

August 2024
FL918 AB
NHTSA School Bus #24V-555
Transport Canada School Bus #2024-423

Subject: TBB Emergency Exit Label

Models Affected: Specific model years 2019-2022 Thomas Built Bus Saf-T-Liner C2, Saf-T-Liner C2 Jouley, Saf-T-Liner EFX and HDX, and Minotour DRW, and SRW buses manufactured January 22, 2018, through March 11, 2021.

General Information

Daimler Truck North America LLC (DTNA), on behalf of its wholly owned subsidiary, Thomas Built Bus, has decided that a non-compliance that relates to motor vehicle safety exists on the vehicles mentioned above.

The letter height on the labels for the school bus emergency exits is less than the 5 cm required by Federal Motor Vehicle Safety Standard 217, "Bus emergency exits and window retention and release". A non-compliance with the lettering height requirement may delay the reaction time for certain people to identify the emergency exit, increasing the risk of injury in the event of a crash.

The letter height will be increased to the required 5 cm per the Federal Motor Vehicle Safety Standard 217.

There are approximately 28,876 vehicles involved in this campaign.

Additional Repairs

Dealers must complete all outstanding recall and field service campaigns prior to the sale or delivery of a vehicle. A dealer will be liable for any progressive damage that results from its failure to complete campaigns before sale or delivery of a vehicle.

Owners may be liable for any progressive damage that results from failure to complete campaigns within a reasonable time after receiving notification.

Work Instructions

Please refer to the attached work instructions. .

Replacement Parts

A fine tip oil based paint pen is required and considered a "shop supply" or equivalent.

If our records show your dealership has ordered any vehicle(s) involved in campaign number FL918, a list of the customers and vehicle identification numbers will be available on the DTNA Portal via OWL. Please refer to this list when ordering parts for this recall.

Table 1 - Replacement Parts for FL918

Campaign Number	Part Description	Part Number	Qty.
FL918 AB	FINE TIP OIL BASED PAINT PEN - RED	SHOP SUPPLY OR EQUIVALENT	1 ea
	FINE TIP OIL BASED PAINT PEN - BLACK		
	BLANK COMPLETION STICKER	WAR260	1 ea

Table 1

Removed Parts

U.S. and Canadian Dealers, please follow Warranty Failed Parts Tracking shipping instructions for the disposition of all removed parts. Export distributors, please destroy removed parts unless otherwise advised.

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Labor Allowance

Table 2 - Labor Allowance

Campaign Number	Procedure	Time Allowed (hours)	SRT Code	Corrective Action
FL918 AB	Repair 1-2 emergency exit labels	0.1	996-R241A	12-Repair Recall/Campaign
	Repair 3-8 emergency exit labels	0.2	996-R241B	12-Repair Recall/Campaign

Table 2

Claims for Credit

You will be reimbursed for your parts, labor, and handling (landed cost for Export Distributors) by submitting your claim through the warranty system within 30 days of completing this campaign. Please reference the following information in OWL:

- Claim type is **Recall Campaign**.
- In the Campaign field, enter the campaign number and appropriate condition code (**FL918-A or FL918-B**).
- In the Primary Failed Part Number field, enter **25-FL918-000**.
- In the Parts field, enter the appropriate part number as shown in the Replacement Parts table.
- The VMRS Component Code is **F99-999-005** and the Cause Code is **A1 - Campaign**.
- **U.S. and Canada -- Reimbursement for Prior Repairs.** When a customer asks about reimbursement, please do the following:
 - Accept the documentation of the previous repair.
 - Make a brief check of the customer's paperwork to see if the repair may be eligible for reimbursement. (See the "Copy of Owner Letter" section of this bulletin for reimbursement guidelines.)
 - Submit an OWL Recall Pre-Approval request for a decision.
 - Include the approved amount on your claim in the Other Charges section.
 - Attach the documentation to the pre-approval request.
 - If approved, submit a based-on claim for the pre-approval.
 - Reimburse the customer the appropriate amount.

IMPORTANT: OWL must be viewed prior to performing the recall to ensure the vehicle is involved and the campaign has not been previously completed.

U.S. and Canadian dealers, if you need additional information, contact the Warranty Campaigns Department using the WSC (Warranty Support Center) app on the DTNA Portal. Export distributors, submit a WSC ticket or contact your International Service Manager.

U.S. and Canadian Dealers: To return excess kit inventory related to this campaign, U.S. dealers must submit a Parts Authorization Return (PAR) to the Memphis PDC. Canadian dealers must submit a PAR to their facing PDC. All kits must be in resalable condition. PAR requests must include the original purchase invoice number. Export Distributors: Excess inventory is not returnable.

The letter notifying U.S. and Canadian vehicle owners is included for your reference.

Please note that the National Traffic and Motor Vehicle Safety Act, as amended (Title 49, United States Code, Chapter 301), requires the owner's vehicle(s) be corrected within a reasonable time after parts are available to you. The Act states that failure to repair a vehicle within 60 days after tender for repair shall be prima facie evidence of an unreasonable time. However, circumstances of a particular situation may reduce the 60 day period. Failure to repair a vehicle within a reasonable time can result in either the obligation to (a) replace the

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vehicle with an identical or reasonably equivalent vehicle, without charge, or (b) refund the purchase price in full, less a reasonable allowance for depreciation. The Act further prohibits dealers from selling a vehicle unless all outstanding recalls are performed. Any lessor is required to send a copy of the recall notification to the lessee within 10 days. Any subsequent stage manufacturer is required to forward this notice to its distributors and retail outlets within five working days.

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Copy of Notice to Owners

Subject: TBB Emergency Exit Labels

For the Notice to U.S. Customers: This notice is sent to you in accordance with the National Traffic and Motor Vehicle Safety Act. **For the Notice to Canadian Customers:** This notice is sent to you in accordance with the requirements of the Motor Vehicle Safety Act. This is to inform you that your vehicle may be non-compliant that could affect the safety of a person.

Daimler Truck North America LLC (DTNA), on behalf of its wholly owned subsidiary, Thomas Built Bus, has decided that a non-compliance that relates to motor vehicle safety exists on specific model years 2019-2022 Thomas Built Bus Saf-T-Liner C2, Saf-T-Liner C2 Jouley, Saf-T-Liner EFX and HDX, and Minotour DRW, and SRW buses manufactured January 22, 2018, through March 11, 2021.

The letter height on the labels for the school bus emergency exits is too small and may be difficult to read, which can prevent or delay emergency exit use, increasing the risk of injury in the event of a crash.

The letter height will be increased to the required 5 cm per the Federal Motor Vehicle Safety Standard 217. Repairs will be performed by Daimler Truck North America authorized service facilities.

Please contact an authorized Daimler Truck North America dealer to arrange to have the recall performed and to ensure that parts are available at the dealership. The recall will take approximately one half hour and will be performed free of charge. To locate an authorized dealer, search online at <https://northamerica.daimlertruck.com/contact-us/>. Scroll down to "Locate a Dealer," and select the appropriate brand. You may also confirm your vehicle's involvement in this recall at this URL: <https://dtna-dlrinfo.prd.freightliner.com:48518/VinLookup/vin-module/getVinLookupPage>.

You may be liable for any progressive damage that results from your failure to complete the recall within a reasonable time after receiving notification.

If you do not own the vehicle that corresponds to the identification number(s) which appears on the recall notification, please return the notification to the Warranty Campaigns Department in the postage-paid envelope with any information you can furnish that will assist us in locating the present owner. If you have leased this vehicle, federal law requires that you forward this notice to the lessee within 10 days. If you are a subsequent stage manufacturer, federal law requires that you forward this notice to your distributors and retail outlets within five working days. If you have paid to have this recall condition corrected prior to this notice, you may be eligible to receive reimbursement. Please see the reverse side of this notice for details.

If you have questions about this recall, please contact the Warranty Campaigns Department at (800) 547-0712, 7:00 a.m. to 4:00 p.m. Pacific Time, Monday through Friday, e-mail address dtna.warranty.campaigns@daimlertruck.com. **For the Notice to U.S. Customers:** If you are not able to have the defect remedied without charge and within a reasonable time, you may wish to submit a complaint to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, SE., Washington, DC 20590; or call the Vehicle Safety Hotline at (888) 327-4236 (TTY: 800-424-9153); or go to <http://www.nhtsa.gov>. **For the Notice to Canadian Customers:** If you wish to submit a complaint about this recall, you can contact Transport Canada - Road Safety, 80 Rue Noel, Gatineau, Quebec J8Z 0A1, or call (800) 333-0510.

We regret any inconvenience this action may cause but feel certain you understand our interest in motor vehicle safety.

WARRANTY CAMPAIGNS DEPARTMENT

Enclosure

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Reimbursement to Customers for Repairs Performed Prior to Recall

If you have already **paid** to have this recall condition corrected you may be eligible to receive reimbursement.

Requests for reimbursement may include parts and labor. Reimbursement may be limited to the amount the repair would have cost if completed by an authorized Daimler Truck North America LLC dealer. The following documentation must be presented to your dealer for consideration for reimbursement.

Please provide original or clear copies of all receipts, invoices, and repair orders that show:

- The name and address of the person who paid for the repair
- The Vehicle Identification Number (VIN) of the vehicle that was repaired
- What problem occurred, what repair was done, when the repair was done
- Who repaired the vehicle
- The total cost of the repair expense that is being claimed
- Proof of payment for the repair (such as the front and back of a cancelled check or a credit card receipt)

Reimbursement will be made by check from your Daimler Truck North America LLC dealer.

Please speak with your Daimler Truck North America LLC authorized dealer concerning this matter.

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Work Instructions

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Correcting the Labels on the Emergency Door and Window

1. Park the vehicle on a level surface, shut down the engine, and set the parking brake. Chock the tires.
2. Locate the emergency window and emergency door labels on the vehicle, as shown in [Figure 1](#). [Figure 2](#) shows the examples of the labels.



Fig. 1, Emergency Door and Window Labels

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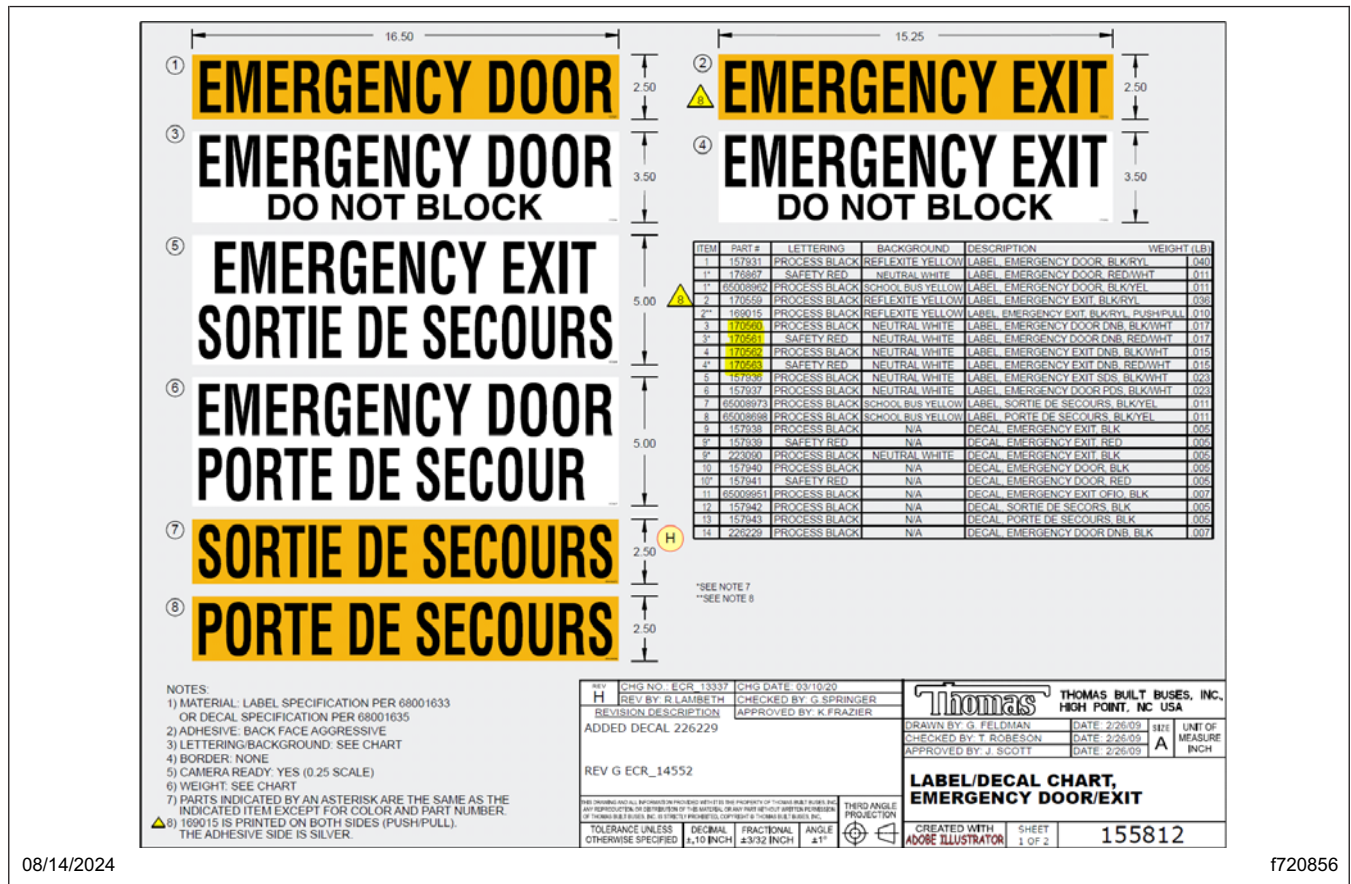


Fig. 2, Examples of the Label

3. The suspected vehicles may fail to meet the Federal Motor Vehicle Safety Standard (FMVSS) 217 5.5.3 (a) requirement, as the letters of the emergency door and emergency exit with DO NOT BLOCK labels are less than 5 cm high.
4. To correct the potential noncompliance, use a red or black oil-based paint pen to increase the letter height.
 - 4.1 **Figure 3** shows circled areas that indicate where the paint pen is used to increase the height of the letters.

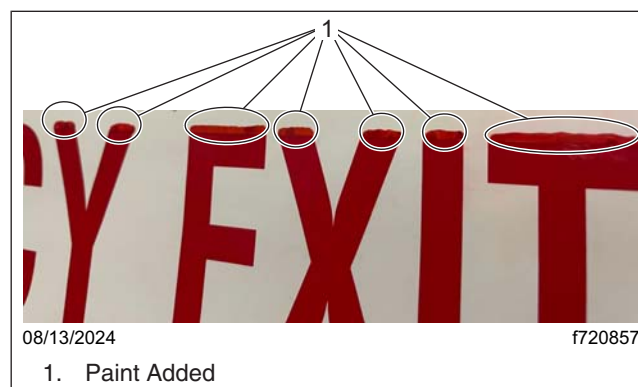


Fig. 3, Paint Added to the Label

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- 4.2 **Figure 4** shows the highlighted areas that need more paint on the letters.



Fig. 4, Highlighted Areas Indicate Letters Needing Paint

- 4.3 Make sure the letter height is 5 cm or more.