

Defect / Noncompliance Information Report

(Section 573.6)

FL946

Date of Submission: 8/11/2022

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

Type of Report: Safety Defect Non-Compliance

Vehicle Information

Model Yr. Start: 2014 **Model Yr. End:** 2022

Make: Thomas Built Buses

Model: HDX and EFX

Production Dates: **Begin:** 5/24/2013 **End:** 10/22/2021

Descriptive Information: The subject population includes approximately 1,808 Model Year 2014-2022 Thomas Built Bus ("TBB") HDX and EFX school bus vehicles produced within the above-specified production date range in the United States.

Basis for Determination of the Recall Population: Under certain extreme operating conditions, that may include adverse road conditions, a metal fatigue-related cracking may develop on 39 inch S3C seat frames with a 3-point flex belt seat rear wall mount bracket. Over time, if the condition manifests itself, the crack may propagate and lead to fracturing of the wall mount bracket.

Number potentially involved: 1,808

Estimated percentage of involved with defect: 4%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

The subject vehicles are equipped with specific passenger seats that may experience abnormal structural fatigue that may impact seat strength during a crash. Root cause has not yet been determined.

Describe the safety risk:

Fatigue of the seats frame structure could result in frame cracking, thus causing the seat to shift and rotate. The seat may therefore not provide adequate restraint to a belted passenger, which may increase the risk of injury to vehicle occupants in a crash.

Description of the Cause: TBB continues to investigate root cause.

Identify any warning which can precede or occur:

A fractured seat frame mounting bracket may be noticed during daily walk through, cleaning, bus inspections and routine maintenance.

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

Involved Components

Component Name: Passenger Seat Frame

Component Description: Seat Lower Frame

Component Part Number: 30628, 30630

NOTE: If a Component that contains the defect or noncompliance was manufactured by a different manufacturer from the reporting manufacturer, list the following:

Component's country of origin:

Business address:

Business telephone number:

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 mid-2017, DTNA's seat supplier informed DTNA of a fractured S3C seat frame. DTNA reviewed the matter, concluded it did not present a safety-related concern, and documented the matter. In or about September 2018, DTNA received several reports of fractured seat frames from one specific customer location. Thereafter, DTNA began an investigation, which included field inspections, engineering laboratory evaluations and field tests. Upon review, DTNA concluded that the matter did not present a safety-related concern, and again documented the matter but also monitored the situation. During this period of monitoring, in or about late 2019, DTNA concluded that the issue, if it manifested, was limited to very small numbers of seats concentrated in a specific geographic location. A root cause such as uniquely severe road use/environmental use cases was conjectured but not fully understood, given the limited information available. That said, DTNA again reaffirmed its prior analysis that the matter did not present an unreasonable risk to safety within the meaning of the Safety Act.

March 08, 2022, DTNA received a report from a customer with buses containing cracked seat wall mount brackets. DTNA began an extensive investigation to reassess its prior analysis. Among other things, TBB conducted an on-site customer visit to assess the alleged condition, inspect available field units, and analyze the resultant fleet inspection information. On March 28, 2022, DTNA completed a review of warranty claims and found no claims on vehicles affected by this recall. In April 2022, DTNA analyzed its preliminary investigation findings and based on engineering judgement initiated additional evaluations including further field data assessment studies to understand why the issue appeared to arise in only certain geographic areas, with certain fleets and with vehicles that may have been subjected to more severe road use/environmental use cases. In May 2022 through late June 2022, DTNA re-investigated the additional information collected from a broader field survey and determined that 8 seats were observed from of a population of 13,037 vehicles where the rear wall mount bracket were fractured. Further data searches indicated claims for replaced seat frame mounts. No reports of any injuries or fatalities could be identified related to this defect. On July 12 2022, DTNA determined that a safety-related defect exists in HDX and EFX Thomas Built Buses equipped with 39-inch S3C seat frames and with 3-point flex seatbelts. The seat frames and seatbelts otherwise conform to all applicable Federal Motor Vehicle Safety Standards. In early August 2022, while continuing to investigate this issue, DTNA discovered an accounting error whereby some potential vehicle groups were counted multiple times, resulting in an inflated suspect population. The suspect population has been corrected with this filing.

Identify the Remedy

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

DTNA does not have a remedy identified at this time. DTNA will provide the appropriate information as soon as it is 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: 9/16/2022

Planned Dealer Notification End Date: 9/16/2022

Planned Owner Notification Begin Date: 9/16/2022

Planned Owner Notification End Date: 9/16/2022

Does DTNA plan to file inconsequentiality petition? Yes No

Manufacturer's identification code for this recall (if applicable): **FL946**

DTNA Representative;



Sam Canupp
Manager, Compliance and Regulatory Affairs