

RECEIVED

By Recall Management Division at 9:15 am, Aug 03, 2010

10V-360
(2 Pages)

DAIMLER

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

August 2, 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-583, M2 Headlamp Height

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 16 Freightliner Business Class M2 106V vehicles manufactured April 12, 2010 through July 16, 2010, and equipped with an EPA 2010 hood with headlamps that may be greater than 54" from the road surface.

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 7959

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

Defect Information Report

(Section 573.6)

Date: August 2, 2010

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

Brands: Freightliner

(c)(2) Vehicles identification:

Model(s) affected: Business Class M2 106V

Model Years affected: 2011

Manufacture Dates: April 12, 2010 through July 16, 2010

Basis for determining population: EPA 10 M2 106V vehicles with certain suspension and tire combinations built before July 16, 2010.

Component manufacturer if other than the vehicle manufacturer: N/A

(c)(3) Total number of vehicles potentially affected: Approximately 16

(c)(4) Percentage of vehicles estimated to contain the defect: Unknown

(c)(5) Description of the defect: Business Class M2 106V trucks may have headlights which measure greater than 54" from the road surface. Federal Motor Vehicle Safety Standard 49CFR571.108(§5.3) requires headlights to be not less than 22 inches, nor more than 54 inches above road surface.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: Improper height of headlights may not fully illuminate road surface or may inhibit the ability of motorists to see vehicles. This can increase the risk of traffic accidents.

(c)(6) Chronology of principal events:

06/30/2010 – DTNA truck manufacturing plant discovered that the headlights were above 54" on one fleet of incomplete vehicles.

(c)(7) Noncompliance-test or other data: No test was necessary in determining the noncompliance of headlight height. On July 14th DTNA engineering reviewed headlight calculations with current dimensions and determined some vehicles may not comply with FMVSS 108.

(c)(8) (i) Remedial program: Vehicle headlamp height will be measured. Any vehicles with headlamps above 54" will receive new headlamps that lower the bulb center to be at or below 54". Repairs will be performed by Daimler Trucks North America dealerships and 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 25, 2010.
Dealer and distributor notification will be completed approximately October 25, 2010.

(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-583