

# DAIMLER

Daimler Trucks North America  
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Senior Manager  
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September 30, 2013

Ms. Jennifer Timian  
Chief, Recall Management Division  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington DC 20590

## **Re: FL-645, Western Star Seat belt Anchor Plate**

Dear Ms. Timian,

This is in response to your question regarding the Western Star seat belt anchor nut plate recall chronology.

We have been using the same nut plate for seat belt anchorage for several models since 1997. This nut plate, which included a welded nut design and then changed to a projection weld nut later in 2009, had passed several FMVSS seat belt pull test on at least 6 different cabs collectively since 1997. Therefore it deserved every expectation to have exceeded performance expectations.

In mid-February 2013, during a test of newly designed seat with battery box provisions, the already tested and passed nut plate exhibited certain deformation issues. DTNA began to investigate the issue. Even though both nut plate versions had passed the previous tests and found acceptable, out of an abundance of caution, on April 1st, 2013, the plate was switched to the more robust welded nut version until further analysis is performed.

The analysis was to include: 1- The difference, if any, between the welded nut Vs. projection welded nut was to be determined. 2- Alignment of the nut plate on the subject vehicle was to be studied. 3- Misalignment of two sheet metals supporting the nut plate was to be determined and taken into consideration. 4- The amount of misalignment on the test vehicle vs. the rest of the population was to be studied. 5- The reason for both versions of the plates passing the requirements and exhibiting issues on the one subject test vehicle was to be understood. 6- The systemic nature of the issue was to be determined. From April through August 2013, DTNA spent time to work through these analysis. As part of the analysis, it was determined that on the subject test vehicle, certain misalignment of two B-pillar reinforcement plates may have rendered a small portion of the nut plate edge unsupported potentially resulting in exceeding acceptable deflection criteria.

While DTNA had not found unreasonable risk to motor vehicle safety, it was clear that completion of all of the various findings, validation and statistical analysis will take more time and effort. That is why DTNA decided to perform a recall in place of further investigation and additional time and effort. The field fix is determined to keep the projection weld design nut plates and add certain fasteners and plate to better support the nut plate even in the potential presence of any misalignment.

Please let me know if there are any questions.

Best regards,

A handwritten signature in black ink that reads "Nasser Zamani". The signature is written in a cursive, flowing style.

Nasser Zamani