

Part 573 Safety Recall Report

20V-485

Manufacturer Name : Daimler Trucks North America LLC**Submission Date :** AUG 14, 2020**NHTSA Recall No. :** 20V-485**Manufacturer Recall No. :** FL-859**Manufacturer Information :**

Manufacturer Name : Daimler Trucks North America LLC

Address : 4747 N. Channel Avenue

Portland OR 97217-3849

Company phone : 800-745-8000

Population :

Number of potentially involved : 1,715

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2018-2019 Freightliner Custom Chass XCL chassis

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style :

Power Train : NR

Descriptive Information : Vehicles equipped with certain dash instrument panel (IP) controller built between the above dates with a certain software release.

Production Dates : OCT 21, 2014 - MAY 07, 2019

VIN Range 1 : Begin : NR End : NR

 Not sequential

Vehicle 2 : 2015-2019 Freightliner Custom Chass XCM chassis

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style :

Power Train : NR

Descriptive Information : Vehicles equipped with certain dash instrument panel (IP) controller built between the above dates with a certain software release.

Production Dates : OCT 21, 2014 - MAY 07, 2019

VIN Range 1 : Begin : NR End : NR

 Not sequential

Vehicle 3 : 2018-2019 Freightliner Custom Chass XCP chassis

Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES

Body Style :

Power Train : NR

Descriptive Information : Vehicles equipped with certain dash instrument panel (IP) controller built between the above dates with a certain software release.

Production Dates : OCT 21, 2014 - MAY 07, 2019

VIN Range 1 : Begin : NR End : NR

 Not sequential

Vehicle 4 : 2018-2019 Freightliner Custom Chass XCR chassis
Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES
Body Style :
Power Train : NR

Descriptive Information : Vehicles equipped with certain dash instrument panel (IP) controller built between the above dates with a certain software release.

Production Dates : OCT 21, 2014 - MAY 07, 2019

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 5 : 2018-2019 Freightliner Custom Chass XCS chassis
Vehicle Type : BUSES, MEDIUM & HEAVY VEHICLES
Body Style :
Power Train : NR

Descriptive Information : Vehicles equipped with certain dash instrument panel (IP) controller built between the above dates with a certain software release.

Production Dates : OCT 21, 2014 - MAY 07, 2019

VIN Range 1 : Begin : NR End : NR Not sequential

Description of Noncompliance :

Description of the Noncompliance : On the affected vehicles, the illumination of the IP may not meet the requirements of FMVSS 101 which states:
S5.3.2 Brightness of illumination of controls and indicators
(b) At a level of brightness other than the highest level, the identification of controls and indicators must be barely discernible to the driver who has adapted to dark ambient roadway condition;

FMVSS 1 : 101 - Control and displays

FMVSS 2 : NR

Description of the Safety Risk : A display that does not dim to a level barely discernable as required in FMVSS 101, may create glare, that could reduce certain drivers visibility of the road, thus increasing the risk of a crash.

Description of the Cause : NR

Identification of Any Warning that can Occur : NA

Involved Components :

Component Name 1 : Instrument Cluster Module (ICU)

Component Description : IP Controller

Component Part Number : 66-15475-000

Component Name 2 : Instrument Cluster Module (ICU)

Component Description : IP Controller

Component Part Number : 66-15475-001

Component Name 3 : Instrument Cluster Module (ICU)

Component Description : IP Controller

Component Part Number : 66-15475-002

Component Name 4 : Instrument Cluster Module (ICU)

Component Description : IP Controller

Component Part Number : 66-15475-003

Supplier Identification :

Component Manufacturer

Name : NR

Address : NR

NR

Country : NR

Chronology :

In December 2018, DTNA was made aware of 6 reports from the field, indicating potential customer concern regarding instrument panel (IP) brightness. DTNA reviewed these reports and evaluated the issue, including potential non-compliance with FMVSS 101. Following that evaluation, in January 2019, DTNA reasonably determined, in good faith, that the IPs complied with FMVSS 101 and did not otherwise present a safety concern under applicable law. In June 2019, DTNA released a product improvement into production, allowing further dimming beyond that in existing IPs. At that time, DTNA reasonably affirmed its prior good faith analysis that the IPs complied with FMVSS 101 and did not otherwise present a safety concern. May 2020, NHTSA requested additional information following more recent VOQ reports. DTNA promptly

responded, and cooperated with the agency between May and July 2020. During this time, DTNA explained its analysis of the issue, and the grounds for its analysis that the IPs complied with FMVSS 101 and did not otherwise present a safety concern. Appreciating customer and agency concerns, in mid-July 2020, DTNA proposed to a field software update as a field service campaign to address customer concerns. Shortly thereafter, DTNA further discussed this issue with the agency. Following all these discussions between DTNA and NHTSA, on August 10, 2020, NHTSA's Office of Vehicle Safety Compliance (OVSC) expressed its view to DTNA, in writing, of its interpretation that the adjustment increments for the IP brightness did not comply with FMVSS 101, 49 CFR 571.101, S5.3.2.2(b), and requested a non-compliance report under 49 CFR Part 573. While DTNA has consistently, and in good faith, reasonably determined compliance under FMVSS 101, including S5.3.2.2(b) of the standard, with great respect for NHTSA and the process, DTNA agreed to the agency's request, and decided to conduct a voluntary recall on August 14, 2020.

Description of Remedy :

Description of Remedy Program : Vehicles will inspected for software versions, and based on the software version vehicles will receive a software update in some cases the vehicle will receive a processor and software update. Repairs will be performed by Daimler Trucks North America authorized service facilities. Details of the reimbursement plan will be included in the owner's notification letter.

How Remedy Component Differs from Recalled Component : NR

Identify How/When Recall Condition was Corrected in Production : NR

Recall Schedule :

Description of Recall Schedule : Customer notification will be made by first class mail using Daimler Trucks North America records to determine the customers affected.

Planned Dealer Notification Date : OCT 12, 2020 - OCT 12, 2020

Planned Owner Notification Date : OCT 12, 2020 - OCT 12, 2020

* NR - Not Reported