

On or about mid-2017, DTNA's seat supplier informed DTNA of a fractured S3C seat frame. DTNA reviewed the matter, concluded it did not present a safety-related concern, and documented the matter. Beginning in or about September 2018, DTNA received several reports of fractured from one customer location and as part of a newly formed process briefed NHTSA on the topic. Thereafter, DTNA began an investigation, which included field inspection and engineering laboratory and field tests. Upon reoccurring review with NHTSA, DTNA concluded that the matter did not present a safety-related concern, and again documented the matter but also monitored the situation. During this period of monitoring, in or about late 2019, DTNA concluded that the issue, if it manifested, was limited to very small numbers of seats concentrated in a specific geographic location. A root cause such as uniquely severe road use/environmental use cases was conjectured but not fully understood, given the limited information then available. That said, DTNA again reaffirmed its prior analysis that the matter did not present an unreasonable risk to safety within the meaning of the Safety Act.

In or about March 2022, DTNA received a report from a customer with buses containing cracked seat wall mount brackets. DTNA began an extensive investigation to reassess its prior analysis. Among other things, TBB conducted an on-site customer visit to assess the alleged condition, inspected field units, and analyzed the resultant fleet inspection information. In April 2022, DTNA analyzed its preliminary investigation findings, and ordered additional steps, including further field data assessment given that the issue preliminarily appeared to arise in only certain geographic areas with certain fleets with vehicles that may have been subjected to more severe road use/environmental use cases. In or about March 2022, DTNA received a report from a customer with buses containing cracked seat wall mount brackets. DTNA began an extensive investigation to reassess its prior analysis. Among other things, TBB conducted an on-site customer visit to assess the alleged condition, inspected field units, and analyzed the resultant fleet inspection information. In April 2022, DTNA analyzed its preliminary investigation findings, and ordered additional steps, including further field data assessment given that the issue preliminarily appeared to arise in only certain geographic areas with certain fleets with vehicles that may have been subjected to more severe road use/environmental use cases. On July 12 2022, DTNA determined that a safety-related defect exists in HDX and EFX Thomas Built Buses equipped with 39-inch S3C seat frames and with 3-point flex seatbelt. The relevant warranty claims, field or service reports are summarized above as required by 49 C.F.R. 573.6(c)(6). The seat frames and seatbelts otherwise conform to all applicable Federal Motor Vehicle Safety Standards. In early August 2022, while continuing to investigate this issue, DTNA discovered an accounting error whereby some potential vehicle groups were counted multiple times, resulting in an inflated suspect population. The suspect population has been corrected with this filing.

Beginning in October 2023, DTNA began to finalize the recall remedy and prepare to issue final owner notification letters to vehicle owners. As part of that process, DTNA reviewed vehicle registration data and identified that 2 vehicles that were initially included in the original population data are registered outside the United States. On October 31, 2023, DTNA adjusted the population to reflect this updated data as well as to update the description of the remedy, and owner and dealer notification schedule. DTNA also updated the listing of the affected vehicle models to more closely align with the manufacturer naming convention.