DAIMLER

Daimler Trucks North America

Nasser Zamani
Senior Manager
Compliance and Regulatory Affairs

May 1, 2014

Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215, Rm. W45-206)
1200 New Jersey Avenue S.E.
Washington D.C. 20590

RE: Defect Information Report – Supplemental Report No. 1
FL-661, IMMI Seat Belt Buckles, 14V-150
Representative Dealer Notice

Ms. Lewis,

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)(8)(ii)	Dealer and distributor notification: Began and ended: April 25, 2014
(c)(10)	A copy of communications sent to dealers is attached.

Please contact me if you have any questions, or concerns.

Sincerely yours,

Nasser Zamani

Cc: Amy Martin, CAL-OSHA
Attachment

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

Daimler Trucks
North America LLC

Recall Campaign

March 2014
FL654A-Z/FL661C-Z
NHTSA #13V-604 and #14V-150 (Non-School Buses)
NHTSA #13V-606 (School Buses)
Transport Canada #13-427
SECOND REVISED NOTICE

Subject: IMMI Seat Belt Buckles

Models Affected: Specific Freightliner 108SD, 114SD, 122SD, Argosy, Business Class M2, Cascadia, Columbia, and Coronado vehicles; Western Star 4700, 4900, and 6900 vehicles; and Thomas Built Buses Saf-T-Liner C2, HDX, and Minotour vehicles with certain IMMI seat belt assemblies.

General Information

ATTENTION: Locations that are authorized to perform campaigns on Freightliner and Western Star vehicles and Freightliner Custom Chassis chassis should complete this Recall on those vehicles. Locations that are authorized to perform campaigns on Thomas Built Buses bodies and chassis should complete this Recall on those vehicles.

Daimler Trucks North America LLC, on behalf of its Freightliner Trucks Division and its wholly owned subsidiary Thomas Built Buses, has decided that a non-compliance with Federal regulations exists on the vehicles mentioned above.

There are approximately 33,000 vehicles involved in this campaign.

Certain Indiana Mills and Manufacturing, Inc. (IMMI) seat belt assemblies equipped with L9 buckles may not satisfy the requirements of S4.3(g) of FMVSS 209/CMVSS 209, Seat Belt Assemblies. When the push button on the buckle is pressed to release the latch plate for egress, the latch plate can become partially engaged with the buckle. In the event of an accident or emergency, occupants may be unable to exit the vehicle immediately and an injury could occur.

Seat belt assemblies will be inspected and replacement buckles will be installed as required. In trucks, most buckles are expected to be replaced. In school buses, replacements are expected to vary from a few buckles to all buckles. Customers are being informed that parts are currently being manufactured, and they should contact a dealer in advance to ensure that parts are available.

REVISIONS: The U.S. vehicles previously added to the Recall have been moved under a separate recall number, FL661 and NHTSA #14V-150, to comply with a directive from NHTSA. The repair procedure is the same and all vehicles in both FL654 and FL661 will use the kits with "FL654" in the kit number (for example, FL654C and FL661C are the same except for the recall number and will both use 25-FL654-006).

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 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 parts are now available and can be obtained by ordering the kit number(s) listed below from your facing Parts Distribution Center.

March 2014
FL654A-Z/FL661C-Z
NHTSA #13V-604 and #14V-150 (Non-School Buses)
NHTSA #13V-606 (School Buses)
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If our records show your dealership has ordered any vehicles involved in campaign number FL654 or FL661, 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.

Vehicles in each group in this Recall may use any one or combination of the following kits:

- FL654A – School Buses (123 Vehicles)

  25-FL654-000 25-FL654-001 25-FL654-002
- FL654B – School Buses (22 Vehicles)

  25-FL654-003 25-FL654-004 25-FL654-005
- FL654C and FL661C– Trucks (9,183 Vehicles)

  25-FL654-006
- FL654D and FL661D – Trucks (6,734 Vehicles)

  25-FL654-006 25-FL654-007 25-FL654-010 25-FL654-011 25-FL654-044
- FL654E – Trucks (4,640 Vehicles)

  25-FL654-006 25-FL654-008
- FL654F and FL661F – Trucks (2,095 Vehicles)

  25-FL654-006 25-FL654-009
- FL654G and FL661G – Trucks (2,049 Vehicles)

  25-FL654-006 25-FL654-010
- FL654H and FL661H – Trucks (2,107 Vehicles)

  25-FL654-006 25-FL654-024 25-FL654-025 25-FL654-030
- FL654I and FL661I – Trucks (841 Vehicles)

  25-FL654-008 25-FL654-014 25-FL654-025 25-FL654-030 25-FL654-031 25-FL654-032

  25-FL654-033 25-FL654-034
- FL654J and FL661J – Trucks (753 Vehicles)

  25-FL654-011 25-FL654-015 25-FL654-017 25-FL654-018 25-FL654-020 25-FL654-028
- FL654K and FL661K – Trucks (733 Vehicles)

  25-FL654-009 25-FL654-014 25-FL654-025 25-FL654-030 25-FL654-031 25-FL654-032
- FL654L and FL661L – Trucks (684 Vehicles)

  25-FL654-006 25-FL654-017
- FL654M and FL661M – Trucks (657 Vehicles)

  25-FL654-006 25-FL654-018 25-FL654-019 25-FL654-028 25-FL654-045
- FL654N and FL661N – Trucks (601 Vehicles)

  25-FL654-012 25-FL654-014
- FL654O – Trucks (461 Vehicles)

  25-FL654-004

- FL654P and FL661P – Trucks (442 Vehicles)

  25-FL654-006 25-FL654-015

- FL654Q and FL661Q – Trucks (237 Vehicles)

  25-FL654-008 25-FL654-013 25-FL654-027

- FL654R and FL661R – Trucks (147 Vehicles)

  25-FL654-013 25-FL654-014 25-FL654-024 25-FL654-025 25-FL654-030

- FL654S and FL661S – Trucks (249 Vehicles)

  25-FL654-014 25-FL654-021 25-FL654-022 25-FL654-023 25-FL654-024 25-FL654-025

  25-FL654-029 25-FL654-030 25-FL654-031 25-FL654-032 25-FL654-033 25-FL654-034

- FL654T and FL661T – Trucks (122 Vehicles)

  25-FL654-035 25-FL654-036 25-FL654-037 25-FL654-038 25-FL654-039 25-FL654-040

- FL654U FL661U – Trucks (217 Vehicles)

  25-FL654-006 25-FL654-008 25-FL654-009 25-FL654-021 25-FL654-022 25-FL654-025

  25-FL654-030 25-FL654-031 25-FL654-033 25-FL654-032 25-FL654-034

- FL654V and FL661V – Trucks (62 Vehicles)

  25-FL654-010 25-FL654-015

- FL654W and FL661W – Trucks (79 Vehicles)

  25-FL654-025 25-FL654-030

- FL654X and FL661X – Trucks (66 Vehicles)

  25-FL654-017 25-FL654-041

- FL654Y and FL661Y – Trucks (56 Vehicles)

  25-FL654-018 25-FL654-028 25-FL654-041

- FL654Z and FL661Z – Trucks (240 Vehicles)

  25-FL654-006 25-FL654-007 25-FL654-011 25-FL654-013 25-FL654-014 25-FL654-016

  25-FL654-020 25-FL654-021 25-FL654-022 25-FL654-023 25-FL654-024 25-FL654-025

  25-FL654-026 25-FL654-027 25-FL654-029 25-FL654-030 25-FL654-031 25-FL654-032

  25-FL654-033 25-FL654-034 25-FL654-038 25-FL654-041

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FL654A-Z/FL661C-Z
NHTSA #13V-604 and #14V-150 (Non-School Buses)
NHTSA #13V-606 (School Buses)
Transport Canada #13-427
SECOND REVISED NOTICE

Table 1 - Replacement Parts for FL654 and FL661

25-FL654-000 through 25-FL654-045

Campaign Number	Kit Number	Buckle Part Number	Part Description	Qty. per Kit	Suggested Wholesale*
FL654AB (School Buses)	25-FL654-000	A95064	Buckle	1 ea	$10.97 U.S. $11.41 CAN
	25-FL654-001	A96477	Buckle	1 ea	
	25-FL654-002	A96655	Buckle	1 ea	
	25-FL654-003	F111539RPL	Buckle	1 ea	
	25-FL654-004	F111540RPL	Buckle	1 ea	
	25-FL654-005	F111541RPL	Buckle	1 ea	
FL654C-Z FL661C-Z (Trucks)	25-FL654-006	A93555	Buckle	1 ea	$10.97 U.S. $11.41 CAN
	25-FL654-007	A93559	Buckle	1 ea	
	25-FL654-008	A93706	Buckle	1 ea	
	25-FL654-009	A93764	Buckle	1 ea	
	25-FL654-010	A96474	Buckle	1 ea	
	25-FL654-011	A93542	Buckle	1 ea	
	25-FL654-012	A100397	Buckle	1 ea	
	25-FL654-013	A101245	Buckle	1 ea	
	25-FL654-014	A91317	Buckle	1 ea	
	25-FL654-015	A93455	Buckle	1 ea	
	25-FL654-016	A93541	Buckle	1 ea	
	25-FL654-017	A93603	Buckle	1 ea	
	25-FL654-018	A93608	Buckle	1 ea	
	25-FL654-019	A93620	Buckle	1 ea	
	25-FL654-020	A93655	Buckle	1 ea	
	25-FL654-021	A93712	Buckle	1 ea	
	25-FL654-022	A93713	Buckle	1 ea	
	25-FL654-023	A93714	Buckle	1 ea	
	25-FL654-024	A93725	Buckle	1 ea	
	25-FL654-025	A93726	Buckle	1 ea	
	25-FL654-026	A93727	Buckle	1 ea	
	25-FL654-027	A93760	Buckle	1 ea	
	25-FL654-028	A93762	Buckle	1 ea	
	25-FL654-029	A93766	Buckle	1 ea	
	25-FL654-030	A93767	Buckle	1 ea	
	25-FL654-031	A93768	Buckle	1 ea	
	25-FL654-032	A93769	Buckle	1 ea	
	25-FL654-033	A93772	Buckle	1 ea	
	25-FL654-034	A93773	Buckle	1 ea	
	25-FL654-035	A93832	Buckle	1 ea	

Table 1, Continues on the Next Page

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NHTSA #13V-604 and #14V-150 (Non-School Buses)
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Campaign Number	Kit Number	Buckle Part Number	Part Description	Qty. per Kit	Suggested Wholesale*
FL654C-Z FL661C-Z Trucks	25-FL654-036	A93833	Buckle	1 ea	$10.97 U.S. $11.41 CAN
	25-FL654-037	A93834	Buckle	1 ea	
	25-FL654-038	A93835	Buckle	1 ea	
	25-FL654-039	A93837	Buckle	1 ea	
	25-FL654-040	A93838	Buckle	1 ea	
	25-FL654-041	A95244	Buckle	1 ea	
	25-FL654-042	A96522 (ICP BAR)	Buckle	1 ea	
	25-FL654-043	A96805	Buckle	1 ea	
	25-FL654-044	A99639	Buckle	1 ea	
	25-FL654-045	A93614	Buckle	1 ea	

* Please charge all U.S. and Canadian Direct Warranty Customers the above-listed price for the kit, as they are authorized to perform their own Recalls. This pricing does not apply to Export Distributors.

Table 1, Continued from the Previous Page

Removed Parts

U.S. and Canadian Dealers, please follow Warranty Failed Parts Tracking shipping instructions for the disposition of all removed parts. Export distributors, please destroy removed parts unless otherwise advised.

Labor Allowance

Table 2 - Labor Allowance

Campaign Number	Procedure	Time Allowed (hours)	SRT Code	Correction Code
FL654AB (School Buses)	Inspect all seat belt buckles - Saf-T-Liner C2 or HDX (Claim once on each C2 or HDX claim)	0.4	996-0923A	06 - Inspect
	Inspect all seat belt buckles - Minotour (Claim once on each Minotour claim)	0.2	996-0923B	06 - Inspect
	Replace 1 seat belt buckle - Saf-T-Liner C2, HDX, or Minotour (Claim once for each buckle replaced)	0.2	996-0923C	12 - Repair Recall/Campaign
FL654C-Z FL661C-Z (Trucks)	Inspect all seat belt buckles - All trucks	0.2	996-0923D	06 - Inspect
	Inspect all and replace 1 to 2 seat belt buckles - All trucks	0.5	996-0923E	12 - Repair Recall/Campaign
	Inspect all and replace 3 to 5 seat belt buckles - All trucks	0.7	996-0923F	12 - Repair Recall/Campaign

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.

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Claims for Credit

You will be reimbursed for your parts, labor, and handling (landed cost for Export Distributors) by submitting your claim through the Warranty system within 30 days of completing this campaign. Please reference the following information in OWL:

REVISIONS: The U.S. vehicles previously added to the Recall have been moved under a separate recall number, FL661 and NHTSA #14V-150, to comply with a directive from NHTSA. The repair procedure is the same and all vehicles in both FL654 and FL661 will use the kits with "FL654" in the kit number (for example, FL654C and FL661C are the same except for the recall number and will use 25-FL654-006).

- Claim type is **Recall**.
- In the FTL Authorization field, enter the campaign number and appropriate condition code (e.g. **FL654A, FL654B, FL654C, FL661C, FL661B, etc.**).
- In the Primary Failed Part Number field, enter **25-FL654-000**.
- In the Parts field, enter the appropriate kit number(s) as shown in the Replacement Parts Table. At the end of this bulletin is a cross reference list of seat or seat belt assemblies to individual buckle and kit numbers. This list may be helpful in selecting the correct replacement buckles.
- In the Labor field, first enter the appropriate SRT from the Labor Allowance Table. For administrative time, enter SRT 939-6010A for 0.3 hours.
- **For school buses with more than one buckle replaced, claims must be brought into OWL manually. Please submit a WSC Campaigns inquiry asking for your "Ready to Submit" recall claim to be brought into OWL.**
- For OWL, the VMRS Component Code is 002-011-005 and the Cause Code is A1 - Campaign.
- **U.S. and Canada – 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 Other Charges section.
    - In the claim story, first note the authorization number and that the claim includes a reimbursement.
    - 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: OWL 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.

U.S. and Canadian dealers, 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 / 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. Export distributors, submit a Web inquiry or contact your International Service Manager.

U.S. and Canadian Dealers: 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. Export Distributors: Excess inventory is not returnable.

The letter notifying U.S. and Canadian 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.

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Copy of Notice to Owners

Subject: IMMI Seat Belt Buckles

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 Vehicle Safety Act.

Daimler Trucks North America LLC, on behalf of its Freightliner Trucks Division and its wholly owned subsidiary Thomas Built Buses, has decided that a non-compliance with Federal regulations exists on specific Freightliner 108SD, 114SD, 122SD, Argosy, Business Class M2, Cascadia, Columbia, and Coronado vehicles; Western Star 4700, 4900, and 6900 vehicles; and Thomas Built Buses Saf-T-Liner C2, HDX, and Minotour vehicles with certain IMMI seat belt assemblies.

Certain Indiana Mills and Manufacturing, Inc. (IMMI) seat belt assemblies equipped with L9 buckles may not satisfy the requirements of S4.3(g) of FMVSS 209/CMVSS 209, Seat Belt Assemblies. When the button is pressed to release the seat belt, the latch plate can become partially engaged with the buckle, and it may take more effort than specified in the standard to separate the latch plate from the buckle. If the latch plate remains partially engaged after the button is pressed, egress from the vehicle could be hindered which would increase the risk of injury in the event of an emergency.

Seat belt assemblies will be inspected and replacement buckles will be installed as required.

Please contact an authorized Daimler Trucks North America dealer to arrange to have the recall performed. **IMPORTANT: Parts are currently being manufactured, please contact a dealer in advance to ensure that parts are available.** To locate an authorized dealer, search online at www.Daimler-TrucksNorthAmerica.com. The Recall may take up to several hours on buses and up to an hour on all other vehicles, depending on the number and type of buckles requiring replacement, and will be performed at no charge to you.

You may be liable for any progressive damage that results from your failure to complete the Recall within a reasonable time after receiving notification.

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, or the Customer Assistance Center at (800) 385-4357 after normal business hours. If you are not able to have the defect remedied without charge and within a reasonable time, 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, or the Customer Assistance Center at (800) 385-4357 after normal business hours.

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We regret any inconvenience this action may cause but feel certain you understand our interest in motor vehicle safety.

WARRANTY CAMPAIGNS DEPARTMENT

Enclosure

March 2014
FL654A-Z/FL661C-Z
NHTSA #13V-604 and #14V-150 (Non-School Buses)
NHTSA #13V-606 (School Buses)
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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.

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Work Instructions

Subject: IMMI Seat Belt Buckles

Models Affected: Specific Freightliner 108SD, 114SD, 122SD, Argosy, Business Class M2, Cascadia, Columbia, and Coronado vehicles; Western Star 4700, 4900, and 6900 vehicles; and Thomas Built Buses Saf-T-Liner C2, HDX, and Minotour vehicles with certain IMMI seat belt assemblies.

ATTENTION: Locations that are authorized to perform campaigns on Freightliner and Western Star vehicles and Freightliner Custom Chassis chassis should complete this Recall on those vehicles. Locations that are authorized to perform campaigns on Thomas Built Buses bodies and chassis should complete this Recall on those vehicles.

REVISIONS: The U.S. vehicles previously added to the Recall have been moved under a separate recall number, FL661 and NHTSA #14V-150, to comply with a directive from NHTSA. The repair procedure is the same and all vehicles in both FL654 and FL661 will use the kits with "FL654" in the kit number (for example, FL654C and FL661C are the same except for the recall number and will use 25-FL654-006).

NOTE: At the end of this bulletin is a cross reference list of seat belt assemblies to individual buckle and kit numbers. This list may be helpful in selecting the correct replacement buckles.

NOTE: For school buses with more than one buckle replaced, claims must be brought into OWL manually. Please submit a WSC Campaigns inquiry asking for your "Ready to Submit" recall claim to be brought into OWL.

L9 Seat Belt Buckle Inspection – All Vehicles

1. Check the base label (Form WAR259) for a completion sticker for FL654 (Form WAR260) indicating this work has been done. 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 work is needed. If a completion sticker is not present, continue with the next step.
2. Park the vehicle on a level surface, shut down the engine, and set the parking brake. Chock the tires.

IMPORTANT: Determine whether or not any seat belt buckles in the vehicle need to be replaced. A vehicle may have some buckles that fall under this recall, and some that may not. It is important to inspect each buckle. In trucks, most buckles are expected to be replaced. In school buses, replacements are expected to vary from a few buckles to all buckles.

3. Check the buckle for the IMMI logo. See **Fig. 1**.
4. Verify that the buckle is an IMMI L9 buckle. Only IMMI L9 buckles are affected by this recall. See **Fig. 2**.
5. If the buckle is an IMMI L9 buckle, check the back of the housing for the date code. See **Fig. 3**.

   If the date code is included in the ranges shown in **Fig. 3**, the buckle needs to be replaced. If the date code is outside these ranges, the buckle does not need to be replaced.

Fig. 1, IMMI Logo

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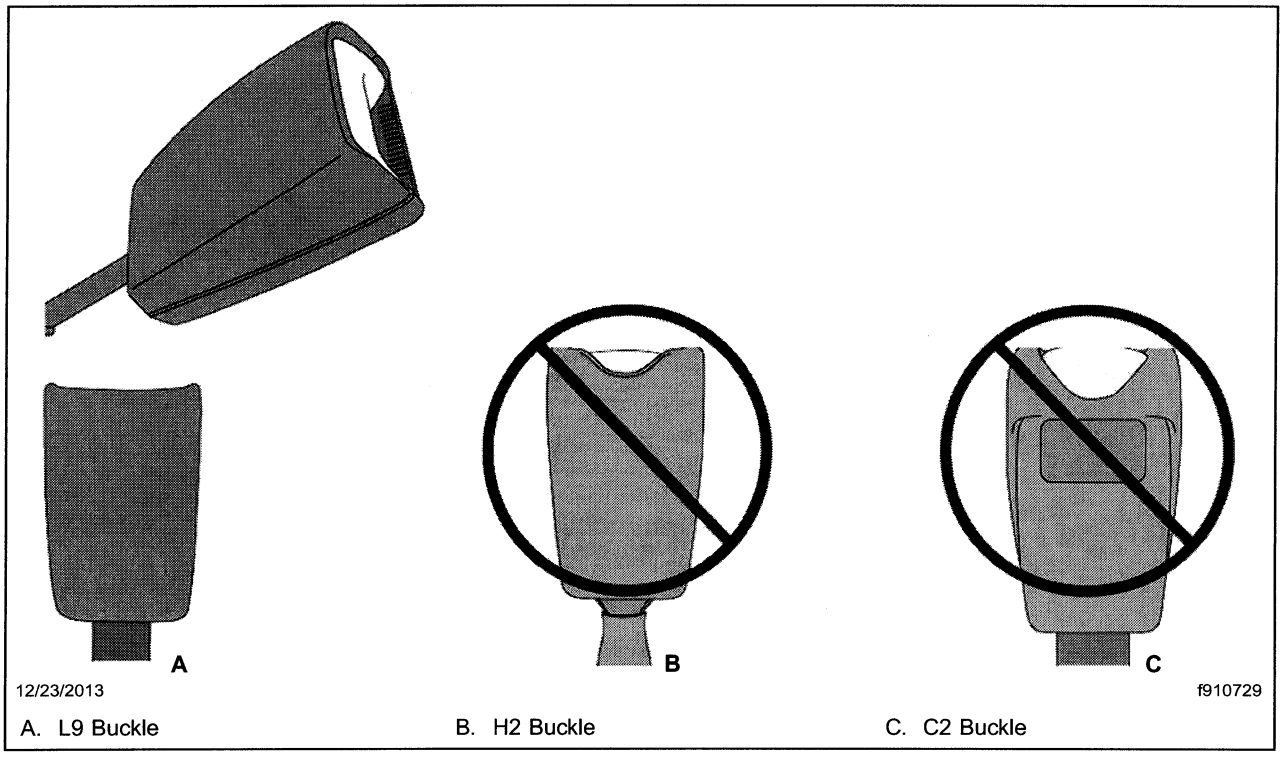
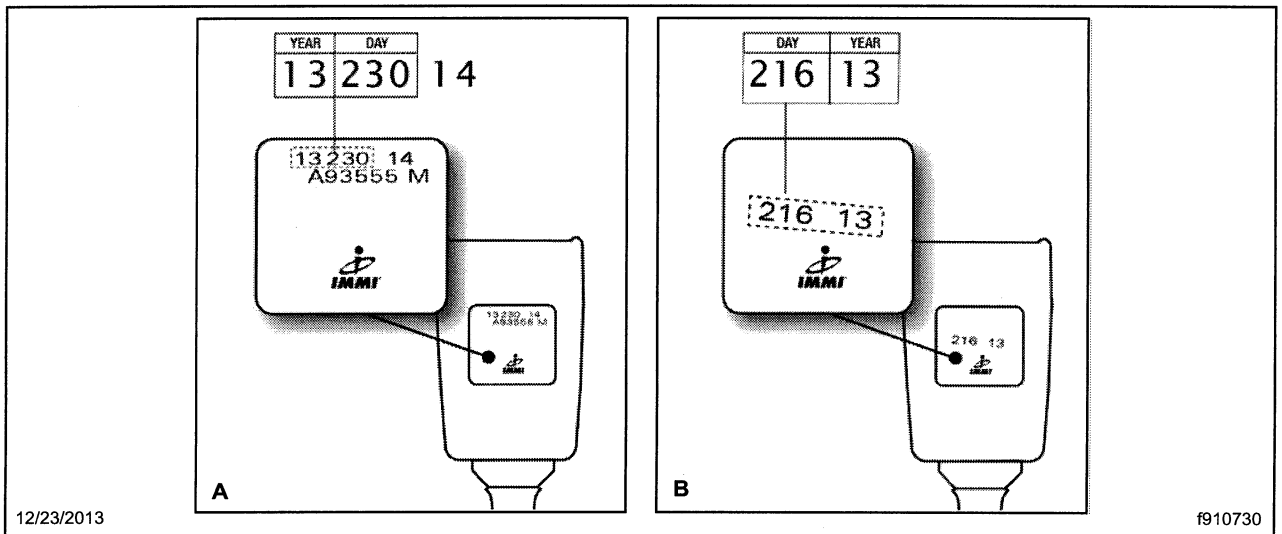


A. L9 Buckle
B. H2 Buckle
C. C2 Buckle

Fig. 2, IMMI L9 Buckle Identification



A. Saltillo, Mexico: suspect code range is 13 220 through 13 256.
B. Westfield, Indiana: suspect code range is 214 13 through 256 13.

Fig. 3, Buckle Date Code Ranges

6. If the vehicle has buckles that need to be replaced, go to "Buckle Replacement – School Buses" or "Buckle Replacement – Trucks" as appropriate in these Work Instructions.

   If no buckles need to be replaced, clean a spot on the base label (Form WAR259), write the recall number, FL654, on a blank red completion sticker (Form WAR260), and attach it to the base label.

Buckle Replacement – School Buses

1. Reach under the center of the bottom cushion and release the latch by sliding the locking plate tab toward the front of the seat, as shown in **Fig. 4**.
2. Lift up the back of the cushion to gain access to the buckle mounting. See **Fig. 5**.
3. Go to the replacement steps below for the applicable type of seat belt assembly:
   - Sliding Buckles
   - Fixed Center-Mounted Buckles
   - Web-Type Buckles
4. When all buckles are replaced, clean a spot on the base label (Form WAR259), write the recall number, FL654, on a blank red completion sticker (Form260), and attach it to the base label.

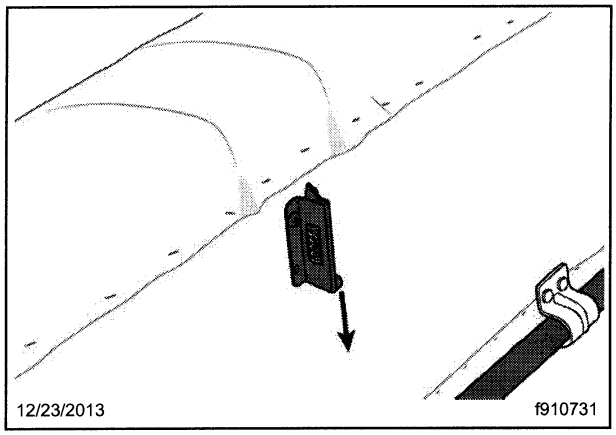


Fig. 4, Releasing the Bottom Cushion Latch

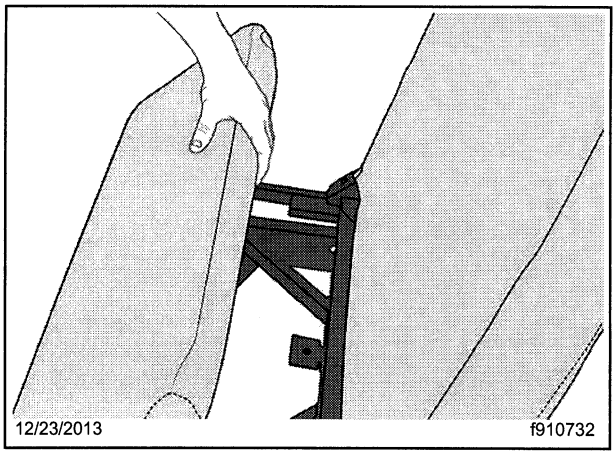


Fig. 5, Lifting Up the Bottom Cushion

Sliding Buckles

NOTE: Sliding buckles are located on the right-hand side when you are facing the seat.

1. Using two 3/4-inch wrenches, remove the nut at one end of the shaft. See **Fig. 6**.
2. Pull the shaft end with the removed nut through the support bracket hole, then slide the plastic sleeve with the buckles off the shaft. See **Fig. 7**.
3. Remove both buckles from the plastic sleeve. Based on the date code of each buckle, discard the suspect buckle(s). If one buckle has a "good" date code, retain it for reinstallation.
4. Install the buckles into the plastic sleeve.
5. Slide the plastic sleeve onto the shaft.
6. Position the shaft in the support bracket holes. Install the nut on the shaft.

March 2014
FL654A-Z/FL661C-Z
NHTSA #13V-604 and #14V-150 (Non-School Buses)
NHTSA #13V-606 (School Buses)
Transport Canada #13-427
SECOND REVISED NOTICE

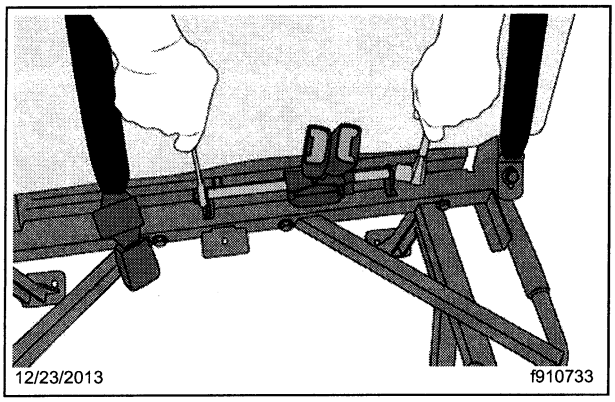


Fig. 6, Removing the Nut at the Shaft End, Sliding Buckles

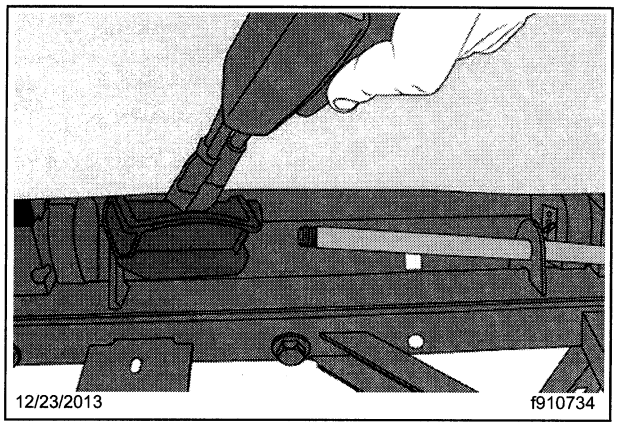


Fig. 7, Removing the Sliding Buckles

Fixed Center-Mounted Buckles

NOTE: Fixed center-mounted buckles are installed in the center of the seat, using one nut and bolt.

1. Using a 5/8-inch ratchet and an 11/16-inch wrench, remove the nut and bolt from the mounting bracket. Remove both buckles. Based on the date code of each buckle, discard the suspect buckle(s). If one buckle has a "good" date code, retain it for reinstallation. See **Fig. 8**.
2. Install both buckles, using the bolt and nut. Tighten the nut 25 lbf·ft (34 N·m).

Web-Type Buckle

1. Using a 5/8-inch wrench and a 11/16-inch wrench, remove the buckle mounting bolt. Remove the buckle, nut, and washer. See **Fig. 9**.
2. Orient the new buckle as before, then install it, using the bolt, nut, and washer. Tighten the nut 25 lbf·ft (34 N·m).

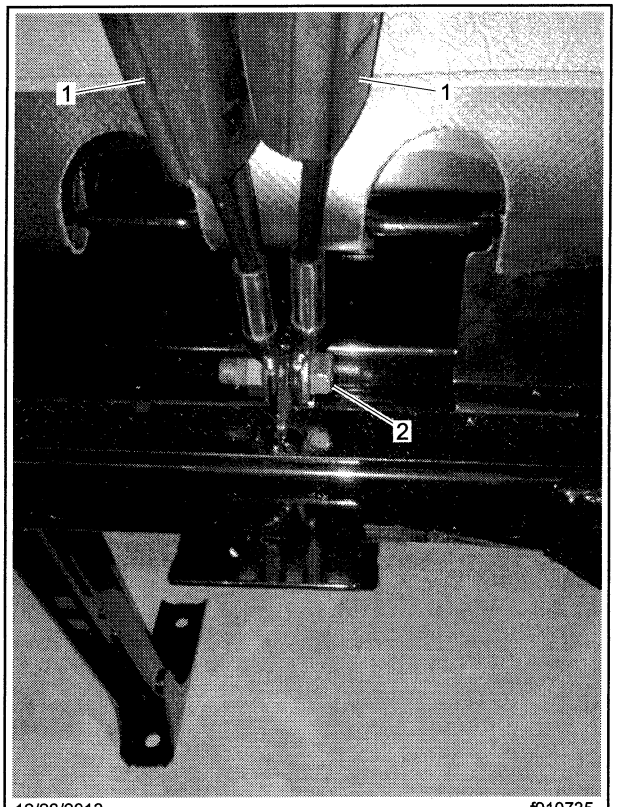
Buckle Replacement – Trucks

There are several buckle mounting configurations, depending on the type of seat:

- Static seats have the buckles mounted directly to the cab floor. See **Fig. 10**.
- Air suspension seats have buckles mounted to the ICP (intermediate-connection-point bar or bracket), with a tether belt attached to the cab floor. See **Fig. 11**.
- Bench seats may have floor-mounted buckles at the ends, and floor-bracket-mounted buckles in the middle. One or two buckles may be mounted to each floor bracket. See **Fig. 12** and **Fig. 13**.

1. Go to the replacement steps below for the applicable type of seat belt assembly:
    - FLoor-Mounted Buckles
    - ICP-Bar-Mounted Buckles
    - Floor-Bracket-Mounted Buckles

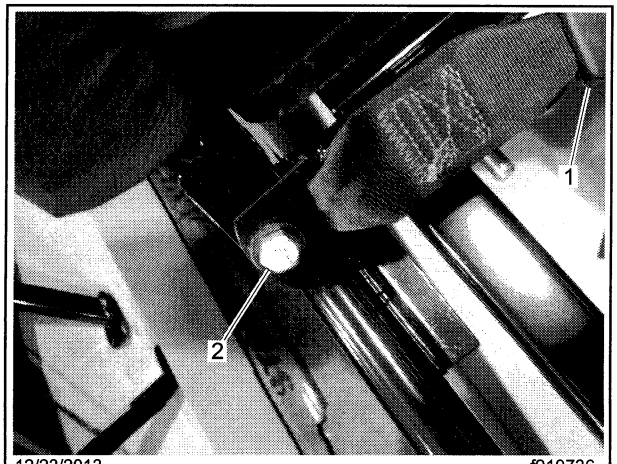
March 2014
FL654A-Z/FL661C-Z
NHTSA #13V-604 and #14V-150 (Non-School Buses)
NHTSA #13V-606 (School Buses)
Transport Canada #13-427
SECOND REVISED NOTICE



12/23/2013 f910735

1. Buckle 2. Bolt

Fig. 8, Fixed Center-Mounted Buckles



12/23/2013 f910736

1. Buckle 2. Bolt

Fig. 9, Webbed Buckle

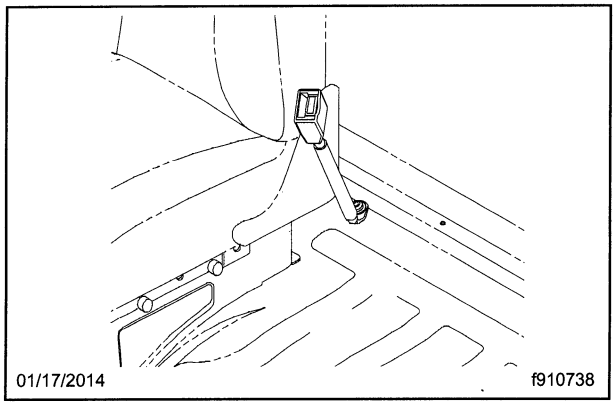


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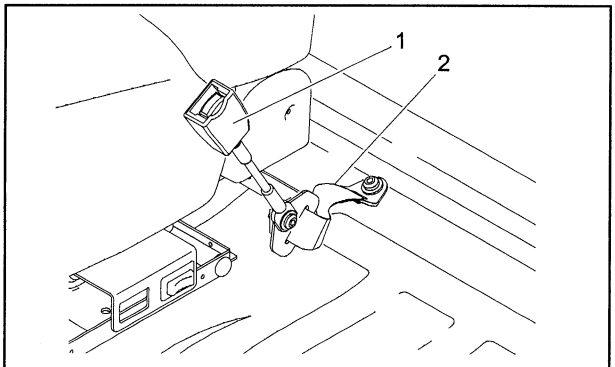
Fig. 10, Floor-Mounted Buckle



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1. Buckle 2. Tether Belt

Fig. 11, ICP-Bar-Mounted Buckle

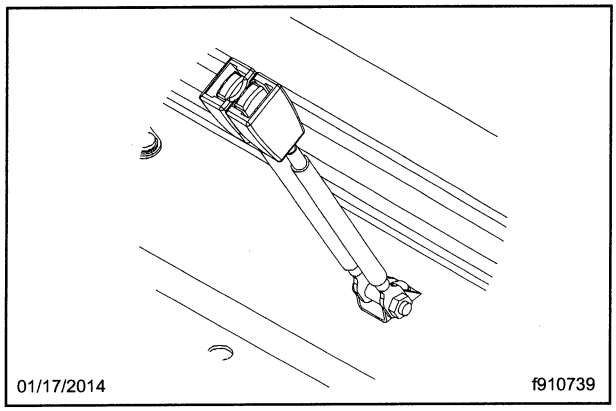

Fig. 12, Floor-Bracket-Mounted Buckle, Dual Buckle Mounting

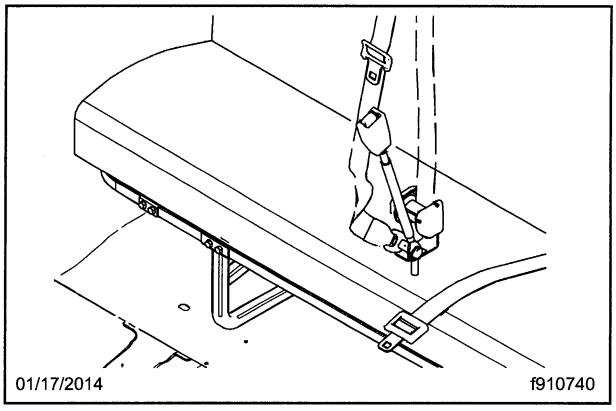

Fig. 13, Floor-Bracket-Mounted Buckle, Retractor and Buckle Mounting

2. When all buckles are replaced, clean a spot on the base label (Form WAR259), write the recall number, FL654, on a blank red completion sticker (Form260), and attach it to the base label.

Floor-Mounted Buckles

1. Remove the capscrew that attaches the buckle to the cab deck. See **Fig. 10**. Remove and discard the buckle.
2. Attach the new buckle to the cab deck. Tighten the capscrew 35 to 45 lbf·ft (48 to 61 N·m).

ICP-Bar-Mounted Buckles

1. Disconnect the buckle from the seat by removing the capscrew from the end of the intermediate-connection-point (ICP) bar (or bracket); see **Fig. 11**. Remove and discard the buckle.
2. Place the tether bracket against the ICP bar (or bracket), then place the bracket of the new buckle on top of the tether bracket. Install the capscrew through the brackets into the ICP bar. Tighten the capscrew 35 to 45 lbf·ft (48 to 61 N·m).

Floor-Bracket-Mounted Buckles

1. If necessary, remove the seat cushion to access the buckle mounting.
2. Remove the capscrew that attaches the buckle to the floor bracket (**Fig. 12** or **Fig. 13**). Remove and discard the buckle.
3. Attach the new buckle to the floor bracket. Tighten the capscrew 35 to 45 lbf·ft (48 to 61 N·m).

FL654 IMMI Seat Belt Buckles
Cross Reference List
Seat Belt Assembly to Recall Kit/Buckle Part Number
School Buses

Seat Assembly				Recall Kit	Buckle Part Number
F107181R	F107496R	F107961R	F108096R	25-FL654-000	A95064
F107186R	F107811L	F107991L	F108246L		
F107212L	F107811R	F108247L	F108246R		
F107216L	F107816R	F108247R	F108277R		
F107216R	F107916L	F108251L	F108281L		
F107220L	F107916R	F108251R	F108291L		
F107396L	F107917L	F108262L	F108292L		
F107396R	F107917R	F108266L	F108296L		
F107400R	F107920R	F108276L	F108366L		
F107407L	F107951L	F108276R			
F107407R	F107951R	F108277L			
F107411R	F107961L	F108096L			
F108246L	F108251R	F107396R	F108281L	25-FL654-001	A96477
F108246R	F108262L	F107400R	F108291L		
F108247L	F108266L	F108276R	F108292L		
F108247R	F108276L	F108277L	F108296L		
F108251L	F107396L	F108277R	F108366L		
F107396L	F107396R	F107400R		25-FL654-002	A96655
F108531L	F108537R	F108565L	F108667R	25-FL654-003	F111539RPL
F108531R	F108542L	F108565R	F108672L		
F108536L	F108542R	F108666L	F108672R		
F108536R	F108561L	F108666R	F115232L		
F108537L	F108561R	F108667L			
F107407L	F108536R	F108561R	F108667R	25-FL654-004	F111540RPL
F107407R	F108537L	F108565L	F108672L		
F107411R	F108537R	F108565R	F108672R		
F108531L	F108542L	F108666L	F115232L		
F108531R	F108542R	F108666R			
F108536L	F108561L	F108667L			
F107407L	F108536R	F108561R	F108667R	25-FL654-005	F111541RPL
F107407R	F108537L	F108565L	F108672L		
F107411R	F108537R	F108565R	F108672R		
F108531L	F108542L	F108666L	F115232L		
F108531R	F108542R	F108666R			
F108536L	F108561L	F108667L			

FL654 IMMI Seat Belt Buckles
Cross Reference List
Seat Belt Assembly to Recall Kit/Buckle Part Number
Trucks

Note: The seat belt assembly part number can be found on the seat belt webbing or in PartsPro.

Seat Belt Assembly	Recall Kit	Buckle Part Number
IMM F104989	25-FL654-006	A93555
IMM F105006		
IMM F105125		
IMM F114827		
IMM F114834		
IMM F114835		
IMM F115151		
IMM F115152		
IMM F115154		
IMM F115155		
IMM F115157		
IMM F115158		
IMM F115494		
IMM F13159		
IMM F104990	25-FL654-007	A93559
IMM F105007		
IMM F105123		
IMM F105127		
IMM F111533		
IMM F105150	25-FL654-008	A93706
IMM F105187		
IMM F105166	25-FL654-009 (Also replaces buckle A96765)	A93764
IMM F111098	25-FL654-010	A96474
IMM F114643		
IMM F114836		
IMM F114836		
IMM F114837		
IMM F105059	25-FL654-011	A93542
IMM F105062		
IMM F105092		
IMM F105093		
IMM F105124		
IMM F105128		
IMM F105225		
IMM F123223		

Seat Belt Assembly	Recall Kit	Buckle Part Number
IMM F105009	25-FL654-014	A91317
IMM F105149		
IMM F105152		
IMM F105162		
IMM F105182		
IMM F106779	25-FL654-015	A93455
IMM F106780		
IMM F105041	25-FL654-016	A93541
IMM F105126		
IMM F105143		
IMM F105035	25-FL654-017	A93603
IMM F105224		
IMM F105046	25-FL654-018	A93608
IMM F105196		
IMM F105142	25-FL654-019	A93620
IMM F105060	25-FL654-020	A93655
IMM F116117		
IMM F105178	25-FL654-021	A93712
IMM F105184		
IMM F105197		
IMM F105210		
IMM F105185	25-FL654-021	A93712
	25-FL654-022	A93713
IMM F105198	25-FL654-021	A93712
	25-FL654-022	A93713
IMM F105161	25-FL654-022	A93713
IMM F105211		
IMM F105179	25-FL654-022	A93713
	25-FL654-026	A93727
IMM F105155	25-FL654-023	A93714
IMM F105183		
IMM F105189	25-FL654-024	A93725
	25-FL654-025	A93726
IMM F105168	25-FL654-025	A93726

Seat Belt Assembly	Recall Kit	Buckle Part Number
IMM F104985	25-FL654-025	A93726
	25-FL654-033	A93772
	25-FL654-034	A93773
IMM F116071	25-FL654-012	A100397
IMM F116152		
IMM F121846	25-FL654-013	A101245
IMM F105201	25-FL654-025	A93726
	25-FL654-033	A93772
	25-FL654-034	A93773
IMM F105156	25-FL654-030	A93767
IMM F105238	25-FL654-025	A93726
	25-FL654-030	A93767
IMM F105031	25-FL654-027	A93760
IMM F105089	25-FL654-028	A93762
IMM F111720		
IMM F111721		
IMM F105165	25-FL654-029	A93766
	25-FL654-030	A93767
IMM F105200	25-FL654-029	A93766
	25-FL654-030	A93767
IMM F105157	25-FL654-031	A93768
	25-FL654-032	A93769
IMM F105025	25-FL654-035	A93832
IMM F105026	25-FL654-036	A93833
	25-FL654-037	A93834
IMM F105027	25-FL654-037	A93834
IMM F105028	25-FL654-038	A93835
IMM F106731		
IMM F106737		
IMM F111033		
IMM F111034		
IMM F105030	25-FL654-039	A93837
	25-FL654-040	A93838
IMM F106377	25-FL654-041	A95244
IMM F122726		
IMM F116280	25-FL654-043	A96805
IMM F115528	25-FL654-044	A99639
C27-00097-002	25-FL654-042	A96522
C27-00097-003		
C27-00097-004		
C27-00097-007		
C27-00097-008		
IMM F105142	25-FL654-045	A93614