Defect Information Report

(Section 573.6)

FL-927

Date of Submission: April 20, 2022

Manufacturer: Daimler Truck North America LLC

P.O. BOX 3849

Portland, Oregon 97208

Type of Report: X Safety Defect Non-Compliance

Vehicle Information

Model Yr. Start: 2022 Model Yr. End: 2022

Make: Western Star Model: 4700, 4900

Production Dates: Begin: 03/19/2022 End: 08/04/2022

Type: Truck/Tractor

Descriptive Information: Three vehicles built at Portland Manufacturing Plant within the above manufacturing date range underwent a process to manually tighten seat belt tether bolts that was outside of DTNA's standard manufacturing process and may not have been properly installed prior to delivery. Out of an abundance of caution, DTNA will recall the vehicles to check the seat belt tether bolt installation.

Number potentially involved: 3 Estimated percentage of involve with defect: 33%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

Improperly installed seat belt tether bolts that may detach under load. At the present time, DTNA has no evidence of a noncompliance on the subject vehicles; however, DTNA will continue in good faith to investigate.

If a noncompliance, provide the applicable FMVSS: N/A

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Describe the safety risk:

Improperly installed seat belt tether bolts may detach under loading and may not adequately restrain an occupant in a crash, increasing the risk of injury.

Identify any warning, which can precede or occur: In DTNA's Western Star 4700 and 4900 driver's manuals, the Daily Pre-trip Inspections and Maintenance section calls out for inspecting and maintaining seat belts and tether bolts, including tightening any that are loose. Additionally, improperly installed tether bolts may be visually detectable in certain scenarios.

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

Involved Components

Component Name: Seat Belt Tether Bolts **Component Description:** Restraint System

Component Part Number: IMM F151093, IMM F151086, IMM F105383, IMM F151092, IMM

F105384

Supplier Identification:

Component Manufacturer:

Name: Indiana Mills & Manufacturing, Inc. (IMMI) Blvd. Cesar H. Cantu No. 176

Saltillo

Country: Mexico

Chronology of Defect / Noncompliance Determination

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

In October 2021, DTNA's Compliance Department was notified by Portland Truck Manufacturing Plant (PTMP) regarding a potential manufacturing quality issue involving a seat belt tether bolt on a single foreign-domiciled unit. In early November, 2021, as soon as DTNA had sufficient information from its preliminary investigation, and after reasonably assessing the given situation involving one early life case of a visually detected loose seat belt tether bolt, DTNA opened a defect investigation case to further monitor the issue.

The suspect population for monitoring was identified as a small population of vehicles given a particular set of rework outside normal manufacturing. At the offline station, these vehicles were signed off as repaired; however, one foreign domiciled unit that underwent that repair process was found to not have the documented issue fixed. Based on this finding, DTNA

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promptly identified other units built starting from the same period as the unit with the issue that were documented to have undergone a similar rework process. All suspect vehicles were documented to have the seat belt bolts installed properly, in compliance with relevant Federal Motor Vehicle Safety Standards and internal DTNA specifications. Nonetheless, out of an abundance of caution, DTNA promptly investigated the issue and notified the US National Highway Traffic Safety Administration of this investigation between November 2021 to late March 2022; in that investigation DTNA continued to monitor warranty claims, manufacturing data, and field communications for any indication of loose seat belt tether bolts or related issues. Moreover, DTNA inquired with vehicle owners for data on the seat belt tether bolts. At no time did DTNA determine, nor should it have determined, that there was a recallable defect. However, DTNA continued to monitor the issue. On March 29, 2022, DTNA received a second notification (warranty claim) on a unit identified within the scope of the suspect population that was unclear on whether or not there was a presence of defect. Early April 2022, DTNA performed an additional warranty and report seek, and found no additional claims or reports involving seat belt tether bolts on the suspect population. On April 14, 2022, out of abundance of caution, DTNA decided to conduct a voluntary safety recall on three Western Star vehicles built within the above mentioned manufacturing date range manufactured at PTMP that underwent the aforementioned seat belt tether bolt rework process. In the process of checking and remedying vehicles, DTNA will determine if evidence suggests that in fact any vehicles were noncompliant with an FMVSS.

Identify the Remedy

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

Suspect units will be inspected for proper attachment and torque of seat belt tether bolts. Repairs will be performed by Daimler Truck North America authorized service facilities. Daimler Truck North America shall be offering a refund for owner-paid repairs covered by this recall if the repair was performed prior to the date indicated in the reimbursement plan, which will be posted with owner's notification letter. Owners are directed to seek reimbursement through authorized dealers.

Identify the Recall Schedule

Describe the recall schedule for notifications:

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

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Planned Dealer Notification Begin Date:	06/18/2022
Planned Dealer Notification End Date:	06/18/2022
Planned Owner Notification Begin Date:	06/18/2022
Planned Owner Notification End Date:	06/18/2022

Manufacture's identification code for this recall (if applicable): FL-927

DTNA Representative; Tiffani Torgeson

Tiffani Torgeson Manager, Compliance and Regulatory Affairs