

STATE OF INDIANA
ATTORNEY GENERAL
STEVE CARTER

CL-101 89029-2753

APR 15 11 7: 41

April 16, 2007

(NHTSA) National Highway Traffic Safety Administra
400 7TH Street SW
Washington, DC 20590

Re: [REDACTED] AG File No. 07-CP-54619

Enclosed is a consumer complaint that our office received from the above-referenced consumer. Since it appears that your office may be in a better position to assist in this matter, we are referring it to your attention.

Indiana law requires that we request that you investigate this complaint and report to us upon your disposition of the complaint. Ind. Code § 4-6-9-4 (a) (6). The enclosed information and above-referenced request are submitted in accordance with the statute.

Thank you for your attention to this matter.

Sincerely,

Lisa Adkins

Lisa Adkins
Consumer Protection Division

Enclosure(s)



DIVISION OF CONSUMER PROTECTION
INDIANA GOVERNMENT CENTER SOUTH, FIFTH FLOOR
302 WEST WASHINGTON STREET • INDIANAPOLIS, IN 46204-2770
TELEPHONE (317) 232-6330 • (800) 382-5516

NM
4/25/07
CC



CONSUMER COMPLAINT FORM

Office of the Indiana Attorney General

MAR 30 2007

To prevent delay, please be sure to complete **both sides** of this form in full. Please print clearly on the **front** of the form. **DO NOT** include your Social Security Number on this form or in any accompanying documents.

ATTORNEY GENERAL OF INDIANA
CONSUMER PROTECTION

1. YOUR INFORMATION

☒ Mr. ☐ Mrs. ☐ Miss ☐ Ms. ☐ Dr.
Name [REDACTED]
Address [REDACTED]
City OMAHA State NE
ZIP [REDACTED] County [REDACTED]
Age ☐ 18-24 ☐ 25-34 ☐ 45-54 ☐ 55-64 ☒ 65+
Phone [REDACTED] Day [REDACTED] Evening [REDACTED]
E-mail () SAME

2. WHO IS YOUR COMPLAINT AGAINST?

Name/Firm KEYSTONE RV
Address 2642 HACKBERRY DR
City GOSHEN State IN
ZIP 46526 County [REDACTED]
Phone (574) 535 2100
E-mail [REDACTED]
Person you dealt with DENNIS ROACK

3. WHEN DID TRANSACTION/INCIDENT OCCUR?

Date _____ Time _____ ☐ AM ☐ PM

4. WHERE DID THE TRANSACTION/INCIDENT YOU ARE COMPLAINING ABOUT TAKE PLACE?

- ☐ At the firm's place of business
☐ My home
☐ Away from the firm's place of business (work, convention, etc.)
☐ Other _____
- ☐ By Mail
☐ By Internet/e-mail
☒ By telephone

5. WHAT WAS THE VERY FIRST CONTACT BETWEEN YOU AND THE FIRM? (Check box when applicable)

- ☒ I telephoned the firm
☐ I responded to a TV/radio ad
☐ A person came to my home
☐ I received information by e-mail
☐ I received information in the mail
- ☐ I went to the firm's place of business
☐ I received a telephone call from the firm
☐ I responded to an offer on the Internet
☐ I responded to a printed advertisement
☐ Other _____

6. DO YOU CONSENT TO DISCLOSING THE FOLLOWING TO THE PUBLIC?

The nature and status of your complaint and the name of the firm? ☐ Yes ☒ No
Your name? ☒ Yes ☐ No
Your phone number? ☒ Yes ☐ No

7. WHAT WAS THE TRANSACTION FOR?

- ☐ My business
☒ My family/household
☐ My farm

8. HOW DID YOU PAY?

- ☒ Cash ☐ Credit Card ☐ Medicaid ☐ Private Insurance
☐ Check ☐ Installment Loan ☐ Medicare ☐ Other _____

9. DID YOU SIGN ANY WRITTEN AGREEMENT? IF YES, PLEASE ATTACH A COPY OF THE AGREEMENT.

☐ Yes ☐ No

For Office Use Only:

Ind	Prac	PL	MO	NL	NJ	OA:	Inv.	Sec	File #
025	059								-CP-

US Dept Trans., NHTSA Auto Safety

10. HAVE YOU COMPLAINED TO THE BUSINESS? ☒ Yes ☐ No
When? EVERY YEAR SINCE Action taken? NONE
I OWE THE UNIT

11. WITH WHAT OTHER AGENCY HAVE YOU FILED THIS COMPLAINT?
When? BBB N. EAST IND. Action taken? _____

12. HAVE YOU CONTACTED A PRIVATE ATTORNEY? ☐ Yes ☒ No

13. HAVE YOU STARTED A COURT ACTION? IF YES, PLEASE ATTACH A COPY OF ALL COURT PAPERS. ☐ Yes ☒ No

14. HAVE YOU BEEN SUED OVER THIS ISSUE? IF YES, PLEASE ATTACH A COPY OF ALL COURT PAPERS. ☐ Yes ☒ No

15. DOLLAR AMOUNT ASSOCIATED WITH YOUR LOSS, IF ANY. \$ 3000.-

16. PLEASE DESCRIBE YOUR COMPLAINT IN DETAIL (ATTACH ADDITIONAL PAGES IF NECESSARY)
Please attach a copy of all papers involved (order blank, warranty, credit card receipt and statement, invoice, contract or written agreement, advertisement, cancelled check, correspondence and all other related documents). Please print clearly or type. DO NOT INCLUDE YOUR SOCIAL SECURITY NUMBER.
SEE ATTACHED
STATEMENT

17. HOW WOULD YOU LIKE YOUR COMPLAINT RESOLVED?
BY PAYING ME PART (\$2500.-) FOR THE REPAIRS

18. CONSENT AND CERTIFICATION
I certify that the information in this complaint is true and accurate to the best of my knowledge. I consent to the release of any information to the Consumer Protection Division relating to this complaint. I understand that I should not include my Social Security Number in any information submitted to the Consumer Protection Division. If I do provide my Social Security Number, I expressly consent to the disclosure of my Social Security Number in accordance with Indiana Code § 4-1-10-5(2).
 Date 03-28-2007

WHAT WILL HAPPEN NOW? WHAT ELSE SHOULD YOU DO?
The Consumer Protection Division will send a copy of your complaint to the respondent firm or licensed professional. This office cannot disclose your complaint against a licensed professional to the public unless this office files a disciplinary action against the licensed professional. This office represents the State of Indiana and is limited in the remedies it can pursue. You may be entitled to compensation or other rights that we cannot pursue for you. In addition to filing this complaint, you may want to consider contacting a private attorney or your local small claims court.

MAIL COMPLETED FORMS TO:
Attorney General Steve Carter
Consumer Protection Division
Government Center South, 5th floor
302 West Washington Street
Indianapolis, IN 46204
PH: 317-232-6330 • FAX: 317-233-4393
www.IndianaConsumer.com

To whom it may concern.

In 2001 I bought a Cougar 5th wheel camper made by Keystone R. V Company, from Leach Camper Sales in Council Bluffs, Iowa. We made the first trip out west, and noticed in Las Vegas, that one of the tires was going flat, I changed the tire, at this time I noticed that the second tire was wearing and had several pieces missing. I took the 2 tires to a tire shop, and replaced them with new ones. I blamed the heat for the problem and the damage. Cost was \$ 200.00

The following year on my way to Tucson, Az. While driving on the Interstate, I had another blowout, I inspected the other tires and again a second tire was wearing down to the thread, and I could see the steel cords. Those tires I replaced at the Air Base in Tucson. Again I did not suspected the problem could be caused by the camper it self, I blamed the heat again. I was told at the Garage, to keep an eye on the other two tires. About a month later I had to replace the other two tires due to wear. Again the cost was \$ 400.00

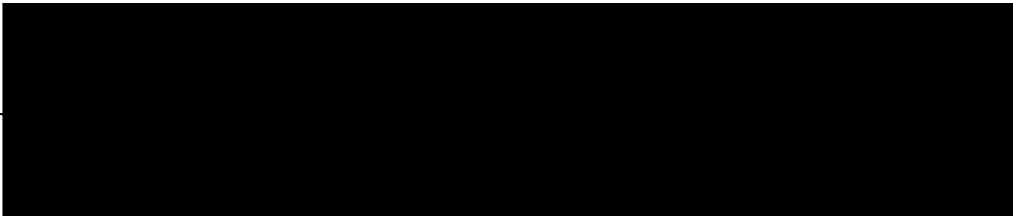
In 2005, while driving a loud explosion, I looked back and saw rubber was flying off my camper. I stopped and inspected the what was happen, again a tire had a blowout, and damaged the camper on the right side, it was a panel from the wheel to the back door. The cost to repair the above damage was \$ 600.00 for the panel, and another \$ 200.00 for the tires.

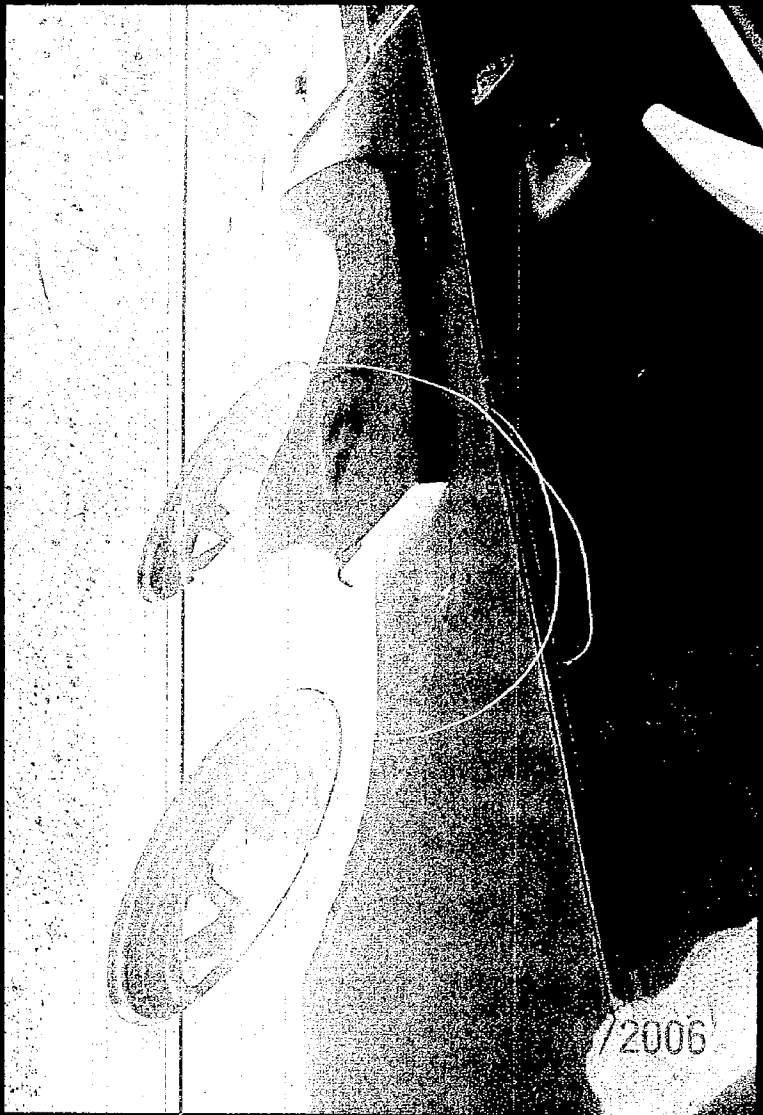
Last year 2006, I came back from Canada, and just crossed the border on my way to Mackinac, another blowout, and again the panel on the right side was damaged. After replacing the same, there was wear and the other tire, and again I had to replace 2 tires due to wear. This time I could change the tires in Ft. Benning, and was told something is wrong with your axle. I did completed my trip, and came back to Omaha, Ne. and drove to the dealership, and showed them my tires, at this time I was told again that the axle maybe out of alignment, and I may have problems in the future if it is not fixed. I took the camper to an alignment shop, and was told that I have to replace two tires for the alignment. The cost for the alignment was \$ 160.00 and \$ 400.00 for the tires I had to replace.

Every time I had problem with the tires, I called Keystone RV, and told them what happen, but always was told to call the Tire Company, but Keystone never would take any kind of responsibility. I talked several times to a Mr. Brandon about the tire problem, and also brought it to his attention that the tires maybe underrated for the unit. I drove 3 times over a scale on the Interstate system, and according to Mr. Brandon was not overweight. He told me that the Engineers of the company said the

tires are right the size for the unit. Than I was told that the tires probably where under-inflated, and it could be the problem. This is impossible, I told Mr Brandon, since I check my tire pressure every Monday. Than I was told, I was driving to fast with the unit, every possible excuse was used to get me to go away. Than when I called in, my name was not in the register, and after sending all the documentation in to prove my complaint, everything was lost, and I had to resubmit everything. After Keystone wrote to me that the Company would not pay, or take any part in this complaint. I called, and talked to a Supervisor, who again said we don't pay any claims, but told me again to call the company who make the axle, on his dime, and see if they would do anything for me. Again I was shoved off to another supplier to the Keystone Company, who told me we can not pay you since we don't know what happen. Than a new excuse came up, I was told I probably drove over curbs or hit potholes with the camper, with other words I was abusing the camper. The camper was an investment, and I would not abuse any of my vehicles, or do not perform the necessary maintenance, I was in the Military for 20 years in transportation, and know what to do to keep a vehicle in 100% shape.

I told one of the employees during my conversation with her, that I don't like to go to court, that I like to settle my problems direct with the manufacturer, and would settle for 75%(\$ 2500.00), but it seems that Keystone is not interested in friendly settlements.





[REDACTED]
[REDACTED]
Omaha, NE [REDACTED]
[REDACTED]



January 16, 2007

Hi Brandan;

Here is the info from the Maxxi Tire Co, on the tires from this year. Last year the same thing happen, and I was never told that those tires maybe overloaded, which is impossible, for the following reasons:

- 1 We never have any water in the holding tanks, or fresh water tanks
- 2 We always empty our Gray water tank before we leave the Campgrounds.
- 3 Every Monday I check my tires on the Camper and on the Truck, for right inflation.
- 4 I make it a point to go over the scale on the Interstate, at the beginning of our trips.

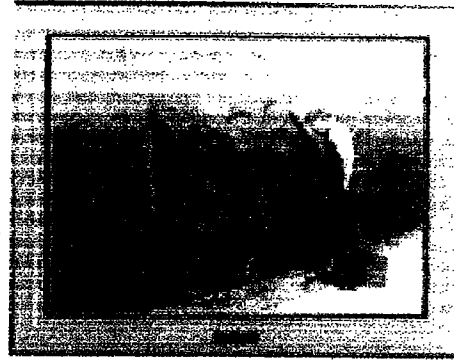
The last time I drove over the scale, the weight was 7800 lbs.

I strongly believe that the tires for this Model Camper (Cougar 2002 276) were underrated, and maybe the cause for the separation of the tires.

In the last 2 years I replaced all 5 tires on this unit, and every time it was tire separation. The Camper was bought new from Leach Camper Sales in Council Bluffs, Iowa, as a 2002 unit.

I strongly believe that a compensation from the Keystone Camper Company should be rendered.

[REDACTED]
[REDACTED]
Omaha, NE [REDACTED]
[REDACTED]



Omaha, 01.17.2007

Keystone RV
Goshen, In.

Dear Sir

In 2001 I bought a 2002 Cougar 5th Wheel Camper from Leach Camper Sales in Council Bluffs, Iowa. On a trip in 2003, we stayed in Bullhead City, Az. and I noticed the tire has gone flat. After taken off the tire and a closer inspection, I noticed that the second tire had pieces missing also. The tires where taken to tire repair shop, and 2 new tires purchased at the time. At the time I blamed the heat for the damage.

On 8.30.2004, again I had to replace two tires in Tucson, Az. Again I never suspected that it could have been due to mechanical problems with the unit. At this time I was warned. by an employee, to watch the other two tires. I still suspected the heat in Arizona, and Nevada was the cause for the blowouts. On 9.13. 2004 I had to replace the other two tires due to wear.

In 2005 tires on camper lost tread and again went flat(blowouts), and damaged the panel in front of the door of the camper. This was repaired back home in Omaha by Leach Campers.

The year 2006 started out very good, and I had new tires on the unit. Coming out of Canada, a loud explosion, I stopped the vehicle, and again tires had to be replaced, again the panel on the door needs replacing also. I called Leach to order the panel again. Later in a campground I checked the tires like I do every Monday, and another tire was wearing on the inside, and had to be taken off and replaced. In Fort Benning, Georgia I replaced the tires, again wear was shown.

Upon arrival back in Omaha, I went to a tire dealer, showed him the tires, and was told that the axle probably needs alignment, otherwise the problem would not go away. The alignment shop told me that I would have to replace two more tires, due to wear.

I have been checking the air pressure on a weekly base, and keep the air pressure at 50 PSI, according to manufacturers recommendation.

It cost me an extra \$ 2500- \$ 3000, for the time I bought the camper to the present. All those problems are not due to my driving, or anything I may done wrong, like over loading, over or under inflation of tires or driving to fast(60 mph). It seems that all those things happen because the axles did not align according to manufacturers specifications.

I did complaint once before to Keystone, but was never told that it was or could have been an error due to axle miss alignment.

I will send and include all the invoices from the tires, and the axle alignment.

I would appreciate any help in this case, to be a happy camper in the future.

[REDACTED]
[REDACTED]
Omaha, Ne. [REDACTED]



Keystone RV Company

Thursday, January 6, 2005

[REDACTED]
[REDACTED]

Omaha, NE [REDACTED]

Re: VIN: 4YDF276202 [REDACTED]

Dear [REDACTED],

Thank you for bringing the issue regarding your Cougar to our attention. Feedback such as yours is valuable to our company and, we can assure you, has not gone unheard. We have reviewed your letter, the information from Maxxis Tire, and notes in our computer system. The tires that we install on our units are adequate for the design of those units and within the RVIA specifications. As well, stated in the Keystone One Year Limited Warranty tires are not covered. We regret your inconvenience and apologize that we cannot offer assistance.

Again, we appreciate your comments.

Respectfully,

Brandon Tom
Owner Relations Representative

Cc: file

11/11/05

THE ATTACHMENTS TO THIS
DOCUMENT HAVE BEEN REMOVED
TO PROTECT UNWARRANTED
INVASION OF PERSONAL PRIVACY
PURSUANT TO EXEMPTION 6 OF
THE FREEDOM OF INFORMATION
ACT (FOIA), 5 U.S.C. 552(b)(6).