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11V-465
(3 Pages)

Daimler Trucks North America
Nasser Zamani
Senior Manager
Compliance and Regulatory Affairs

September 2, 2011

Dan Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue S.E.
Washington D.C. 20590

Re: Defect Information Report FL-6 12, Electronic Stability Control (ESC)

Mr. Smith

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Daimler Trucks North America LLC herewith reports a safety campaign to recall approximately 4,700 Freightliner and Sterling vehicles manufactured September 15, 2005, through September 1, 2011, and equipped with Meritor WABCO Electronic Stability Control systems which activate unnecessarily on certain roadways.

Attached is Daimler Trucks North America's Defect Information Report.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Amy Martin, Chief Counsel, CAL-OSHA
Enclosure
Certified Mail# 7006 3450 0003 7727 0797

A Daimler Company

Daimler Trucks North America LLC
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Defect Information Report (Section 573.6)

September 2, 2011

(c)(1) Manufacturer: Daimler Trucks North America LLC
P.O. BOX 3849
Portland, Oregon 97208
(503) 745-5219

Brands: Freightliner, Sterling

(c)(2) Vehicles identification:

Model(s) affected:

Freightliner: Business Class M2, Cascadia, Century, Columbia, Coronado

Sterling: A-Line

Model Years affected: 2006 through 2012

Manufacture Dates: September 15, 2005, through September 1, 2011

Basis for determining population: Vehicles built with Meritor WABCO Electronic Stability Control (ESC)

Component manufacturer if other than the vehicle manufacturer:

Meritor WABCO Vehicle Control Systems

Attn: Alan Korn, (248) 435 - 4498

(c)(3) Total number of vehicles potentially affected: Approximately 4,700 U.S. and Canada

(c)(4) Percentage of vehicles estimated to contain the defect: Unknown

(c)(5) Description of the defect: Under certain road and driving conditions involving tight, successive, highly banked curves in opposite directions, vehicle body roll and road inclination characteristics may adversely affect the slip angle calculation by the Meritor WABCO Electronic Stability Control (ESC) system. This might cause the ESC to perceive an oversteering situation and therefore apply the outer wheel brake on the front axle until the vehicle is perceived to be stable. This unnecessary brake intervention may pull the vehicle out of the curve, requiring the driver to counter steer in order to keep the vehicle on the intended path. If the driver is slow to react during this described ESC intervention, the vehicle may deviate from the intended line of travel. All known, unexpected ESC activations have occurred on a short stretch of California HWY 41 between Oakhurst and Fish Camp with S-curves banked at 6 to 10 degrees.

49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety: Under certain road and driving conditions involving tight, successive, highly banked curves in opposite directions, vehicle body roll and road inclination characteristics may lead to unnecessary ESC brake intervention which might cause the vehicle to deviate from the intended line of travel. Failure to keep the vehicle on the intended line of travel may result in a crash.

(c)(6) Chronology of principal events: First report of an unnecessary ESC activation received in August 2010. Extensive testing conducted between August 2010 and June 2011 was unable to duplicate the reported issue. The potential for unnecessary ESC activation was verified on one vehicle in June 2011. Through further testing it was concluded that unnecessary ESC activation could occur on certain vehicles Equipped with WABCO ESC when driven on roadways with S-curves banked at 6 to 10 degrees. On August 30, 2011, DTNA decided to initiate a voluntary safety campaign to modify affected vehicles.

(c)(7) Noncompliance-test or other data: Not Applicable

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(c)(8) (i) Remedial program: The ESC module will be replaced on affected vehicles equipped with ABS ECUs using E4.2 or higher software versions. Affected vehicles equipped with ABS ECUs using E4.1 software versions may require both the ABS ECU and the ESC module to be replaced. Repairs will be performed by Daimler Trucks North America authorized service facilities

Reimbursement Plan: Copies will be submitted as a supplemental report when available.

(ii) Estimated Owner and Dealer Notification Date: Interim Customer notification will be by first class mail using Daimler Trucks North America records to determine the customers affected. This will be completed approximately November 1, 2011. The date for availability of the final remedy is subject to validation testing and parts availability. Remedy availability is expected to be no later than March 30, 2012.

Dealer and distributor notification will be completed approximately one week prior to owner notification.

(c)(9) Information for tire recalls: Not Applicable

(c)(10) Communications sent to manufacturers, dealers and owners: Copies will be submitted as a supplemental report when available.

(c)(11) Manufacturer's campaign number: FL-612