

**US Department of Transportation
National Highway Traffic Safety Administration
Office of Defects Investigation
NBA-10-01, 400 7th Street, SW,
Washington, DC 20590**

2015 MAR 23 14 25 46

Crossville, TN

March 22, 2005

10117503

Dear Sir or Madam:

The following is offered as the narrative to the attached complaint:

I am the third owner of a 1998 National RV Dolphin motor home (VIN # 3FCMWF53G36VA22908). Due to mobility problems caused by my disability, multiple sclerosis, I contracted with Creation RV Service to replace the original carpet and vinyl floor covering with 5/16" engineered wood flooring. Creation RV Service is owned and operated by Mr. Bill Dodson, who is an authorized service agent of National RV and has thirty years of experience working in the motor home industry.

Mr. Dodson called me on February 14, 2005, shortly after beginning work on my motor home expressing great concern for what he had found. Apparently the driver's & front passenger seats and safety belts were not anchored to any metal plates and the frame. Mr. Dodson told me he had never seen the situation before and he felt strongly that this situation was dangerous and he highly recommended strengthening the anchorages. The original anchorages for the front seats and safety belts was wooden 7/8"OSB (strand-board) with a very thin piece of sheet metal (28 gage?) and undercoating sprayed on it underneath the flooring. Additionally, the OSB board had been compressed over 1/2" from years of use and it wasn't clear if water intrusion had further weakened the OSB board. Mr. Dodson said he would contact National RV and find out what they would recommend and how much financial support they would provide to cover the repairs.

The repairs Mr. Dodson recommended to strengthen the anchorages included installation of 3/16" steel plates underneath each seat and covering the 7/8" OSB board with 1/2" of plywood before installing the 5/16" wooden flooring. I felt this solution was appropriate and authorized Mr. Dodson to proceed with repairs.

Mr. Dodson recommended that I call National RV Owner Services to reinforce the need to make repairs. Apparently, the National RV representative he was talking to couldn't decide how many hours worth of repair time they would reimburse. Mr. Dodson also had to E-mail photos of the problem area to National RV. I did call and E-mail National RV Owner Services communicating with Mr. Joey Randerow.

Not knowing what the anchorage standards are, I found those listed by USDOT, Federal Motor Carrier Safety Administration (FMCSA) on the internet. Under Regulation 571.209 Standard # 209; Seat Belt Assemblies states: "Reinforcing plates, or washers shall be made of metal at least 1.5 mm. thick and at least 2580 mm. in projected area" This standard seemed to back up both Mr. Dodson's recommendations and common sense.

When I did not hearing anything back from National RV, I called Mr. Randerow back. He told me that he wasn't handling my situation anymore and referred me to Daniel Escalera. I called Mr. Escalera.

Mr. Dodson
4/4/05

March 22, 2005

Mr. Escalera told me that National RV had no responsibility to correct the above referenced problem because: 1) the age of my motor home 2) I was the second or third owner and 3) National RV had manufactured my RV according to industry standards, including the California Department of Housing. I told Mr. Escalera that I didn't think HUD had any jurisdiction over motor home manufacturers. I also asked him, regardless of how old the motor home was or how many times it had been sold, does it make sense that four bolts fastened to 7/8" OSB would hold a 300 pound man and a 120 pound seat if I hit a tree? I think it is reasonable to believe that I would be thrown through the windshield with the seat and safety belt still attached to me. Mr. Escalera stated that as far as he and National RV were concerned, they had no responsibility and that was the end of it. I asked Mr. Escalera to send me a copy of his comments and for the telephone number of National RV general counsel's office. He said he would send his comments, but if I wanted the company general counsel's phone number, I would have to request it in writing via the National Headquarters. I told Mr. Escalera that I was going to file a complaint with the NHTSA. He invited me to do so, as if I would get as far as I did with National RV.

I have checked with HUD and found that I was correct; they have no jurisdiction over motor home manufacturers. Now I am filing the complaint to see if Mr. Escalera is correct. Will you sweep this under the carpet? Do I have to be thrown through the windshield and die before anything can be done? Have out-of-court settlements already covered up fatal accidents among the hundreds of other National RV owners driving similarly constructed motor homes?

According to Mr. Bradley Albrechtsen, President and CEO of National RV Holdings, Inc., on February 9, 2004 the Company has adopted a Company Code of Business Conduct and Ethics which albrup stated says:

" We will comply with the laws and regulations that apply to us and our
Business and will adhere at all times to the highest ethical standards.
We believe that there is no inconsistency between business integrity
and good corporate citizenship."

I applaud the administration of National RV for the forward thinking policy. Unfortunately, Mr. Escalera and other employees involved with my situation have not internalized National RV Holdings, Inc. Company Code of Business Conduct and Ethics. Maybe your agency working directly with the administration of National RV can resolve my concerns.

Sincerely,

[Redacted signature block]

cc: Mr. Bill Dodson, Creston RV
1(931) 707-8605

Mr. Bradley Albrechtsen, National RV Holdings, Inc.
1(951) 943-6007

March 22, 2005

PS Please send me a complete detailed copy of DOT, NHTSA, Safety Standards Part 571.210 Seat Belt Assembly Anchorage. I can only locate the generalized Scope and Purpose and Application sections online.



Office of Defects Investigation

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Complaints

Defect Investigations

Recalls

Service Bulletins

Navigate: ODI Home

Form Approved: O.M.B. No. 2127-0008

Help

Consumer > Defect Investigation > 7/1/07

Consumer Information

* Denotes required field

Title :	Mr.	Org. Name :	<input type="text"/>
First Name :*	<input type="text"/>	MI :	G
Last Name :*	<input type="text"/>		
Address 1 :*	<input type="text"/>		
Address 2 :	<input type="text"/>		
City :*	Crossville	Zip Code :*	<input type="text"/>
State :*	TENNESSEE	Country :	UNITED STATES
Daytime Phone :*	<input type="text"/>	Ext :	<input type="text"/>
Fax :	<input type="text"/>	Evening Phone :	<input type="text"/>
Email :	jandwolver@frontier.net		

There are occasions when NHTSA would like to provide automobile manufacturers with copies of questionnaires, including personally identifiable information (e.g. name, address, telephone number, etc.). Manufacturers, like NHTSA, use these questionnaires to identify safety-related defects, analyze alleged problems, and remedy safety defects. By providing manufacturers with questionnaires that contain personally identifiable information, manufacturers can contact owners to seek clarity, obtain additional details, and in some cases, inform the owners of actions being taken to rectify the problem.

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1-888-DASH-2-DOT
(1-888-327-4236)

TTY

» 1-800-424-9153 or
» 1-202-484-5238

If you would like to authorize NHTSA to release this questionnaire (including your personally identifiable information) to the manufacturer of your vehicle, please check the "YES" box. Your personally identifiable information will be used only for the purposes described above. If you do not wish to authorize such a release, please check the "NO" box and your personally identifiable information will not be released to the manufacturer.

See [Privacy Statement](#) below.

I hereby consent to the release of the personally identifiable information contained in this questionnaire to the manufacturer of my vehicle.

Yes

No

Yes

The Privacy Act of 1974 - 5 U.S.C. 552a, as amended: The Privacy Act of 1974 requires Federal agencies to protect an individual's right to privacy when they collect personally identifiable information. Specifically, the Act prevents the release of personally identifiable information without prior authorization. The information requested in this questionnaire is made pursuant to the authority vested under the National Traffic and Motor Vehicle Safety Act of 1966 and subsequent amendments. You are under no obligation to respond to this questionnaire. If you choose to respond, your response may be used to assist NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or statistical summary thereof, may be used in support of the agency's action. No names or other personally identifiable information will be disclosed without explicit authorization.

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