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(3 Pages)

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

January 7, 2011

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-587, M2 Seat Belt Anchor

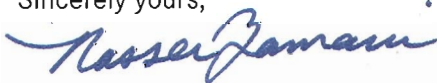
Mr. Smith

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 366 Freightliner Business Class M2 vehicles manufactured August 25, 2009, through September 3, 2009, and equipped with out-of specification inboard seat belt anchors.

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 0003 7727 0698

A Daimler Company

Daimler Trucks North America LLC
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Defect Information Report (Section 573.6)

January 7, 2011

(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

Model Years affected: 2010

Manufacture Dates: August 25, 2009, through September 3, 2009

Basis for determining population: Business Class M2 vehicles built at DTNA's Santiago truck manufacturing plant August 25, 2009, through September 3, 2009.

Component manufacturer if other than the vehicle manufacturer: Not Applicable

(c)(3) **Total number of vehicles potentially affected:** Approximately 366

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

(c)(5) **Description of the defect:** Out-of-specification inboard (buckle end) seat belt anchor backing plates were used on certain Business Class M2 vehicles built at DTNA's Santiago truck manufacturing plant. Although vehicles built with the subject out-of-specification anchor plates comply with FMVSS 210 (Seat Belt Assembly Anchorages), they do not meet DTNA design specifications.



View of suspect RH inboard seat belt anchor location



View of suspect inboard seat belt anchor locations with floor covering pulled back

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: In the event of an accident, the seat belt anchorage may not perform as expected increasing the risk of injury.

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(c)(6) Chronology of principal events:

August 25, 2009 through September 3, 2009 Santiago truck manufacturing plant assembled a series of vehicles with out-of-specification inboard seat belt anchor plates. After determining that the seat belt anchors were out-of-specification, all suspect vehicles were placed on hold pending an engineering evaluation of the seat belt anchorage system as-built.

A series of engineering tests and analysis's were performed and it was determined that although the as-built seat belt anchorage system complied with FMVSS 210, it did not meet DTNA design standard. Following these test, a corrective action program was launched at the Santiago truck manufacturing plant to modify all affected vehicles to bring them up to DTNA design standards prior to release.

In late November 2010 internal DTNA reports indicated the potential that not all affected vehicles had been properly modified prior to release. A subsequent audit identified a portion of the affected population that may not have received the modification.

January 4, 2011 – DTNA decided that although no clear threat to motor vehicle safety exists, out of an abundance of caution, DTNA would conduct a voluntary safety recall to inspect all potentially affected vehicles and ensure they are brought up to DTNA design standards.

(c)(7) Noncompliance-test or other data: Not Applicable

(c)(8) (i) Remedial program: Potentially affected vehicles will be inspected to determine if the modification has already been applied. On vehicles not yet modified, the existing seat belt anchor bolt will be replaced with a longer bolt, and two hardened washers and a jamb nut will be added. Repairs will be performed by Daimler Trucks North America authorized service facilities.
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 March 11, 2011.
Dealer and distributor notification will be completed approximately March 4, 2011.

(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-587