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

August 13, 2013

Nancy Lewis
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-643, Fuel Line

Ms. Lewis,

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 175 Thomas Built Buses Saf-T-Liner EF, Saf-T-Liner EFX, Saf-T-Liner HDX school buses manufactured January 1, 2012 through October 4, 2012, and equipped with an auxiliary fuel pickup tube for use with an optional chassis heater.

Attached is Daimler Trucks North America's Defect Information Report.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Amy Martin, Chief Counsel, CAL-OSHA
Enclosure
Certified Mail #70032260000134042488

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Defect Information Report

(Section 573.6)

August 13, 2013

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

Brands: Thomas Built Buses

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

Model(s) affected: School Bus models Saf-T-Liner EF, Saf-T-Liner EFX, Saf-T-Liner HDX

Model Years affected: 2013 and 2014

Manufacture Dates: January 1, 2012 through October 4, 2012

Basis for determining population: Saf-T-Liner EF, Saf-T-Liner EFX, and Saf-T-Liner HDX model school buses assembled January 1, 2012 through October 4, 2012 and equipped with an auxiliary fuel pickup tube for use with an optional chassis heater.

Component manufacturer if other than the vehicle manufacturer: Not Applicable

(c)(3) **Total number of vehicles potentially affected:** Approximately 175
(50 of these 175 units were inspected as part of the Thomas Bus investigation. Owners of these 50 buses will not be notified as part of this campaign.)

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

(c)(5) **Description of the defect:** An information label may detach from the auxiliary heater fuel pickup tube after immersion in diesel fuel for a period of time. Once detached a submerged label may block the engine fuel suction tube restricting and/or stopping the flow of fuel to the engine, potentially causing the engine to stumble or run erratically. In the worst case the engine may shut down temporarily.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: Should the bus shut down unintentionally the driver may not be able to completely exit the roadway potentially putting the students at increased risk of injury while being transferred to another bus.

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

September 2012 – Thomas Bus received complaints of buses running sluggish, stumbling, and stalling while in operation. It was reported that affected buses continued to operate after the symptoms first manifested themselves. In cases where the engines stalled, the engines could be restarted after the unit sat for a short period.

October 2012 – Affected units were inspected and it was determined that an information label may intermittently block the inlet of the engine fuel suction tube. Thomas Bus reviewed its manufacturing process to ensure all information labels were removed from components inserted into the fuel tanks. Reports of failures demonstrated a low probability of occurrence, and customer feedback indicated that bus operators experiencing the condition were able to continue to operate buses or safely exit the roadway until the bus could be restarted. The issue was understood to be a customer satisfaction issue.

November 2012 – July 2013 – Thomas Bus continued to investigate and monitor the situation.

July 2013 – NHTSA opens PE13-006 to investigate allegations of buses stalling due to debris in fuel tanks. Thomas Bus conducted a series of test to better understand the characteristics of an affected bus.

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August 2013 – Daimler Trucks reviewed the relevant information and decided that although operators of affected buses had adequate warning and affected buses continued to operate for some time when experiencing this condition, out of an abundance of caution, a safety campaign will be conducted in lieu of a customer satisfaction campaign to inspect all potentially affected buses to ensure the information label, if present, is removed from the tank.

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

(c)(8) (i) Remedial program: Fuel tanks will be inspected for the presence of a label. If a label is found, it will be removed from the tank. 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 no later than October 18, 2013. Dealer and distributor notification will be completed no later than October 18, 2013

(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-643