

DAIMLER

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

August 8th, 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: Defect Information Report School Bus, FL-664, Cummins Fleetguard Fuel Filter

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 153 Thomas Built Bus vehicles manufactured May 2, 2014 through July 31, 2014 equipped with Cummins ISB or ISL engines and Fleetguard coolant filter UFF-XT (part number FF63009).

Please note that this information is related to NHTSA Recall #TBD produced by Cummins, Inc Defect Information Report C1545.

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#

DAIMLER

Defect Information Report (Section 573.6)

August 8th, 2014

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

Brands: Thomas Built Bus

(c)(2) Vehicles identification:

Model(s) affected: TBB: Saf-t-liner, HDX

Model Years affected: 2015

Manufacture Dates: May 2, 2014 through July 31, 2014

Basis for determining population: Cummins ISB or ISL engine list supplied by Cummins

Component manufacturer if other than the vehicle manufacturer:

Cummins Inc.
500 Jackson Street
Columbus, IN 47201

(c)(3) Total number of vehicles potentially affected: Approximately 151 United States, 2 Export

(c)(4) Percentage of vehicles estimated to contain the defect: 25%

(c)(5) Description of the defect: See Cummins recall C1545 (attached), NHTSA recall number TBD.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: See Cummins recall C1545 (attached), NHTSA recall number TBD.

(c)(6) Chronology of principal events:

July 2014 – Cummins engine testing facility experienced a fuel filter failure, fuel filter failures identified at Daimler Trucks North America manufacturing plants and failure investigation created by Cummins. Cummins notified DTNA of initiating a voluntary campaign to remedy the condition. August 2014 - Daimler Trucks North America decided to voluntary recall affected vehicles.

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

(c)(8) (i) Remedial program: Cummins is conducting this recall. Cummins will install a new fuel filter. Repairs will be performed by Cummins authorized service facilities. Please see Cummins Defect Information Report C1545 (attached)

Reimbursement Plan: Please see Cummins Defect Information Report C1545 (attached), NHTSA Recall #TBD.

(ii) Estimated Owner and Dealer Notification Date: Cummins will notify owners and dealers. Please see Cummins Defect Information Report C1545 (attached), NHTSA Recall #TBD.

(c)(9) Information for tire recalls: Not Applicable

(c)(10) Communications sent to manufacturers, dealers and owners: Communications will be sent by Cummins. Please see Cummins Defect Information Report C1545 (attached), NHTSA Recall #TBD.

(c)(11) Manufacturer's campaign number: FL-664

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Nasser Zamani
Senior Manager
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August 8th, 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: Defect Information Report Non School Bus, FL-664, Cummins Fleetguard Fuel Filter

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 7480 Freightliner vehicles manufactured May 2, 2014 through July 31, 2014 equipped with Cummins ISB or ISL engines and Fleetguard coolant filter UFF-XT (part number FF63009).

Please note that this information is related to NHTSA Recall #TBD produced by Cummins, Inc Defect Information Report C1545.

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#

DAIMLER

Defect Information Report (Section 573.6)

August 8th, 2014

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

(c)(2) Brands: Freightliner, Western Star, FCCC
Vehicles identification:
Model(s) affected:
Freightliner: 108SD, 114SD, M2 Business Class
Western Star: 4700
FCCC: MBC,MC,MT45,MT55,S2C 106CAB,SPORT M2106,XBR,XBS,XCL,XCM,XCR,XCS
Model Years affected: 2015
Manufacture Dates: May 2, 2014 through July 31, 2014
Basis for determining population: Cummins ISB or ISL engine list supplied by Cummins
Component manufacturer if other than the vehicle manufacturer:
Cummins Inc.
500 Jackson Street
Columbus, IN 47201

(c)(3) Total number of vehicles potentially affected: Approximately 6900 United States, 580 Export

(c)(4) Percentage of vehicles estimated to contain the defect: 25%

(c)(5) Description of the defect: See Cummins recall C1545 (attached), NHTSA recall number TBD.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: See Cummins recall C1545 (attached), NHTSA recall number TBD.

(c)(6) Chronology of principal events:
July 2014 – Cummins engine testing facility experienced a fuel filter failure, fuel filter failures identified at Daimler Trucks North America manufacturing plants and failure investigation created by Cummins. Cummins notified DTNA of initiating a voluntary campaign to remedy the condition. August 2014 - Daimler Trucks North America decided to voluntary recall affected vehicles.

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

(c)(8) (i) Remedial program: Cummins is conducting this recall. Cummins will install a new fuel filter. Repairs will be performed by Cummins authorized service facilities. Please see attached Cummins Defect Information Report C1545 (attached)

Reimbursement Plan: Please see attached Cummins Defect Information Report C1545 (attached), NHTSA Recall #TBD.

(ii) Estimated Owner and Dealer Notification Date: Cummins will notify owners and dealers. Please see Cummins Defect Information Report C1545 (attached), NHTSA Recall #TBD.

(c)(9) Information for tire recalls: Not Applicable

(c)(10) Communications sent to manufacturers, dealers and owners: Communications will be sent by Cummins. Please see Cummins Defect Information Report C1545 (attached), NHTSA Recall #TBD.

(c)(11) Manufacturer's campaign number: FL-664



BY ELECTRONIC MAIL (RMD.ODI@DOT.GOV)

July 29, 2014

Nancy L. Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Dear Ms. Lewis:

Cummins Inc. has determined that certain fuel filters, as identified below, may contain a safety-related defect. The following is submitted in accordance with the National Highway Traffic Safety Administration's defect regulations, 49 CFR Part 573.6.

Product Identification and Estimated Defect Population:

This notice involves approximately 63,600 Fleetguard UFF-XT fuel filters, part number FF63009, manufactured between April 25, 2014 and June 29, 2014 and having a date code between 14115 and 14180. Approximately 42,000 of the subject fuel filters were distributed as replacement equipment through the aftermarket channel, and approximately 21,600 filters were installed on the Cummins engines identified in the table below.

Engine Plant	Engine Model	Build Date Range
CMEP	ISB	April 28, 2014 – July 9, 2014
RMEP	ISB & ISL	April 30, 2014 – July 8, 2014

Up to approximately 25% of the fuel filters are estimated to contain this defect.

It is anticipated that these population numbers will be revised lower as Cummins continues to quantify containment actions and to clarify the aftermarket channel, OEM customers and final customer location. Cummins expects to be able to provide a list of the impacted OEM's by August 8, 2014.

Description of the Defect

The bond that attaches the filter shell to the filter nut plate may fail. If this occurs, the shell may separate from the fuel filter nut plate, causing the engine to stall without prior warning and without the ability to restart the engine until the fuel filter is replaced.

Description of the Safety Risk

An unexpected engine stall with the inability to restart the engine may lead to an increased risk of a crash.

Chronology of Events

July 7, 2014: An engine at a Cummins engine plant experienced a fuel filter failure during an engine test. Cummins also received a report of a fuel filter failure at an OEM vehicle assembly plant.

July 7-22, 2014: Cummins conducted a failure investigation, including product testing, and was able to duplicate the failure in test conditions. A Product Safety Hazard Analysis was also completed. During this period, Cummins received reports of three additional failures at an OEM vehicle assembly plant and two failures in the field.

Cummins Inc.
500 Jackson Street
Columbus, IN 47201 USA
Phone: 1-812-377-5000
cummins.com

July 22, 2014: Based upon the results of the failure investigation and testing, Cummins decided to initiate this voluntary campaign to remedy the condition.

To date, no reports of injuries, fatalities, accidents, or fires related to this condition have been received.

Remedy Program

Cummins will notify its OEM and distributor customers of this recall and will work with these customers to identify and notify affected vehicle owners and aftermarket purchasers. Product remaining in customer inventory will be replaced with new (non-defective) product, and installed product will be replaced, without charge, through the Cummins service network. Cummins' campaign code for the fuel filter recall will be C1545.

Part 577 Notice Letter; Dealer Bulletins

A draft owner notification letter will be submitted to the agency for review and approval as soon as possible. Representative copies of distributor bulletins related to this recall will be provided within five business days after they are issued.

Customer/Owner Notifications

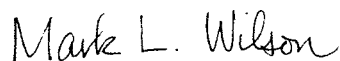
Notification of affected OEM and distributor customers is expected to occur by August 8, 2014. The timing of notification to vehicle owners and to downstream aftermarket purchasers will be determined in consultation with the affected OEMs and distributors. Owner notification will commence promptly after Cummins' receipt of the customer contact information.

Pre-Notification Remedy Reimbursement

Pursuant to 49 CFR §577.11(e), Cummins requests that it be exempt from providing notification of a reimbursement plan. Any pre-notification product failure would have been replaced under the manufacturer's limited warranty. Accordingly, no person would be eligible for reimbursement pursuant to §573.13.

Please advise the undersigned of the recall campaign number assigned by the Office of Defects Investigation to this recall.

Sincerely,



Mark L. Wilson
Director – Product Safety
Cummins Inc.

Phone: 812-377-7543
Fax: 812-377-2433
Email: mark.l.wilson@cummins.com

cc: Mr. Christopher H. Grigorian, Foley & Lardner LLP
Mr. Matthew Winings, Cummins Inc.
Ms. Kelly Schuler, NHTSA