



A Subsidiary of **FREIGHTLINER**
CORPORATION

June 30, 2009

Thomas Built Buses, Inc.
PO Box 2450 (27261)
1408 Courtesy Road
High Point, NC 27260
(336) 889-4871 Phone
(336) 889-2589 Fax

To: State Directors of School Bus Transportation

Good morning:

In October of last year the National Highway Traffic Safety Administration (NHTSA) released its final notice of proposed rule making concerning changes to FMVSS 222. This notice affects the requirements of school bus passenger seating. There were four components of this notice that will affect the manufacture of school buses. In summary, they were:

1. Increases in the minimum seat back height requirement from 20" to 24" from the seating reference point.
2. Requirements that all school bus seat bottom cushions that are designed to flip up or be removable without tools, to have a self-latching mechanism.
3. New small school buses of 10,000 lbs or less GVWR shall have Type 2 lap/shoulder belts in lieu of the lap belts currently required.
4. Sets new performance standards for seat belts *voluntarily* installed on large school buses with a GVWR greater than 10,000 lbs.

There were two effective dates established with the requirements. As of October 21, 2009, all manufacturers will have to conform to the first two items listed. Items three and four will come into effect on October 21, 2011.

Beginning October 21, 2009, all school buses manufactured for use in the United States, will have to conform to the new seat back height of 24" from the seating reference point. Some states currently require that seat backs conform to this new height. This new height also carries a new square inch requirement for the size and shape of the seat back. Our Thomas/Syntec seat back will change to meet the square inch requirement. This means that seat backs manufactured after October 21, 2009 will be a different shape than the high back seat backs currently used in some states and will not be interchangeable.

As of October 21, 2009 we will no longer manufacture a seat cushion that will flip forward or be removed without tools. The seat cushion will be a 'fixed' or permanent design that will require a screw driver to be removed. The fixed seat cushion will allow us to comply with the new FMVSS 222 requirements.

The purpose of this letter is to inform you that in the next few weeks we will begin quoting the new seating requirements on new bids. Our backlogs are such that we have filled all slots prior to the cut off date of October 21, 2009. There will be a per seat price increase reflected with the required changes.

IMMI Safeguard seats have completed design work on their new thin back seats. There should be no price increase reflected at this time on this product. Freedman Family School Bus seats already comply so pricing will remain in effect.

For our Canadian customers we will continue with the current 41" Low back seat installation. However there will be a slight price increase as we change the seat cushion installation to be the same as for the USA.

We appreciate the opportunity to discuss these items with you. If you have any questions, or if we can be of any further assistance, please feel free to give Greg Elmore or myself a call. Greg can be reached at 336-881-7270, or his email address james.elmore@daimler.com. I can be reached at 336-841-5927, or my email address ricky.stanley@daimler.com.

Sincerely,

Ricky Stanley

Ricky Stanley
State Specifications Coordinator

Cc: Greg Elmore
Joe Dominick
Ken Whisnant
Herbert Mehnert
Ken Hedgecock
Thomas Built Bus Dealers

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a DaimlerChrysler Company