DAIMLER

Defect Information Report

(Section 573.6)

FL-832

Date of Submission: ***October 4th, 2019***

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

Type of Report: ◯ **Safety Defect** X **Non-Compliance**

Vehicle Information

Model Yr. Start: *With S3B seat: 2015 and with S3C RTR seat: 2014* **Model Yr. End:** *2020*

Make: *Thomas Built Buses*

Model: *Saf-T-Liner C2, Saf-T-Liner HDX, Saf-T-Liner EFX, and Minotour*

Production Dates: **Begin:** *With S3B seat: 08/18/2014 and with S3C RTR seat: 7/5/2013*
End: *With S3B seat: 08/15/2019 and with S3C RTR seat: 8/15/2019*

Descriptive Information:

Certain Thomas Built School Buses equipped with SynTec S3B and S3C seats.

Number potentially involved: *53,528* **Estimated percentage of involve with defect:** *50%*

Defect / Noncompliance Description

For this Defect/Noncompliance:

Per SynTec 573 filing "In the relevant population, certain specific areas of the seat back may not meet the requirements of S5.3.2 Federal Motor Vehicle Safety Standard (FMVSS) 222."

Describe the defect or noncompliance:

Per SynTec 573 filing "The suspect population of seats were made with styrene blocks that have the potential to not meet the requirement of S5.3.2 Federal Motor Vehicle Safety Standard (FMVSS) 222".

If a noncompliance, provide the applicable FMVSS:

FMVSS 222 S5.3.2

◯ **Check if this recall only affects products in certain geographic regions.**

Describe the safety risk:

Per SynTec 573 filing "The suspect population of seats were made with styrene blocks that have the potential to not meet the requirement of S5.3.2 Federal Motor Vehicle Safety Standard (FMVSS) 222, which may increase the risk of injury to the occupants in a crash. There have been NO reported injuries or accidents related to this defect."

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

SynTec Seating Solutions, LLC

Chronology of Defect / Noncompliance Determination

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

March 2019, DTNA received report from Transport Canada of non-complying test results on 2 of 4 seats tested for knee foam impact. DTNA contacted its supplier, SynTec, and SynTec launched investigation, including review of design history, validation and conformance testing, product changes, testing history, changes in test methodology, test equipment, manufacturing changes and variability, sub-supplier issues and other matters potentially contributing to the reported test result. June 2019, DTNA and SynTec representatives visited Transport Canada to review tested seats. Teardown of the seats indicated variation of the position of the knee styrene block to the seat frame. July - August 2019, SynTec initiates various impact tests in an effort to duplicate failure mode. This includes process trials, gluing methods, styrene positioning, and density studies to recreate field issue. August 2019, SynTec initiates design change to styrene block to improve resisting force as an improvement measure while investigation continues. September 2019, as a result of internal seat and component level testing, combined with difficulties in visually identifying manufacturing variation in the positioning of the styrene block, SynTec concludes that a non-compliance could potentially exist on any S3B and S3C seat in the subject population. September 30th, 2019 DTNA with an abundance of caution, decided to conduct a voluntary recall campaign on certain school buses equipped with SynTec S3B and S3C seats. October 2019, SynTec officially notifies DTNA of their 573 filing.

Identify the Remedy

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

Seats will be augmented by installation of an additional impact material between the re-bond back and the vinyl back cover to assure compliance with pertinent requirements. The impact material can be installed in the vehicle without taking the bus out of service. Repairs will be performed by Daimler Trucks North America authorized service facilities. Copies of the reimbursement plan will be submitted as a supplemental report when available.

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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:	*12/02/2019*
Planned Dealer Notification End Date:	*12/02/2019*
Planned Owner Notification Begin Date:	*12/02/2019*
Planned Owner Notification End Date:	*12/02/2019*

Manufacture's identification code for this recall (if applicable): *FL-832*

DTNA Representative;

Andy Jones
Manager
Compliance and Regulatory Affairs