Defect Information Report

(Section 573.6)

FL-812 Amended

Date of Submission: April 1st, 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: 2019

Model Yr. End: 2019

Make: Western Star Model: 4700 & 4900

Production Dates:

Begin: August 10, 2018

End: November 30, 2018

Descriptive Information:

Certain trucks built within the production dates equipped with certain speedometers.

Number potentially involved: 361 Estimated percentage of involve with defect: 60%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance: Distance traveled is accumulated in kilometers by the odometer but the label on the dial face says miles. FMVSS 101 Table 2 requires if distance is accumulated in kilometers the display needs to be labeled in kilometers.

If a noncompliance, provide the applicable FMVSS: FMVSS 101

Describe the safety risk:

The display of the vehicle's accumulated distance in kilometers while the gauge is labeled miles, could lead to driver confusion, and inspections and maintenance may occur sooner than needed, as well as possible incorrect assumptions about driver speed.

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

DAIMLER

Chronology of Defect / Noncompliance Determination

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

In November 2018, DTNA received a customer complaint regarding an odometer alleged to be displaying distance in Kilometers, while it was labeled miles. November, 2018 through January 2019, DTNA investigated the issue to identify scope, root cause and population. DTNA also reached out to external counsel as part of the investigation. February 2019, DTNA received clarification from outside counsel that the issue may be non-compliant with FMVSS 101. February 28, 2019, DTNA decided to voluntarily recall the affected vehicles. April 1st, 2019, Because DTNA could not verify that all vehicles slated to be remedied prior to shipping from the plant were in fact remedied prior to shipment, based on plantsupplied information, DTNA, from an abundance of caution, decided to increase the recall population to include all vehicles built with the involved speedometers from start of production until the known clean date on the production line.

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

Vehicles will be inspected by Daimler Trucks North America authorized service facilities and where odometers are found to be displaying kilometers, the speedometers will be replaced. Copies of the reimbursement plan will be submitted as a supplemental report when available.

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:

05/03/2019

Planned Dealer Notification End Date:

05/03/2019

Planned Owner Notification Begin Date:

05/03/2019

Planned Owner Notification End Date:

05/03/2019

Manufacture's identification code for this recall (if applicable): FL-812

DTNA Representative;

Andy Jones

Manager

Compliance and Regulatory Affairs

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