DAIMLER

Amended Defect Information Report

(Section 573.6)

FL-863

Date of Submission: ***April 6, 2020***

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

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

Vehicle Information

Model Yr. Start: *2017* **Model Yr. End:** *2021*

Make: *Freightliner*

Model: Cascadia P4

Production Dates: **Begin:** *03/08/2016*
End: *01/03/2020*

Descriptive Information:

Vehicles built with a certain pressure switch within the above referenced build dates.

Number potentially involved: 128,269 **Estimated percentage involved with defect:** 5%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

On certain vehicles, the brake lights may remain on after release of brake pedal.

If a noncompliance, provide the applicable FMVSS

Describe the safety risk:

Brake lights remaining on may prevent accurate communication to following vehicles. While the brakes lights are on, with additional service brake application, the intensity in brake lights would not change and would not signal to other motorists the intent of the driver to slow the vehicle, potentially leading to an increased risk of a crash.

Supplier Identification:

Component Manufacturer:

Name: Honeywell
Address: 12484 Collection Center Dr

Chicago, IL 606930124

Country: Unites States

Chronology of Defect / Noncompliance Determination

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

In or about March 2019, DTNA received a single field report of brake lights remaining on after the brake pedal was released. As a result, DTNA reviewed relevant warranty rate data to assess the matter. DTNA's analysis, given the information reasonably available, did not indicate an unreasonable risk to safety. In or about June 2019, DTNA received second field report of brake lights remaining on, along with complaints of the cruise control being rendered inoperative due to brake pressure switch malfunction. As a result, in or about July 2019, DTNA commenced an investigation of the matter. DTNA also communicated with NHTSA Office of Defects Investigation (ODI) during this time period regarding its investigation, including making verbal updates and presentations to ODI staff. During this time period, DTNA's analysis, again given the information reasonably available, continued to not indicate an unreasonable risk to safety. In or about January 2020, DTNA's investigation commenced an extensive warranty review. During the pendency of that warranty review, in or about February 2020, DTNA received two additional field reports of brake lights remaining due to brake pressure switch malfunction. Following its analysis, in or about March 2020, DTNA reasonably determined that there was no unreasonable risk to safety within the meaning of the Safety Act and applicable law. In or about May 2020 - July 2020, out of an abundance of caution, DTNA analyzed failed switches for functional and durability testing. DTNA's analysis identified that the pressure switch was mechanically operating as per standard operating requirements, and did not otherwise call into question DTNA's analysis to date. In or about August - early September 2020, conducted a supplemental data review to check for the potential for late in the life failures. DTNA's new data revealed that 24MIS and 36MIS failure rate was high. As a result, on September 14, 2020, out of an abundance of caution, DTNA reasonably decided to conduct a voluntary recall as set forth in this report. April 1, 2020, DTNA added supplier identification information.

Identify the Remedy

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

The subject 3-pin brake pressure switch on the affected vehicles will be replaced with 2-pin brake pressure switch along with a jumper harness. Customer notification will be done by first class mail using Daimler Trucks North America records to determine the customers affected. 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: *11/16/2020*
Planned Dealer Notification End Date: *11/16/2020*
Planned Owner Notification Begin Date: *11/16/2020*
Planned Owner Notification End Date: *11/16/2020*
Manufacture's identification code for this recall (if applicable): *FL-863*

DTNA Representative;

Larissa Stoffels
Executive Manager, Vehicle Safety
Compliance and Regulatory Affairs