

Defect / Noncompliance Information Report

(Section 573.6)

FL957

Date of Submission: 10/12/2022

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: 2011 **Model Yr. End:** 2023

Make: Thomas Built Buses

Model: Thomas Saf-T-Liner HDX and Thomas Saf-T-Liner EFX

Production Dates: **Begin:** 03/01/2010 **End:** 08/01/2022

Descriptive Information:

On certain Thomas Built Buses Saf-T-Liner HDX and Saf-T-Liner EFX school buses the adhesive may not have been properly applied in between the steel panels that forms the roof sheet lap joints. If the adhesive is improperly applied, the joint may not meet the joint strength requirement of FMVSS 221 S5.1.

Basis for Determination of the Recall Population:

Thomas Built Buses Saf-T-Liner HDX and EFX school buses built with certain roof lap joint configurations and manufactured in the production range listed above.

Number potentially involved: 17613

Estimated percentage of involved with defect: 80%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

On certain Thomas Built Buses Saf-T-Liner HDX and EFX school buses, the roof exterior joint with improperly applied adhesive was found to not meet the joint strength requirement of FMVSS 221 S5.1.

Describe the safety risk:

A body Joint on a school bus that does not meet the joint strength requirement of FMVSS 221 S5.1 may increase the risk of injury in the event of a crash.

Identify any warning which can precede or occur: NA**If applicable, identify the manufacture of the defective or noncompliant component.:**

There are no defective or noncompliant components on the affected school buses. This issue is related only to assembly of the joint components on the affected school buses.

Involved Components

Component Name: Roof Sheet panel

Component Description: Roof Sheet panel

Component Part Number: 140599, 56000857, 56000896, and 56001211

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

In 2010, Thomas Built Buses (TBB) established a new procedure for the exterior roof sheet lap joint adhesion validated to FMVSS 221 requirements through good engineering judgment and analysis. In 2011, TBB validated the roof sheet joint, performing physical testing against FMVSS requirements, and found that the joints passed with considerable margin. From that time until recently, TBB continued to produce the same design, with the same manufacturing process, and therefore had no reason to believe the joint did not comply with the standards. On September 1, 2022 NHTSA Office of Vehicle Safety Compliance notified TBB that a sample, taken from a Saf-T-Liner HDX school bus that the agency had purchased, failed the FMVSS 221 joint strength test for the exterior roof lap joint. Immediately, on September 2, 2022, based on the testing information provided by NHTSA, TBB began an investigation to evaluate the potential noncompliance, determine the scope, and establish the potentially affected population. September 9, 2022 TBB requested a visit to NHTSA's test facility to review findings and the test equipment and procedures. On September 22, 2022, TBB visited Applus IDIADA Karco Engineering. In late September, 2022 TBB reviewed data from that visit and conducted additional engineering verification testing that suggested previously-unexpected manufacturing variability in joint strength. On October 6, 2022, TBB promptly decided to initiate a voluntary noncompliance recall for certain Thomas Built Buses HDX and EFX school buses that may be built with roof exterior roof sheet lap joints with improperly applied adhesive, which subsequently may not meet the joint strength requirement of FMVSS 221 S5.1. TBB has received no warranty claims, no field reports, no customer complaints, no information of injury nor fatality, nor any other indication of a noncompliance until NHTSA's September 2022 notification.

Identify the Remedy

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

Additional mechanical fasteners will be added to the joints on affected vehicles in order to bring the vehicles into compliance. The repair will be conducted by a 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 Trucks North America records to determine the customers affected.

Planned Dealer Notification Begin Date:	12/10/2022
Planned Dealer Notification End Date:	12/10/2022
Planned Owner Notification Begin Date:	12/10/2022
Planned Owner Notification End Date:	12/10/2022

Does DTNA plan to file inconsequentiality petition? Yes No

Manufacturer's identification code for this recall (if applicable): FL957

DTNA Representative;

Sam Geser

Sam Geser
Manager, Compliance and Regulatory Affairs