

## Defect Information Report

(Section 573.6)

**FL-877**

**Date of Submission:** February 24, 2021

**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:** Freightliner Custom Chassis

**Model:** XC Chassis

**Production Dates:**    **Begin:** 06/18/2020              **End:** 10/09/2020

**Descriptive Information:** Certain motorhome chassis equipped with an adjustable brake pedal assembly built within the identified manufacturing dates.

**Number potentially involved:** 276    **Estimated percentage of involve with defect:** 28%

### Defect / Noncompliance Description

#### For this Defect/Noncompliance:

#### Describe the defect or noncompliance:

Certain motorhome chassis equipped with an adjustable brake pedal assembly may not be equipped with a return spring. In some situations, the brake pedal may not promptly return to the return position leaving the brake signal activated and brake lights to stay illuminated. Additionally, in certain towed vehicles, the service brakes may also stay engaged.

#### If a noncompliance, provide the applicable FMVSS:

108 - Lamps, reflective devices, and associated equipment.

**Describe the safety risk:**

A non-compliance with FVMSS 108 S7.3.5 and table I-A of stop lamp illumination after service brake release may prevent accurate communication to following vehicles of intent of slowing the vehicle down. If the brakes lights stay illuminated after the brake pedal is released, an additional service brake application will not cause the brake lights to illuminate and would not signal to other motorists the intent of the driver to slow the vehicle, potentially leading to an increased risk of a crash. In addition, if the brake activation signal to a towed device remains active when the motorhome chassis service brakes are released, the brakes on a towed device may potentially remain engaged depending on brake configuration of the trailer. A towed device with incorrectly operating brakes could increase the risk of a crash.

**Identify any warning which can precede or occur:**

Brake lights may be illuminated during pre-trip inspections and inability to set cruise after brake pedal is released.

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

Williams Control

**Involved Components**

**Component Name:** Brake pedal return spring

**Component Description:** SPRING-TORSION,RETURN

**Component Part Number:** 12-27994-000

**Chronology of Defect / Noncompliance Determination****Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:**

October 2020, a body builder notified DTNA of brake lights remaining illuminated after the service brake pedal was released on an XC motorhome chassis. Under further inspection, the reported vehicle identified a missing return spring in the pedal assembly. Also in October 2020, DTNA opened an investigation to identify the scope of the issue, involving a population, warranty, and field report review along with a manufacturing audit and a request for inspections at the chassis plant and body builder locations. October 2020 – February 2021, the review and audit indicated that the part had a shortage in manufacturing but that there were 0 additional reports in the field. An inspection of vehicles located at the chassis plant and body builder location identified 23 chassis with missing spring returns out of 81 inspected. The initial population identified indicated 0 vehicles sold to the end user, such that DTNA based upon available evidence reasonably believed the issue to be contained to vehicles prior to delivery to customers. In February 2021, based on inspection data and an updated suspect vehicle list indicating vehicles with end users, DTNA with an abundance of caution decided to initiate a voluntary recall campaign to address the potential missing return spring on the brake pedal assembly in the field.

## Identify the Remedy

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

DTNA will inspect the affected assemblies and install a return spring as needed. 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.*

<b>Planned Dealer Notification Begin Date:</b>	04/24/2021
<b>Planned Dealer Notification End Date:</b>	04/24/2021
<b>Planned Owner Notification Begin Date:</b>	04/24/2021
<b>Planned Owner Notification End Date:</b>	04/24/2021

**Manufacture's identification code for this recall (if applicable):** FL-877

**DTNA Representative;**



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Compliance and Regulatory Affairs