

Defect Information Report

(Section 573.6)

FL-848

Date of Submission: *April 14, 2020*

Manufacturer: Daimler Trucks North America LLC
P.O. BOX 3849
Portland, Oregon 97208

Type of Report: Safety Defect Non-Compliance

Vehicle Information

Model Yr. Start: 2006 Model Yr. End: 2021

Make: *Freightliner, Western Star, Sterling*

Model: *Century Class, Columbia, Business Class M2, Classic, FLD, Argosy, Coronado, Cascadia, 122SD, 5700, A9500, AT9500*

Production Dates: Begin: *04/14/2005*
End: *03/27/2020*

Descriptive Information:

On certain vehicles, the rear retroreflective sheeting is partially covered by the mudflap hanger bracket (more than 38 mm of the required 50 mm remain visible).

Number potentially involved: 63,175 Estimated percentage of involve with defect: 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

On the affected vehicles, the rear retroreflective sheeting may be partially covered by the mudflap hanger bracket (more than 38 mm of the required 50 mm remain visible). Tractors as defined in FMVSS 108; Lamps, Reflective devices and associated equipment require retroreflective sheeting width of 50mm for grade DOT-C2 material, and as such these vehicles may not meet the requirements. DTNA has no indication of accidents or any other problems as a result of this noncompliance.

If a noncompliance, provide the applicable FMVSS:

FMVSS 108

Describe the safety risk:

A noncompliance with conspicuity tape requirements of FMVSS 108 may cause the vehicle's visibility to other drivers to be reduced, increasing the risk of a crash

Chronology of Defect / Noncompliance Determination

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

February 2020, DTNA received a notification of a vehicle failing DOT inspection due to partially covered conspicuity tape. DTNA opened an investigation to determine the root cause and to identify potential field exposure. March 2020, Investigation revealed that the work instructions did not specify correct installation of the reflector bracket, and identified that it was therefore possible to assemble the bracket in such a way that it could partially obscure the reflective tape. Further investigation was conducted to identify affected manufacturing facilities and population of affected vehicles. April 6, 2020, DTNA decided to conduct a voluntary non-compliance recall on the vehicles equipped with certain mudflap hanger brackets.

Identify the Remedy

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

The reflective tape will be inspected to ensure that it is completely visible and moved if required. 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

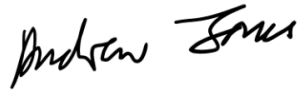
Describe the recall schedule for notifications.:

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:	<i>06/12/2020</i>
Planned Dealer Notification End Date:	<i>06/12/2020</i>
Planned Owner Notification Begin Date:	<i>06/12/2020</i>
Planned Owner Notification End Date:	<i>06/12/2020</i>

Manufacturer's identification code for this recall (if applicable): *FL-848*

DTNA Representative;

A handwritten signature in black ink that reads "Andy Jones". The signature is written in a cursive, slightly slanted style.

Andy Jones
Manager
Compliance and Regulatory Affairs