Defect Information Report

(Section 573.6)

FL-865

Date of Submission: October 16th, 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: 2018 Model Yr. End: 2019

Make: Freightliner, Western Star

Model: 108SD, 114SD, 122SD, 4700, 4900, 5700, Cascadia, Business Class M2

Production Dates: Begin: 04/10/2017

End: 07/02/2018

Descriptive Information:

Vehicles identified with automated manual transmissions with certain Eaton Fuller ECA Clutch between the affected build dates.

Number potentially involved: 6,795 Estimated percentage of involve with defect: 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

As per Eaton Corporation Recall 18E-102: "An internal component within the clutch assembly may be outside of specification and fail, which in special circumstances could cause such clutch component to inhibit clutch departure."

If a noncompliance, provide the applicable FMVSS:

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

Describe the safety risk:

As per Eaton Corporation Recall 18E-102: "In the rare event that the clutch component fails in a manner that prevents the clutch from achieving proper departure, and created a condition that results in the transmission of enough driveline torque to prevent achieving a commanded neutral condition in the vehicle transmission, and the engine idles for a sufficient amount of time to cause driveline torque to

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increase as a result of loss of departure in the clutch, it is possible to achieve driveline torque sufficient to overcome the parking brakes, which could cause unintended vehicle motion, potentially resulting in a vehicle impact with prior warning."

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

Chronology of Defect / Noncompliance Determination

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

December 14, 2018, DTNA decided to conduct a voluntary safety recall FL803. Between then and September 2020, DTNA received no notification that the remedy to FL803 was insufficient. In September 2020, DTNA received a report of a vehicle with a clutch malfunction after FL803 recall repair that caused unintended motion of the vehicle. The FL803 recall repair for this vehicle was a transmission software update. As a result, DTNA reviewed the incident with the clutch supplier and confirmed that the unintended movement of the vehicle was due a clutch failure. As a result, on October 12, out of an abundance of caution, DTNA reasonably decided to conduct a voluntary recall as set forth in this report. This recall will supersede FL803.

Identify the Remedy

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

A software update will be performed and the clutches will be replaced. 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.

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:12/14/2020Planned Dealer Notification End Date:12/14/2020Planned Owner Notification Begin Date:12/14/2020Planned Owner Notification End Date:12/14/2020

Manufacture's identification code for this recall (if applicable): FL-865

DTNA Representative;

Larissa Stoffels

Executive Manager, Vehicle Safety Compliance and Regulatory Affairs