

Daimler Trucks North America  
Nasser Zamani  
Senior Manager  
Compliance and Regulatory Affairs

January 8, 2008

Dan Smith  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attention: Recall Management Division (NVS-215)  
1200 New Jersey Avenue S.E.  
Washington D.C. 20590

**Re: Defect Information Report FL-543, TBB Assist Handrail Clearance**

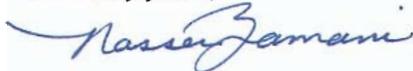
Mr. Smith

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Daimler Trucks North America LLC herewith reports a safety campaign to recall approximately 22,715 Thomas Built Buses Saf-T-Liner C2 School Buses manufactured October 2004 through November 24, 2008 with a potential defect in front entrance door aft handrail location.

Attached is Daimler Trucks North America's Defect Information Report.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Michael Mason, CAL-OSHA  
Enclosure  
Certified Mail# 7004 2890 0004 1202 0928

A Daimler Company

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# DAIMLER

## Defect Information Report

(Section 573.6)

January 8, 2009

**(c)(1) Manufacturer:** Daimler Trucks North America LLC  
P.O. BOX 3849  
Portland, Oregon 97208  
(503) 745-5219

**Brands:** Thomas Built Buses

**(c)(2) Vehicles identification:**

**Model(s) affected:** Saf-T-Liner C2 School buses

**Model Years affected:** 2005 through 2010

**Manufacture Dates:** October 2004 through November 24, 2008

**Basis for determining population:** All Saf-T-Liner C2 school buses built with a front entrance door aft assist handrail combined with a passengers' side restraining barrier.

**Component manufacturer if other than the vehicle manufacturer:** Not Applicable

**(c)(3) Total number of vehicles potentially affected:** Approximately 22,715

**(c)(4) Percentage of vehicles estimated to contain the defect:** 5%

**(c)(5) Description of the defect:** Lower end of front entrance door aft assist handrail may be located too close to step preventing it from passing the NHTSA "Drawstring Test."

**49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety:** It may be possible for items such as drawstrings and straps to become caught on handrails which do not pass the Drawstring Test potentially leading to injury or death.

**(c)(6) Chronology of principal events:** Thomas Built Buses was informed of potentially non conforming buses on 11/20/08.

**(c)(7) Noncompliance-test or other data:** Drawstring Test

**(c)(8) (i) Remedial program:** Potentially affected buses will be inspected to determine if they pass the Drawstring Test. Assist handrails on non conforming buses will be relocated to ensure conformance with the Drawstring Test. Repairs will be performed by Thomas Built Buses dealerships and Direct Warranty customers, i.e., customers approved by Thomas Built Buses to do their own warranty repairs

**Reimbursement Plan:** Copies will be submitted as a supplemental report when available.

**(ii) Estimated Owner and Dealer Notification Date:** Customer notification will be by first class mail using Daimler Trucks North America records to determine the customers affected. This will be completed approximately March 6, 2009

Dealer notification will be completed approximately March 6, 2009

**(c)(9) Information for tire recalls:** Not Applicable

**(c)(10) Communications sent to manufacturers, dealers and owners:** Copies will be submitted as a supplemental report when available.

**(c)(11) Manufacturer's campaign number:** FL-543