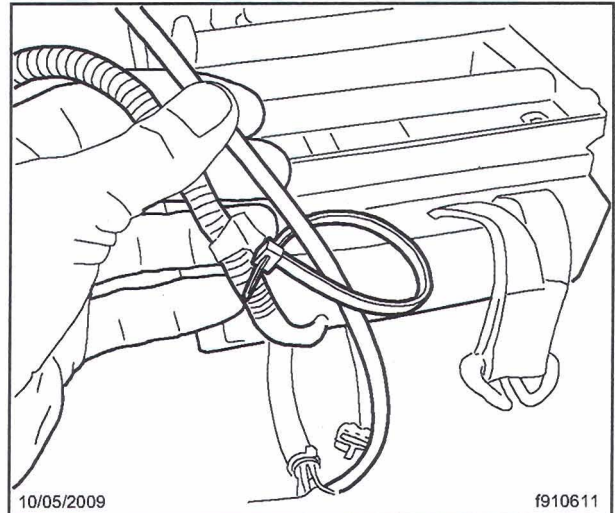
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North America LLC

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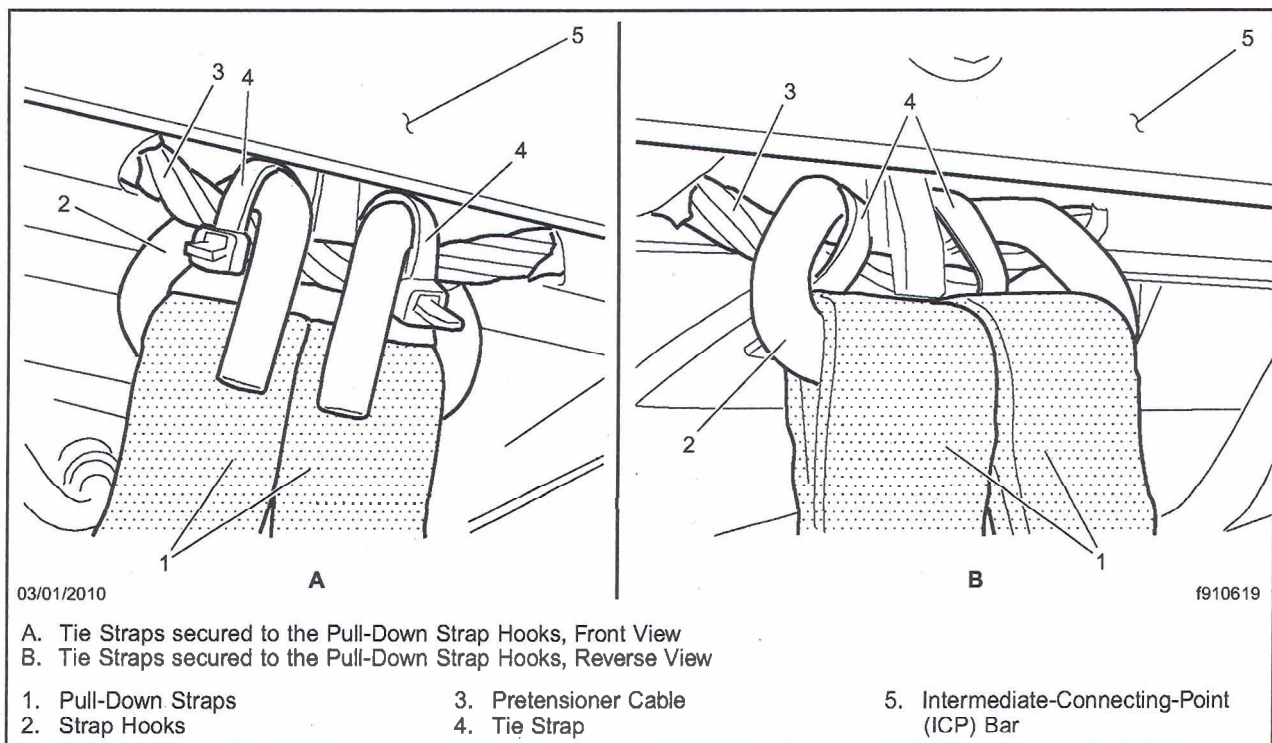


1. Intermediate-Connecting-Point (ICP) Bar
2. Tie Strap
3. Pull-Down Straps

**Fig. 4, Pulldown-Strap Hook**



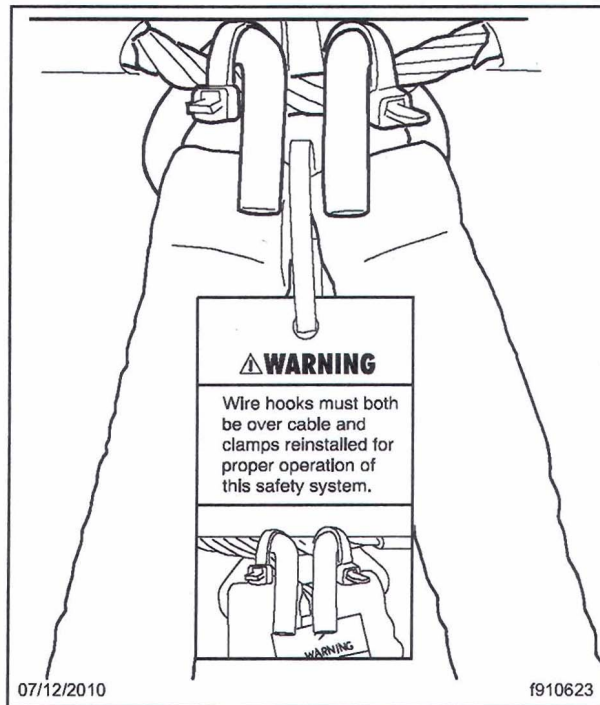
**Fig. 5, Securing the Air Lines with a Tie Strap**



- A. Tie Straps secured to the Pull-Down Strap Hooks, Front View
- B. Tie Straps secured to the Pull-Down Strap Hooks, Reverse View

- |                     |                       |  |
|---------------------|-----------------------|--|
| 1. Pull-Down Straps | 3. Pretensioner Cable | 5. Intermediate-Connecting-Point (ICP) Bar |
| 2. Strap Hooks      | 4. Tie Strap          |  |

**Fig. 6, Securing the Pull-Down Strap Hooks with a Tie Strap**



**Fig. 7, Warning Label Attached to the Pull-Down  
Strap Hooks**