U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Administrator

400 Seventh St., S.W.
Washington, D.C. 20590

DEC 14 2004

The Honorable Allen Boyd
Member, U.S. House of Representatives
301 South Monroe Street, Suite 108
Tallahassee, FL 32301

NVS-216 mjj
Ref. # 10092570

Dear Congressman Boyd:

Thank you for your facsimile dated August 18, 2004, on behalf of your constituent, Mr. Carmen J. Narde. Mr. Narde wrote concerning problems he has encountered with the parking brake system in his model year (MY) 2000 Forest River Georgetown motorhome. The Federal Motor Carrier Safety Administration forwarded your correspondence to the National Highway Traffic Safety Administration (NHTSA) for a response. NHTSA received the inquiry on September 16, 2004.

NHTSA is the Federal agency responsible for improving safety on our Nation's highways. We are authorized to order manufacturers to recall and repair vehicles or items of motor vehicle equipment when our investigations indicate that they contain serious safety defects in their design, construction, or performance. In order for the agency to initiate an investigation, we look carefully at the body of consumer complaints and other available data to determine whether a defect may exist. We seldom act on isolated problems and do not resolve disputes between individual owners, dealers, or manufacturers.

We appreciate the report you provided on behalf of Mr. Narde and the previous report he submitted directly to the agency, which was received on August 4, 2004. Reports from motorists are a very important source of information for us. Each report is entered into a database to help us determine whether an investigation into a possible safety defect is warranted.

During December 1999, Workhorse Custom Chassis (Workhorse) purchased the design of the General Motors Corporation (GM) Auto-Park parking brake system for future use in motorhomes utilizing a Workhorse chassis, such as MY 2000 Forest River Georgetown motorhomes. With respect to allegations of malfunctioning parking brake systems in motorhomes utilizing GM's Auto-Park parking brake system, on January 26, 1999, NHTSA's Office of Defects Investigation (ODI) opened a safety defect investigation (PE99-006) into a variety of MY 1995 through 1998 Class A motorhomes. On July 26, 1999, ODI upgraded that investigation to an engineering analysis (EA99-021) and expanded the scope of the investigation to include MY 1994 through 1999 Class A motorhomes. An engineering analysis is a more comprehensive technical analysis of the character and scope of an alleged defect.

During the course of ODI's investigation, it became apparent that some owners of the subject motorhomes were not aware of the complexities associated with how the Auto-Park parking brake system functions. Some were unaware of the precautions to be heeded in its use, and/or how to determine when the system required service or adjustment. On June 11, 2001, following discussions between GM and ODI representatives, GM notified NHTSA that it would mail a letter to all owners of Class A motorhomes utilizing GM's P30 motorhome chassis. GM's letter explained a procedure that owners should use to check the parking brake system to see if it was in adjustment, contained a warning to owners concerning abuse or misuse of the parking brake system, described the potential consequences of such misuse, and contained tips on how to park the motorhome safely. On June 21, 2001, ODI closed EA99-021. For your information, we are enclosing copies of our closing report and GM's letter to vehicle owners. Recently, in October 2004, GM issued a follow-up letter to vehicle owners as a reminder to properly maintain and check the Auto-Park parking brake system to ensure that it is operating as designed.

Following receipt of your correspondence, an investigator from ODI telephoned Mr. Narde to discuss his concerns in detail. During the investigator's telephone call, Mr. Narde explained his concerns and suggested that NHTSA offer a public service by providing information about the Auto-Park parking brake system to consumers through various publications that serve the recreational vehicle user industry.

ODI continues to review its complaints database for reports alleging malfunctions of the Auto-Park parking brake system in motorhomes utilizing both the GM and Workhorse motorhome chassis and, in certain cases, interviews the owners who have reported a problem in an effort to obtain detailed information concerning the alleged failures. ODI continues to receive complaints as the affected motorhomes age and problems associated with maintenance, second-hand ownership issues, etc., increase. ODI's assessment of this issue has not changed. As these vehicles age, it is important that the parking brake system be checked on a routine basis to ensure that appropriate maintenance is performed and to ensure that the system operates correctly. Therefore, ODI contacted Workhorse and suggested they consider issuing a similar letter to that which GM issued. Workhorse has considered ODI's suggestion and advised ODI that they plan to issue a similar letter before the end of December, 2004.

I hope this information is helpful. If you have any questions, please contact Mr. Ronald L. Medford, Senior Associate Administrator for Vehicle Safety, at (202) 366-1810.

Sincerely yours,

Jeffrey W. Runge, M.D.

Enclosures

cc: Washington Office

U.S. Department of Transportation
National Highway Traffic Safety Administration

# ODI RESUME

INVESTIGATION: EA99-021 DATE CLOSED: 21 -JUN-01
SUBJECT: Alleged Parking Brake Malfunction DATE OPENED: 26-JUL-99
PROMPTED BY: PE99-006
PRINCIPAL ENGINEER: June 97- Feb 01, Bob Young; Feb 01 - June 01, S. B. York

MANUFACTURER: General Motors Corporation (GM)
MODEL(S): P-3 Motorhome Chassis with J71 Auto-Park Parking Brake System
MODEL YEAR(S): 1995 - 1998
VEHICLE POPULATION: 39,247

PROBLEM DESCRIPTION: Complainants allege that the parking brake will malfunction while driving or the vehicle will roll away when parked.

FAILURE REPORT SUMMARY

| | ODI | MANUFACTURER | TOTAL |
|---|---|---|---|
| COMPLAINTS: | 30 | 319 | 349 |
| CRASHES: | 1 | 9 | 10 |
| INJURIES: | 1 (minor) | 0 | 1 |
| FIELD REPORTS: | 0 | 0 (*) | 0 |
| OTHER: | 0 | 0 | 0 |

DESCRIPTION OF (*): Field reports are included in the 319 GM complaints.

ACTION: This Engineering Analysis has been closed.

ENGINEER: S B York 6/20/01 DATE
DIV CHF: Richard Boyd 6/20/01 DATE
OFC DIR: 6/21/01 DATE

ENGINEERING ANALYSIS CLOSING REPORT ATTACHED:

VRS 7-11-01

# ENGINEERING ANALYSIS CLOSING REPORT

**SUBJECT: 1995 - 1998 General Motors P-3 Motorhome Chassis with the J71 "Auto-Park"**

**EA No.: 99-021** **Date Opened: 26-JUL-99** **Date Closed: -JUN-01**

**BASIS: PE99-006 (opened January 26, 1999)**

**THE ALLEGED DEFECT:** Owners allege that, when parked, the parking brake will slip and the vehicle will "roll away" or will self apply while the vehicle is underway.

**DESCRIPTION OF COMPONENT OR VEHICLE SYSTEM:** General Motors (GM) manufacturers the subject P-3 chassis and sells the chassis to various motorhome manufacturers that fit the motorhome body and complete the vehicle. The GM supplied chassis, as supplied to the motorhome manufacturers, comes equipped with the engine, transmission, and braking systems. The transmission is automatic by design but does not have a "park" pawl in the transmission to mechanically hold the vehicle in place while parked, as with most automatic transmissions on passenger cars. Figure 1 depicts a representative motorhome. The lower half of the figure shows the GM chassis as received by the motorhome manufacturers.

**Figure 1**

NOTE: Prior to the following explanation of the subject parking brake system, it should be noted that from 1995 to 1997 the subject vehicles were equipped with a parking brake foot pedal and beginning in July, 1997 (the start of the 1998 model year), the parking brake pedal was replaced with a parking brake activating pull button. **Figure 2** depicts the pre-1998 model year push-to-apply foot pedal parking park applier and **Figure 3** depicts the under dash mounted pull-to-apply style.

**Figure 2**

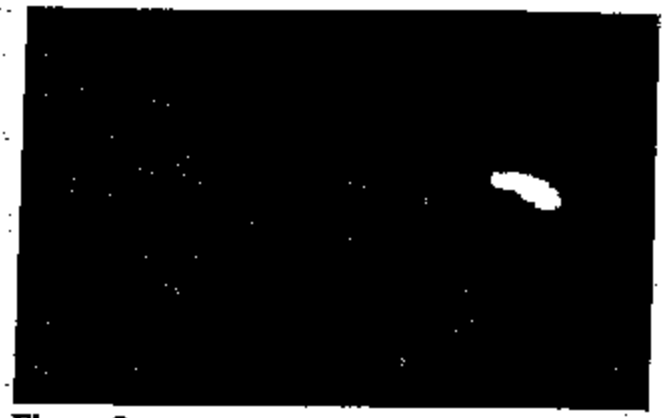

**Figure 3**


**Figure 4**

The steering column mounted gear shift lever does have a marked position ("P") for park (**Figure 4**). When the gear shift lever is moved into this position, as there is no mechanical park pawl in the transmission, the "Auto-Park" system is activated. The Auto-Park system consists of a brake drum that is mounted around the drive-shaft of the vehicle and a set of brake shoes that are held in the applied position by a cable that is pulled by a large spring located inside the brake activator. This "spring brake" system is very similar to the spring brakes used on the trailers of 18 wheel tractor/trailer trucks. Many drivers of motor homes are apparently not familiar with the operation of spring brake systems. Traditional parking brakes on passenger cars require the driver to apply pressure to the hand or foot

operated parking brake to force the parking brake shoes outward into contact with the parking brake drum. This understanding of how the parking brake normally works has led to the belief that the harder you push the pedal or pull on the handle, the tighter the parking brake shoes lock against the brake drums and the more unlikely it is that the vehicle can move with the parking brakes applied. However, when using the spring brake type of parking brake, the shoes are applied by spring pressure and the contact of the brake shoes to the brake drum is limited by the pressure exerted by the brake spring inside the parking brake activator. Following is a simple description of the way the subject Auto-Park system works.

1. When the vehicle is shifted out of the park position and/or the parking brake pull button is pushed in, an activation cam starts a process that results in hydraulic fluid, under pressure, moving a piston that, in turn, compresses the internal spring in the parking brake activator. This compression of the parking brake spring releases the parking brake shoes from contact with the parking brake drum. Hydraulic pressure must be maintained while the vehicle is underway, or the spring will reapply the parking brake.

2. When the vehicle is stopped and shifted into the park position or if the parking brake button is activated (pulled out), the activation cam reverses and the hydraulic pressure is released. The release of this pressure allows the spring in the parking brake activator to apply pressure to the parking brake shoes.

A more detailed description of the Auto-Park operation follows in the "**ODI ANALYSIS**" section of this report.

**STATUS:**

| Problem Experience | ODI | MFR | Total |
|---|---|---|---|
| Owner Reports | 30 | 319 | 349 |
| Field Reports | | (*) | |
| Lawsuits | | 0 | 0 |
| Collision Incidents | 1 | 9 | 10 |
| Injury Incidents | 1 | 0 | 1 |
| Injuries | 1(minor) | 0 | 1 |
| Fatal Incidents | 0 | 0 | 0 |
| Fatalities | 0 | 0 | 0 |

(*) Note: Field reports are included in manufacturer's 319 owner reports.

**CORRESPONDENCE:**

| NHTSA to MFR | MFR to NHTSA | NHTSA to MFR Supplement | Confidentiality | | |
|---|---|---|---|---|---|
| | | | Date of Request | Date of NCC Response | Items Confidential |
| 02/09/00 | 04/12/00 | 06/12/00 | None | | |

**VEHICLE POPULATION:** 39,247

**WARRANTY:** GM reported that it has records of 1,102 warranty claims. The majority of these claims are for GM code H2800, "Parking Brake Adjust."

**SERVICE BULLETINS:**

**November 1994** — GM released two service bulletins (**46-50-08** and **46-81-10**), both bulletins instructed dealers how to adjust the "Auto-Park" system, as instructions had not been included in the dealer's P3 service manual.

**December 1995** — GM released Service Bulletin **56-50-14**. This bulletin requested dealers to inform owners that, as the parking brake pedal pulled the same cable as the Auto-Park" hydraulic cylinder, when the gear shift lever was already in the Park position, the parking brake foot pedal has little or no load when depressed. This was in response to many owners taking vehicles in for parking brake adjustment when the foot pedal seemed to push too easily.

**February 1997** — GM released Service Bulletin **76-50-01**. This bulletin furnished a revised, expanded, and much more detailed description of how to adjust the Auto-Park system. This was in response to consumer requests for more detail regarding proper procedures to adjust the complete J71 system. The bulletin also included a procedure for greasing the power relay connector, in response to warranty claims alleging corrosion at the connector.

DESIGN, MATERIAL, AND/OR PRODUCTION MODIFICATIONS :

In addition to the previously noted change from a foot operated parking brake to the pull button operated system that occurred in July, 1997 (the start of the 1998 model year), the following production changes were made by the manufacturer.

| | |
|---|---|
| **June 1995** | The internal brake lever that applied the parking brake shoes was changed from SAE 1010 steel to HSLA950 steel. This change to a stronger steel was prompted by deformation of the original lever generating warranty claims for improper adjustment. |
| **January 1996** | A more robust wiring harness was introduced with a fuse dedicated solely to the Auto-Park system. Prior to this change power for the Auto-Park system was controlled by a fuse shared by 14 other circuits. If any of the other 14 circuits failed, power to the Auto-Park was also interrupted causing the parking brake to apply.<br><br>At this same time, "PM000771" skin-over grease was added to the harness to provide corrosion protection for the Auto-Park pump relay connector. |

TESTING: Federal Motor Vehicle Safety Standard (FMVSS) No.105, "Hydraulic and Electric Brake Systems," specifies brake requirements for most motor vehicles, including parking brakes. At this time, the requirements for parking brakes only apply to vehicles with a gross vehicle weight rating (GVWR) under 10,000 pounds, with the exception of school buses. School buses, which do weigh over 10,000 pounds GVWR, have to meet the same standard as vehicles under 10,000 pounds GVWR. For school buses with an automatic transmission, which do not have a mechanical "park" locking pawl (such as the subject P-3 motorhome chassis), the vehicle must remain stationary, while parked on a 30 degree grade for 5 minutes, when held in position by only the vehicle parking brake.

In June, 1999, ODI visited Fleetwood Motorhome Service Center in Decatur, Indiana. Two vehicles were inspected and tested. One was a 1996 Fleetwood Storm model and the second a 1998 Fleetwood Bounder. Both were equipped with the subject Auto-Park system. After inspecting both vehicles, to insure that the Auto-Park system was properly adjusted and in good working order, a hill with a grade of approximately 30 degrees was located near the service facility. Each vehicle was parked on the 30 degree grade with only the Auto-Park brake holding the vehicle from rolling. Both vehicles remained stationary in both instances for periods of well over 5 minutes. Although the tested motorhomes are not covered by FMVSS No.105, both would have passed the requirements for school buses, which are over 10,000 pounds GVWR. NHTSA is currently in the process of expanding the parking brake requirements of FMVSS No.105 to cover all vehicles, including vehicles of over 10,000 pounds GVWR.

**Figure 5**

**WARNING SYMPTOMS:** If the pressure in the Auto-Park hydraulic system falls below 1000 psi, a red warning signal, "Auto-Park," appears on the dash immediately in front of the driver (**Figure 5**). This should alert the driver of the possibility that the Auto-Park will self apply while the vehicle is underway.

**FAILURE/MALFUNCTION MODES:** There are basically two possible failure modes:

1. The Auto-Park will self apply while underway, due to a loss of pressure in the Auto-Park hydraulic system.

2. The vehicle will roll away after being parked, due to the Auto-Park not securely preventing drive-shaft rotation.

**MANUFACTURER'S EVALUATION OF THE ALLEGED DEFECT:** GM maintains that the Auto-Park system is more than adequate and works as designed when it is properly adjusted and the Auto-Park brake shoes are not worn below replacement thickness specifications.

**ODI ANALYSIS:**

To understand the problems being experienced by operators of motorhomes using the Auto-Park system, it is necessary to fully envision exactly how the system works.

The chain of chain of events from the movement of the shift lever or the activation of the parking brake button is as follows:

1. The shift lever is moved out of park;

2. This mechanically moves the activation cam;

3. This cam activates an electrical switch which;

4. Supplies current to an electric solenoid, closing a hydraulic valve;

5. This valve, when closed, will direct and maintain pressure inside the Auto-Park brake activation cylinder, moving the piston inside this cylinder;

6. The movement of the piston in the activation cylinder compresses the spring and releases the pull on the cable that applies the parking brake shoes.

7. The activation cam switch, in addition to supplying electrical current to close the hydraulic valve, supplies electrical current to the parking brake hydraulic pump. This pump supplies and maintains a pressure between 1200 and 1600 psi in the parking brake hydraulic system. Should the pressure in this system fall below 1200 psi, the electric pressure switch will close and the pump will activate to restore preasure to 1600 psi.

8. The parking brake pedal on the pre-1998 model year vehicles controls a cable that runs from the parking brake activator to the parking brake shoes. This is the same cable controlled by the auto-park system. If the auto-park system has already activated this cable, then when the foot operated parking brake pedal is depressed, it will move freely, with almost no effort, as the activator spring has already been applied.

9. The 1998 model year dash mounted parking brake button electrically operates the spring brake system exactly as if the shift lever is moved and the cam switch activated.

10. Should a leak in the hydraulic system occur and the pressure cannot be maintained above 1000 psi, a red dash mounted warning light will come on (refer back to **Figure 5**). A drop in pressure while underway can cause the parking brake activator spring to apply the parking brake shoes while the vehicle is moving.

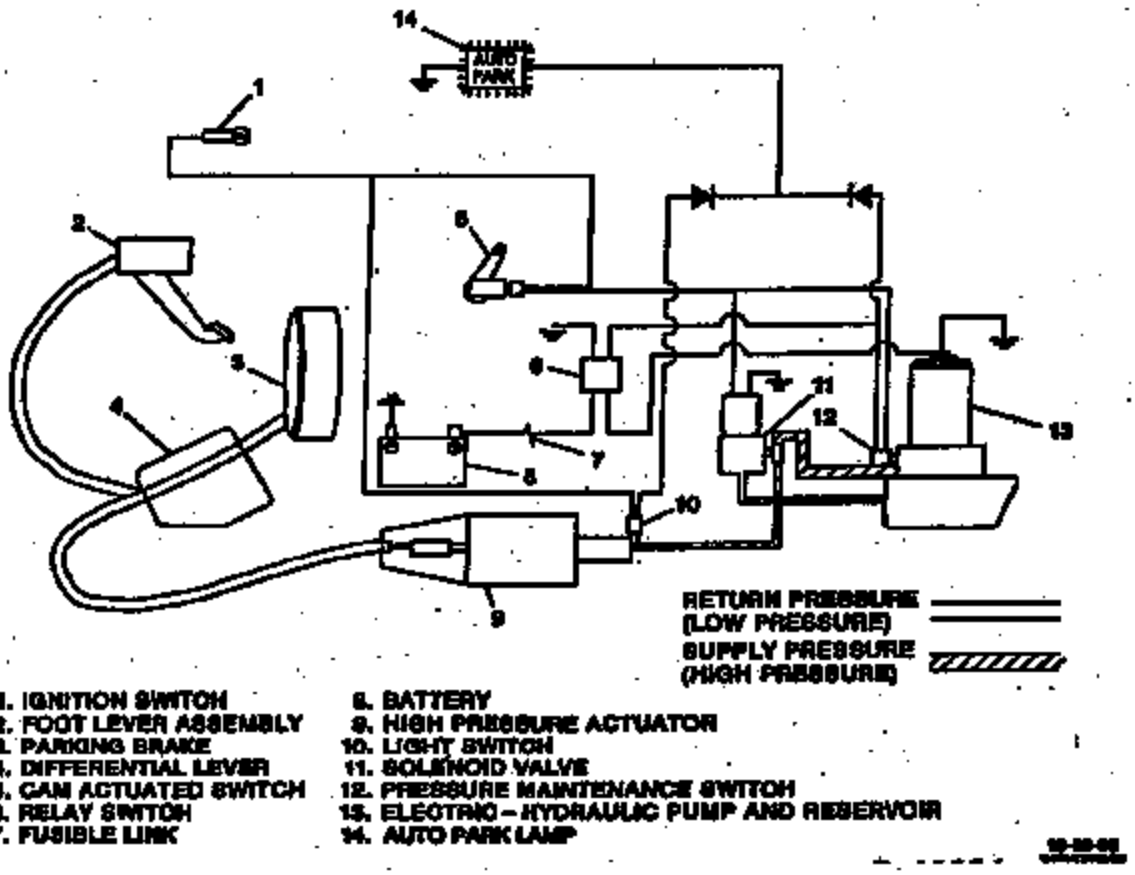


**Figure 6**

**Figure 6** is a schematic drawing of the Auto-Park system. This system is considerably more complicated that a traditional passenger car parking brake system and almost all other truck parking brake systems. As such, it also has many more critical components that require adjustment.

**Figure 7** shows a copy of a photo of the switch, which is operated by the cam that the gear shift lever controls.

**Figure 7**

As this switch controls both the solenoid operated hydraulic valve, that controls the pressure in the Auto-Park activator cylinder and the pump that supplies this pressure, any misadjustment of the cam or of the fore/aft position of the switch itself can cause malfunctions. Misadjustment of the switch or cam can cause either of two failure modes, the Auto-Park won't keep the vehicle from rolling or the Auto-Park could apply while the vehicle is being driven.

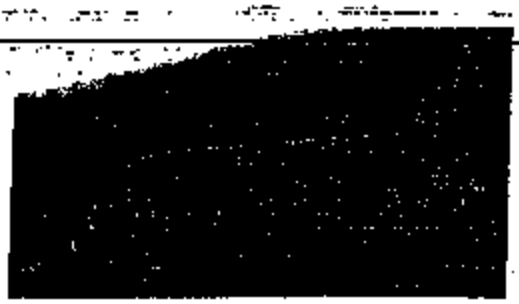

Figure 8

Figure 9

**Figures 8 and 9** depict areas where cable adjustments are necessary to assure the Auto-Brake shoes hold tightly against the Auto-Park brake drum. **Figure 8** depicts the adjustment area that is common to both the pre and post 1998 model year vehicles. If the operator of the vehicle correctly uses the Auto-Park, this adjustment should not require frequent adjustment. This is because, if the parking brake is only used when the vehicle is **not** moving, there should be no rotation of the Auto-Park drum against the Auto-Park brake shoes, as is normal with most other traditional brake systems, which do wear out and do require regular adjustment and shoe replacement. However, particularly in pre-1998 model year vehicles with the foot operated Auto-Park, many owners have reported using the Auto-Park system to slow their vehicles during travel down steep grades. This practice should not be used with the Auto-Park, as it will result in very rapid parking brake shoe wear, as the shoes are not designed for braking a moving vehicle, only to hold tightly against a stationary brake drum to prevent a vehicle from rolling while parked.

**Figure 9** depicts an area where cables can be adjusted on the pre-1998 model vehicles. This is necessary as the foot operated system pulls the same operating cable as the hydraulic operated system. Again, this should require very infrequent adjustment unless the Auto-Park system is applied when the vehicle is moving and causes excessive shoe wear.

It should be noted that parking brake shoe wear can occur, even if the operator does not apply the Auto-Park when moving. Should the electric switch which controls the hydraulic system or the hydraulic pump itself fail, the Auto-Park could self apply while the vehicle was at speed. This would cause extremely rapid wear of the parking brake shoes.

To summarize, any of the following could result in failure of the Auto-Park to hold or to self apply when the vehicle is moving:

1. The brake cable(s) being out of adjustment;

2. Failure of the hydraulic pump:

3. Any leakage of hydraulic fluid;

4. Any shorts or separated wires in the electrical system that controls the hydraulic valves, the hydraulic pump, or the low hydraulic pressure warning light;

5. Worn or misadjusted parking brake shoes;

6. Worn parking brake activator piston or spring;

7. Misadjusted gear shift cam or the switch it controls;

8. Corrosion of any electrical connections; or

9. Failure of the hydraulic valve.

During the course of this investigation, ODI inspected the vehicles of over 15 owners that had reported problems with the Auto-Park on their vehicles. In every instance, the problems were due to either worn parking brake shoes, the misadjustment of the cam activated hydraulic switch, or misadjustment of the parking brake cables.

During discussions with these owners, it became apparent that the owners did not understand how the Auto-Park worked, the precautions that should be heeded in its use, or how to determine when the system should be serviced and adjusted.

MANUFACTURER'S ACTIONS: After discussions between GM and ODI, GM decided to take actions to better inform owners of affected vehicles. On June 11, 2001, GM notified NHTSA of it's plans to send all owners of motorhomes with Auto-Park systems a Safety Advisory letter. The letters will be mailed the week of July 11, 2001. The letter explains a simple procedure the owner can use to check the Auto-Park system to see if it works properly or should be taken in for adjustment or repair. It also contains warnings to owners regarding abuse or misuse of the Auto-Park system and it's consequences. Finally, it contains tips on safe parking of the vehicle such that in the event the Auto-Park does not hold, the vehicle will not roll away.

REASON FOR CLOSING: This investigation determined that the Auto-Park system, when properly maintained and adjusted would safely hold a vehicle on a 30 degree grade, as required of school buses by FMVSS No.105. The examination of problem vehicles disclosed that the problems were solely related to improper adjustment of the systems or worn parking brake shoes. Such problems are usually considered to be owner responsibilities.

Based on the ability of a properly adjusted system to safely hold the vehicle when parked and the responsibility of owners for reported adjustment malfunctions identified during this investigation, a safety-related defect trend has not been identified at this time. In addition, GM has agreed to send a Safety Advisory letter to all owners. In light of these findings and GM's actions, further use of agency resources does not appear to be warranted. The closing of this investigation does not constitute a finding by NHTSA that no safety-related defect exists. The agency reserves the right to take further action on these models if warranted by the circumstances.

Scott B. York

SR York

Safety Defects Investigator

6/20/01

Date

I Concur:

Richard Boyd

Richard P Boyd

Chief, Medium & Heavy Duty Vehicle Division

6/21/01

Date

Kathleen DeMeter

K D

Director, Office of Defects Investigation

6/21/01

Date

July, 2001

Dear Chevrolet Customer:

As the owner of a Chevrolet 1995 through 1999 motor home chassis, your satisfaction with our product is of utmost concern to us.

We are contacting you to make you aware that General Motors has received reports of crashes that may be related to the maintenance of the auto-apply park brake on your vehicle. The park brake system requires routine maintenance as outlined in you owner's manual. If the park brake system is not periodically adjusted, it is possible that the park brake may not fully engage, allowing the vehicle to roll.

**What You Should Do:**

1. Inspect your vehicle and confirm that your auto-apply parking brake is correctly adjusted. If you suspect that your system needs adjustment, please contact your GM dealer for service. GM recommends that you inspect the adjustment of your park brake at least twice yearly and after long periods of storage. It is recommended that you perform the simple check of the park brake system stated in your owner's manual in the *Scheduled Maintenance Services* section. For your convenience we have provided it below:

   ***Caution***

   **When you are doing this check, your vehicle could begin to move. You or others could be injured and property could be damaged. Make sure that there is room in front of your vehicle in case it begins to roll. Be ready to apply the regular brake at once should the vehicle begin to move.**

   - Park on a fairly steep hill, with the vehicle facing downhill. Keeping your foot on the regular brake, set the parking brake.
   - To check the parking brake's holding ability: With the engine running and the transmission in NEUTRAL (N), slowly remove foot pressure from the regular brake pedal. Do this until the vehicle is held by the parking brake only.
   - If the vehicle does not hold under the above circumstance, see your dealer immediately for parking brake adjustment.

2. As an added precaution to help prevent your vehicle from rolling away, GM recommends that you avoid parking on steep grades whenever possible. If you must park on an incline, park your vehicle against a curb or berm if possible. If parking next to a curb, turn the vehicle wheels into the curb.

3. Do not use the park brake system to stop the vehicle while the vehicle is in motion. The park brake system is not intended to be used as a substitute for the regular brake system. Doing so can damage the park brake system.

If you have any questions regarding this matter, please contact the Chevrolet Customer Assistance Center at 1-800-222-1020. The deaf, hearing impaired, or speech impaired should call 1-800-833-2438 (utilizes Telecommunication Devices for the Deaf/Text Telephones, TDD/TTY).

Chevrolet Motor Division
General Motors Corporation

NVS-216

DEC 14 2004

The Honorable Allen Boyd
Member, U.S. House of Representatives
301 South Monroe Street, Suite 108
Tallahassee, FL 32301

NVS-216 mjj
Ref. # 10092570

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I hope this information is helpful. If you have any questions, please contact Mr. Ronald L. Medford, Senior Associate Administrator for Vehicle Safety, at (202) 366-1810.

Sincerely yours,

Original Signed By
Jeffrey W. Runge, M.D.

Enclosures

cc: Washington Office

NHTSA: NVS-210: Congressional Response
NVS-216: mjj x30576
DOT/I No. 2004-5275
NHTSA Control No. ES04-006433
ODI Control No. 10092570
Draft: mjj 10/06/04
Revised: mjj 11/10/04
Final: mec 11/22/04, mjj 12/07/04
cc:
I10, I20
NEC-110, NIA-110
NOA-010, NOA-02
NVS-010, NVS-200, NVS-216
Subject/Chron/Optical Disk/CRD
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