

Defect / Noncompliance Information Report

(Section 573.6)

FL946

Date of Submission: 7/19/2022

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

Type of Report: Safety Defect Non-Compliance

Vehicle Information

Model Yr. Start: 2014 Model Yr. End: 2022

Make: Thomas Built Buses

Model: HDX and EFX

Production Dates: Begin: 5/24/2013 End: 10/22/2021

Descriptive Information: The subject population includes approximately 4,242 Model Year 2014-2022 Thomas Built Bus ("TBB") HDX and EFX vehicles produced within the above-specified production date range in the United States.

Basis for Determination of the Recall Population: Under certain extreme operating conditions, that may include adverse road conditions, a metal fatigue-related cracking may develop on 39 inch S3C seat frames with a 3-point flex belt seat rear wall mount bracket. Over time, if the condition manifests itself, the crack may propagate and lead to fracturing of the wall mount bracket.

Number potentially involved: 4344

Estimated percentage of involved with defect: 1%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

The subject vehicles are equipped with specific passenger seats that may experience abnormal structural fatigue that may impact seat strength during a crash. Root cause has not yet been determined.

Describe the safety risk:

Fatigue of the seats frame structure could result in frame cracking, thus causing the seat to shift and rotate. The seat may therefore not provide adequate restraint to a belted passenger, which may increase the risk of injury to vehicle occupants in a crash.

Description of the Cause: TBB continues to investigate root cause.

Identify any warning which can precede or occur:

_ A fractured seat frame mounting bracket may be noticed during daily walk through, cleaning, bus inspections and routine maintenance.

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

Involved Components

Component Name: ___ Passenger Seat Frame _____

Component Description: ___ Seat Lower Frame _____

Component Part Number: ___ 30628, 30630 _____

NOTE: *If a Component that contains the defect or noncompliance was manufactured by a different manufacturer from the reporting manufacturer, list the following:*

Component's country of origin: ___ US _____

Business address: ___ Thomas Built Buses, Inc., 1408 Courtesy Road, High Point, NC 27260 _____

Business telephone number: ___ 336 889 4871 _____

If the reporting manufacturer does not know the identity of the manufacturer of the component, it shall identify the entity from which it was obtained. If at the time of submission of the initial report, the

reporting manufacturer does not know the country of origin of the component, the manufacturer shall ascertain the country of origin and submit a supplemental report with that information once it becomes available.

Chronology of Defect / Noncompliance Determination

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

In 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 May 2022 through late June 2022, DTNA conducted the ordered field study and analysis. DTNA's field analysis yielded the following: TBB team inspected 13037 seats and identified 8 of the inspected seats with fractured mounting bracket. 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.

Identify the Remedy

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

__The remedy is to be determined at this time

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: _9/16/2022_

Planned Dealer Notification End Date: _9/16/2022_

Planned Owner Notification Begin Date: _9/16/2022_

Planned Owner Notification End Date: _9/16/2022_

Does DTNA plan to file inconsequentiality petition? Yes No

Manufacturer's identification code for this recall (if applicable): _ **FL946** _____

DTNA Representative;

Sam Geser

Sam Canupp
Manager, Compliance and Regulatory Affairs