

# DAIMLER

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

March 16, 2011

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. 1  
11V-008, FL-587, M2 Seat Belt Anchor Backing Plate**

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.

- (c)(3) Total number of vehicles potentially affected: 369
- (c) (8)(ii) Dealer and distributor notification: Began and ended: March 15, 2011
- (c) (10) A copy of communications sent to dealers is attached.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Michael Mason, CAL-OSHA  
Attachment

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: Freightliner Business Class M2 Seat Belt Anchor Backing Plates

**Models Affected: Specific Freightliner Business Class M2 model vehicles manufactured August 25, 2009, through September 3, 2009, at the Santiago truck manufacturing plant.**

### General Information

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

There are approximately 500 vehicles involved in this campaign.

Certain Business Class M2 vehicles may have been manufactured with out-of-specification inboard (buckle end) seat belt anchor backing plates. Although these vehicles comply with FMVSS 210 (Seat Belt Assembly Anchorages), they do not meet DTNA design specifications. In the event of a crash, the seat belt anchorage may not perform as expected, increasing the risk of injury. Some vehicles have already had the seat belt anchorages brought up to DTNA design standards.

Potentially affected vehicles will be inspected and those that have not already been modified, will have the existing seat belt anchor bolt replaced and two hardened washers and a jam nut added. Approximately 45 percent of vehicles are expected to need the new hardware installed.

### 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 nearest Parts Distribution Center. **IMPORTANT: Approximately 45 percent of vehicles are expected to need the new hardware installed. Do not order a kit for every vehicle.**

If our records show your dealership has ordered any vehicles involved in campaign number FL587A, 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.

**Table 1** - Replacement Parts for FL587

Campaign Number	Kit Number	Part Description	Part Number	Qty. per Kit	Suggested Wholesale*
FL587A	25-FL587-000	SCREW 7/16-20F X 2" G8	23-09439-200	2 ea	\$2.44 U.S. \$2.49 CAN
		7/16" BEARING	23-09114-001	2 ea	
		WASHER	23-09114-017	2 ea	
		NUT HEX FLG	23-13223-007	2 ea	
		REINF AY-SEAT BELT S	A18-46584-000	2 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.

# Recall Campaign

Daimler Trucks  
North America LLC

March 2011  
FL587A  
NHTSA #11V-008  
Transport Canada #11-010

## 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
FL587A	Inspect seat tether mounting bolts	0.2	996-0830A	000-Inspected
	Inspect and replace seat tether mounting bolts	0.4	996-0830B	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 (**FL587A**).
- In the Primary Failed Part Number field, enter **25-FL587-000**.
- 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 0.3 hours.
- For OWL, the VMRS Component Code is 002-011-027.
- **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.

**March 2011  
FL587A  
NHTSA #11V-008  
Transport Canada #11-010**

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](http://AccessFreightliner.com) / Support / My Tickets and 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

March 2011  
FL587A  
NHTSA #11V-008  
Transport Canada #11-010

## Copy of Letter to Owner

### Subject: Freightliner Business Class M2 Seat Belt Anchor Backing Plates

**For the Notice to U.S. Customers:** This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

**For the Notice to Canadian Customers:** This notice is sent to you in accordance with the Canadian Motor Vehicles Safety Act.

Daimler Trucks North America LLC (DTNA), on behalf of its Freightliner Trucks Division, has decided that a defect which relates to motor vehicle safety exists on specific Freightliner Business Class M2 model vehicles manufactured August 25, 2009, through September 3, 2009, at the Santiago truck manufacturing plant.

Certain Business Class M2 vehicles may have been manufactured with out-of-specification inboard (buckle end) seat belt anchor backing plates. Although these vehicles comply with FMVSS 210 (Seat Belt Assembly Anchorages), they do not meet DTNA design specifications. In the event of a crash, the seat belt anchorage may not perform as expected, increasing the risk of injury. Some vehicles have already had the seat belt anchorages brought up to DTNA design standards.

Potentially affected vehicles will be inspected and those that have not already been modified, will have the existing seat belt anchor bolt replaced and two hardened washers and a jam nut added.

Please contact an 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 an authorized dealer, search online at [www.Daimler-TrucksNorthAmerica.com](http://www.Daimler-TrucksNorthAmerica.com). The Recall will take up to 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 **FL587A**.

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.

**For the Notice to U.S. Customers:** If you have questions about this Recall, 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 after normal business hours. 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, you may 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>.

**For the Notice to Canadian Customers:** If you have questions about this Recall, 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 after normal business hours.

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.

# Recall Campaign

Daimler Trucks  
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March 2011  
FL587A  
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Transport Canada #11-010

## Work Instructions

### Subject: Freightliner Business Class M2 Seat Belt Anchor Backing Plates

**Models Affected:** Specific Freightliner Business Class M2 model vehicles manufactured August 25, 2009, through September 3, 2009, at the Santiago truck manufacturing plant.

IMPORTANT: Approximately 45 percent of vehicles are expected to need the new hardware installed.

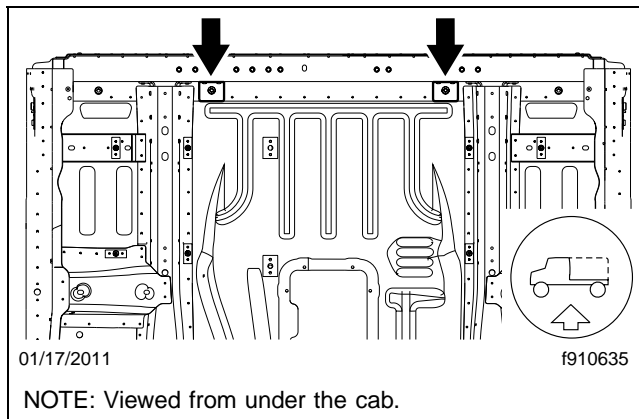
#### Seat Belt Tether Anchor Inspection and Repair

1. Check the base label (Form WAR259) for a completion sticker for FL587 (WAR260) indicating this work has been completed. The base label is usually located on the passenger-side door about 12 inches (30 cm) below the door latch. If a completion sticker is present, no further work is needed. If a completion sticker is not present, proceed to the next step.
2. Shut down the engine, set the parking brake, and chock the tires.
3. Under the cab, inspect the backing plates for the *inboard* tether belt anchors. They are located on the underside of the cab floor, just inboard of the longitudinal reinforcements, as shown in **Fig. 1** and **Fig. 2**.

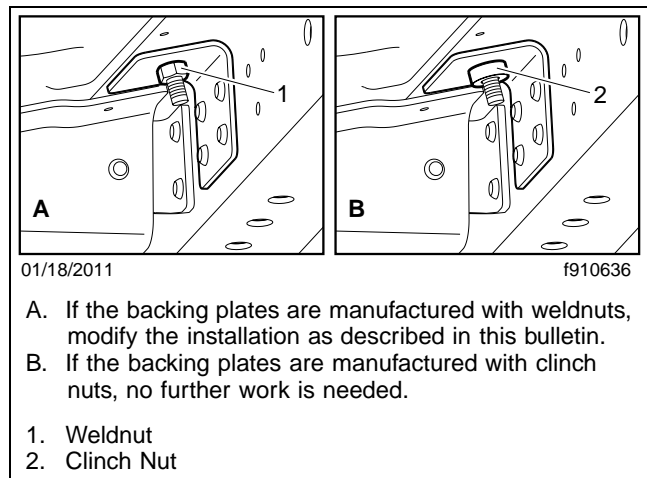
If the backing plates are manufactured with *clinch nuts*, no further work is needed. Clean a spot on the base label and attach a completion sticker for FL587 to the base label.

If the backing plates are manufactured with *weldnuts*, continue to the next step and modify the installation as follows.

4. From inside the cab, remove the 1-1/2-inch long bolts from both the *inboard* tether belt anchors. Discard the bolts and the paper retaining washers, if present. See **Fig. 3**.



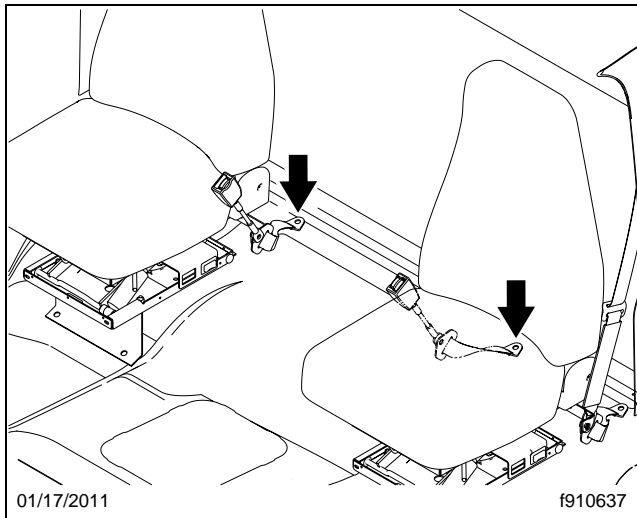
**Fig. 1, Locations of Inboard Tether Anchor Backing Plates**



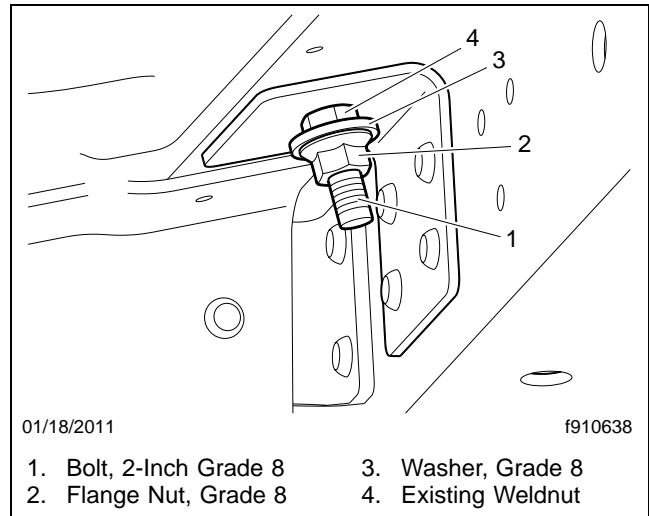
**Fig. 2, Tether Belt Backing Plate**

**IMPORTANT:** Do not reuse tether anchor bolts that have been torqued to full load.

5. Install a new 2-inch long, grade 8 bolt (23-09439-200) and grade 8 washer (23-09114-001) from the kit at each inboard tether anchor. Tighten the bolts 35 to 45 lbf-ft (48 to 60 N·m).
6. Under the cab, install a grade 8 washer (23-09114-017) and a grade 8 flange nut (23-13223-007) from the kit on each bolt. See **Fig. 4**. Tighten the flange nuts 35 to 45 lbf-ft (48 to 60 N·m).



**Fig. 3, Inboard Tether Belt Anchor Bolts**



**Fig. 4, Modified Tether Mount Backing Plate Installation**

7. Clean a spot on the base label and attach a completion sticker for FL587 to the base label.
8. Remove the chocks from the tires.