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10V-322  
(3 pages)

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

July 12, 2010

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-582, 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 reports a safety campaign to recall approximately 2342 Thomas Built Buses Saf-T-Liner C2 school buses manufactured October 23, 2008 through April 20, 2009 and 6325 Freightliner Business Class M2 and Sterling Acterra, A-Line and L-Line vehicles manufactured September 9, 2008 through April 20, 2009, and equipped with a TRW I-GEN 3 steering shaft with a defect in the steering shaft which may reduce the ultimate torsional and axial load capacity of the shaft.

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 0000 3866 7935

A Daimler Company

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## Defect Information Report (Section 573.6)

Date: July 12, 2010.

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

**Brands:** Freightliner, Sterling

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

**Model(s) affected:** Freightliner Business Class M2, Sterling Acterra, A-Line, L-Line

**Model Years affected:** 2009, 2010

**Manufacture Dates:** September 9, 2008 through April 20, 2009

**Basis for determining population:** All vehicles built April 20, 2009 or earlier containing a TRW I-GEN 3 steering shaft

**Component manufacturer if other than the vehicle manufacturer:**

TRW Automotive U.S. LLC  
702 Lyons Rd  
Portland, MI 48875

(c)(3) **Total number of vehicles potentially affected:** Approximately 6325

(c)(4) **Percentage of vehicles estimated to contain the defect:** 1%

(c)(5) **Description of the defect:** TRW reported that a weld on certain TRW I-GEN 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). The improperly located weld bead has the potential to reduce the ultimate torsional and axial load capacity of the joint below acceptable levels. The TRW NHTSA recall number is 10E-026, which is an expansion of an earlier TRW recall (NHTSA recall number 09E-041).

**49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety:** A failed steering shaft could cause a loss of vehicle control and a crash may occur.

(c)(6) **Chronology of principal events:**

05/03/2009 – A TRW I-GEN 3 steering shaft failed on a Thomas Built Bus. The steering shaft was returned to TRW for inspection.

06/22/2010 – TRW initiated Recall 10E-026 for the I-GEN3 Steering Shaft.

(c)(7) **Noncompliance-test or other data:** NA

(c)(8) (i) **Remedial program:** The weld location on the steering shaft will be inspected with a check gauge. The steering shaft will be replaced if the weld is found to be mislocated. 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 October 4, 2010

Dealer and distributor notification will be completed approximately October 4, 2010

(c)(9) **Information for tire recalls:** Not Applicable

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**(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-582