

Amended Defect Information Report (Section 573.6)

FL-907

Date of Submission: *November 12, 2021 (amended January 18, 2022)*

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

Type of Report: Safety Defect Non-Compliance

Vehicle Information

Model Yr. Start: 2017 **Model Yr. End:** 2019

Make: Western Star

Model: 4700, 4900, 5700 & 6900

Production Dates: **Begin:** 10/18/2016 **End:** 02/06/2018

Descriptive Information: *Certain Western Star vehicles built with a pass through power stud that were within the population of FL766.*

Number potentially involved: 6,100 **Estimated percentage of involve with defect:** 1%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

This submission amends the recall remedy in prior DTNA Recall No. FL766 / NHTSA Recall No. 18V-191, moving from an inspect and replace remedy, to replacing the appropriate component in the subject recall population. On certain Western Star vehicles built with a pass through power stud and attached foam gasket seal mounted through the bulkhead, in certain instances a potential exists for contact between the power stud and bulkhead resulting in potential arcing.

Describe the safety risk:

Arching of a power cable between the stud and bulkhead could increase the risk of a fire.

Identify any warning which can precede or occur: N/A

If applicable, identify the manufacture of the defective or noncompliant component.: N/A

Involved Components

Component Name: Pass-Thru Stud

Component Description: STUD - PASS-THRU, ELECTRICAL

Component Part Number: A23-14242-000, A23-14242-001, A23-14242-002, A23-14242-003

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 2018, DTNA recalled certain Western Star vehicles (DTNA Recall No. FL766, NHTSA Recall No. 18V-191). The recall remedy involved, among other things, an inspection of the pass through power stud for clearance to the bulkhead, and if required, replacement of the appropriate component.

Throughout 2018 and 2019, DTNA met with NHTSA's Office of Defects Investigation (ODI) in monthly, voluntary SEL meetings where, among other things, DTNA discussed with ODI data and analysis regarding post-recall incidents in DTNA Recall No. FL766/NHTSA Recall No. 18V-191, and the adequacy of the inspect and replace approach was discussed. DTNA continued in good faith to believe the remedy adequate and otherwise did not present further unreasonable risk to safety, and ODI concurred.

Later, in or about April 2021, DTNA decided to reconsider the inspect and replace remedy approach given certain new data (identified below), opened an investigation, and added that new investigation to the ODI SEL spreadsheet for discussion with ODI during continued monthly SEL discussions with the agency, as required by the agency's December 2020 consent order.

In or about April to late September 2021, DTNA analyzed plant quality data, field service information, warranty data, and inspected exemplar vehicles. DTNA's analysis identified the potential that field operator routine maintenance/cleaning using high pressure power-washing equipment could be introducing additional water intrusion risk that was not reasonably foreseen in prior analysis in DTNA Recall No. FL766/NHTSA Recall No. 18V-191, or in discussions with NHTSA ODI, as well as the possibility that field technicians were encountering inspection challenges that were, likewise not reasonably foreseen.

DTNA's analysis continued and, in or about late September 2021, DTNA received a report of an additional thermal event that occurred on a vehicle in March 2021, where it appeared that, the thermal event occurred shortly after the vehicle had been high pressure power washed. DTNA's analysis further continued, and in early November 2021, DTNA received inspection results on three additional exemplar vehicles, one of which showed a pass through stud that, in DTNA's judgement, should have been replaced by the field technician, but was not.

On Thursday, November 4, 2021, DTNA decided to amend the recall remedy in prior DTNA Recall No. FL766/NHTSA Recall No. 18V-191, moving from an inspect and replace remedy, to replacing the appropriate component in the subject recall population. At all relevant times, as the agency knows from its discussions with the company to date, DTNA in good faith believed the remedy to be adequate and otherwise did not present further unreasonable risk to safety.

Identify the Remedy

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

The pass through power studs will be replaced in the subject population. Repairs will be performed by Daimler Trucks North America authorized service facilities. Details of the reimbursement plan will be included in the owner's notification letter.

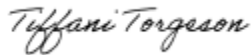
Identify the Recall Schedule

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.*

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|--|-------------------|
| Planned Dealer Notification Begin Date: | <i>01/09/2022</i> |
| Planned Dealer Notification End Date: | <i>01/09/2022</i> |
| Planned Owner Notification Begin Date: | <i>01/09/2022</i> |
| Planned Owner Notification End Date: | <i>01/09/2022</i> |

Manufacture's identification code for this recall (if applicable): *FL-907*

DTNA Representative;



Tiffani Torgeson
Manager
Compliance and Regulatory Affairs