



**Describe the safety risk:**

*In very limited circumstances – when the ignition is cycled off and then on within a few seconds – the ICU may not perform the bulb check upon startup as required by FMVSS 121 and 136. Accordingly, there is a possibility of confusing an inspector who may believe that the ABS or ESC is not functioning correctly should the ignition be cycled too quickly from on-to-off-to-on during a vehicle inspection.*

**If applicable, identify the manufacture of the defective or noncompliant component.**

*N/A*

**Chronology of Defect / Noncompliance Determination**

**Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision:**

*June 2018 DTNA Compliance became aware of a potential issue and began an extensive investigation. DTNA consulted with external lawyers for legal advice on the interpretation of the rule. July 2018 DTNA decided to initiate a voluntary recall campaign. March 2019, DTNA discovered that certain vehicles would require parts in addition to programming and updated the remedy section of this filing.*

**Identify the Remedy**

**Describe the defect/noncompliance remedy program, including the manufacture's plan for reimbursement.**

*The ICUs will be reprogrammed so that there will be a bulb check each time the key is switched to the "on" position. Also, the sub-population with Tire Pressure Monitoring (TPMS) will also require replacement parts. Repairs will be performed by Daimler Trucks North America authorized service facilities. Copies of the reimbursement plan will be submitted as a supplemental report when available.*

**Identify the Recall Schedule**

**Describe the recall schedule for notifications:**

*Customer notification will be made by first class mail using Daimler Trucks North America records to determine the customers affected.*

**Planned Dealer Notification Begin Date:** 9/17/2018

**Planned Dealer Notification End Date:** 9/17/2018

**Planned Owner Notification Begin Date:** 9/17/2018

**Planned Owner Notification End Date:** 9/17/2018

**Manufacture's identification code for this recall (if applicable):** FL-780

**DTNA Representative;**



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