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14V-074  
(3 pages) Amended

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

May 30, 2014

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: Amended Defect Information Report FL-659, Minotour Floor Reinforcements**

Ms. Lewis,

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Daimler Trucks North America LLC herewith reports an amended safety campaign to recall approximately 283 additional Thomas Built Buses Minotour Dual Rear Wheel school buses equipped with certain IMMI or S3C 3-passenger seats, or Syntec passenger seats, and manufactured between October 21, 2011, and January 16, 2014, without rear floor reinforcement channels bringing the total number of School buses to approximately 570.

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

A Daimler Company

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## Amended Defect Information Report (Section 573.6)

May 30, 2014

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

**Brands:** Thomas Built Buses

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

**Model(s) affected:** Minotour Dual Rear Wheel (DRW) School Buses

**Model Years affected:** 2013, 2014, and 2015

**Manufacture Dates:** October 21, 2011, through January 16, 2014

**Basis for determining population:** Minotour DRW +10 style units equipped with certain 3-passenger IMMI or S3C brand seats, or Syntec brand seats, installed in the rear section of the bus

**(c)(3) Total number of vehicles potentially affected:** Approximately 570

**(c)(4) Percentage of vehicles estimated to contain the defect:** 100%

**(c)(5) Description of the defect:** On affected vehicles floor reinforcement channels designed to provide additional support to the seat belt anchorage system were inadvertently omitted during the manufacturing process.

**49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety:** Omitted floor reinforcement channels may decrease the effectiveness of the seat belt system, and increase the risk of injury during a crash.

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

January 14, 2014, a review of inventory turn rates identified a lack of movement for specific floor reinforcement channels.

January – February 2014, an investigation was conducted to determine where the parts were intended to be used and the projected usage level. When it was confirmed that the reinforcement channels were intended for installation on certain Minotour DRW buses with 10 inch extended rear sections, engineering was notified and requested to determine the purpose of the parts and the potential effects.

February 2014, engineering confirmed that the reinforcement channels were added to specific vehicles for conformance to the October 2011 changes to FMVSS 571.210.

February 14, 2014, Daimler Trucks North America decided to conduct a voluntary safety campaign to retrofit the subject vehicles with reinforcement channels.

DTNA continued to investigate the potential effects of the omitted floor reinforcements on other seat configurations. In late April 2014 testing indicated that buses equipped with Syntec seats may also be affected by this issue. DTNA identified the additional buses that may be affected and on May 30, 2014, amended the recall to include the additional buses.

**(c)(8) (i) Remedial program:** Reinforcement channels will be added to the rear floor sections of the subject vehicles. 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 began on approximately April 20, 2014 and will be completed by July 17<sup>th</sup>, 2014

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Dealer and distributor notification began on approximately April 20, 2014 will be completed by July 17<sup>th</sup>, 2014.

**(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-659