

Amended Defect Information Report

(Section 573.6)

FL-857

Date of Submission: *November 9, 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: *2021* **Model Yr. End:** *2022*

Make: *Thomas Built Buses*

Model: *Saf-T-Liner C2*

Production Dates: **Begin:** *11/1/2019* **End:** *10/29/2020*

Descriptive Information:

Saf-T-Liner C2 School Buses equipped with specific adjustable pedals supplied by Kongsberg Automotive.

Number potentially involved: *1713* **Estimated percentage of involve with defect:** *100%*

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

In rare cases, the adjustable brake pedal arm may rotate or bend away from its original location.

Describe the safety risk:

Rotation or bending of the brake pedal may lead to an out of position brake pedal, which the driver may not be able to locate accurately during a required braking event, thus increasing the risk of a crash.

If applicable, identify the manufacture of the defective or noncompliant component:

Kongsberg Automotive

Involved Components

Component Name: Adjustable Brake Pedal

Component Description: PEDAL-BRAKE,PNEUMATIC,ADJ

Component Part Number: A12-24318-000

Component Name: Adjustable Brake Pedal

Component Description: PEDAL-BRAKE,HYDRAULIC,ADJ

Component Part Number: A12-24317-000

Chronology of Defect / Noncompliance Determination

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

May 2020, 3 brake pedal assemblies were found to rotate at the school bus body manufacturing plant during a brake pedal test and DTNA notified the supplier. DTNA began a review of brake pedals while at the same time ensuring all pedals were oriented correctly before delivery to customers. June 2020, the supplier requested vehicles placed on hold for a brake pedal assembly replacement and conducted further investigation. Late June 2020, Supplier recommended DTNA to replace suspect brake pedal assemblies for the field, but did not indicate if the issue was related to safety. July 2020, DTNA completed a review of the suspect population in the field, warranty, and field reports, and investigated to determine the risk to vehicle safety. July 22, 2020, after conclusion of the in-depth investigation, DTNA, with an abundance of caution, decided to initiate a voluntary recall to campaign vehicles with the suspected brake pedal assembly. September 25, 2020 DTNA notified owners of an interim recall notice for campaign FL-857. September 2020 the supplier discovered deformation of the tube assembly during a validation test on another component requested vehicles to be placed on hold for further analysis. The analysis indicated slight deformation in the tube during load testing. DTNA began reviewing warranty and field complaints. The review indicated no reported failures in the field. Late October 2020, the supplier provided a recommendation to replace all brake pedal assemblies. November 3, 2020 DTNA, with an abundance of caution, decided to expand FL-857 to campaign vehicles with the suspected brake pedal assembly.

Identify the Remedy

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

School bus chassis will receive a new brake pedal assembly. 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.

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: 1/7/2021

Planned Dealer Notification End Date: 1/7/2021

Planned Owner Notification Begin Date: 1/7/2021

Planned Owner Notification End Date: 1/7/2021

Manufacture's identification code for this recall (if applicable): FL-857

DTNA Representative:



Larissa Stoffels
Executive Manager, Vehicle Safety
Compliance and Regulatory Affairs