

CC-10318626-3614

2010 MAR -4 PM 3:24



[Redacted]
Warton, Ontario

[Redacted]

Mr Richard Boyd, Chief
Medium and Heavy Duty Vehicle Division.

Mr Dan Smith
Associate Administrator of Enforcement

Tom Bowman
Office of Defect Investigation.

February 23, 2010

via email and being mailed

Gentlemen,

I have read the response by Blue Bird to your requests to Defect Petition DP08-006 and herein list the errors, omissions, deception and deceit that I find in the reply.

Blue Bird response to NHTSA
<http://nhthqnwws111.odj.nhtsa.dot.gov/acms/docservlet/Artemis/Public/Pursuits/2009/DP/INRL-DP09006-39102P.pdf>

"Numerous steps to remedy the safety defect" ---- Not really factual as the defect is the undercapacity of the front axle. The true fix, which was initially offered was a replacement front axle.. As a cost saving measure , this new axle plan was scraped and the the reconfiguration of the coach was planned. Obviously the first attempts at the reconfiguration failed and two additional phases were implemented over a 24 month period.

In the response, Blue Bird says--"The remaining open issues on CERTAIN COACHES are items that do not effect the safe and normal operation or use of these vehicles"

---- but the remaining open issues DO effect the safe and normal operation of the REST of the coaches. The sentence was written with devious intent. Some coaches left after the first stage, overweight, without placards and with owners being told not take 4 passengers or much cargo. If there were not issues that had to be still addressed, Blue Bird would NOT have done them with phases 2 and 3.

1. in fact, it was the requested upgrade to 17,000 pounds that necessitated the tie rod exchange.
- b. The new tires were the same size, brand, load rating. Exactly the same, not increased capacity or strength as suggested.
- c. Front end alignment was required because many coaches left the factory without proper alignment. Nothing to do with the recall although it was required again after the tie rod exchange.
- e. Hadley changes were done to equalize the side to side loads on the front axle as the imbalance overloaded the tires. It was promoted as a method to lighten the loading on the front axle. Not true or possible. The changes to the system removed much of the automatic leveling features of the system as any automatic leveling would overload the front tires which have minimal reserve.
- h. auxiliary compressor. This was demanded by NHTSA. The proper solution would be the upgrade to 365 tires and rims as done by PREVOST.
- m. decals for under floor storage bay capacities. These decals are placed ambiguously . They are duplicated on the curb side and the road side of the same bay, giving the impression that the capacity is for each side when it is not. The numbers are calculated using the non standard 2 passengers and 1/4 water instead of the accepted CCC for these coaches of four passengers and full water. These bay decals are also the total limit for ABOVE and BELOW the floor. i.e. in the coach including fridge/freezer contents, pot,dishes and pantry.
- n. larger capacity coolant reservoir--- this was required as part of phase two because the initial design failed
- o larger capacity cooling fan--- Blue Bird had the owners return to exchange the fans and increase the ductwork in all of the previous relocations as the initial design overheated
improve access-- original gen set was on a slide out and this was not included in the relocation due to cost restraints. (all other RV's have slide outs in this location). These access doors were later added in phase two to try to appease owners.
- p. relocate generator power control box---Blue Bird had to move this in all the modified coaches as they overheated in the original designs
- q. remove steel generator support structure from the front generator compartment. This is part of stage three . A further attempt to lighten the front end as some of the coaches were still too heavy

ET
03/08/10
TRW

3b "increased load carrying capacity of the front tires to over 17,000 lbs. SAME tire -- no change. 5% drop in tire pressure from the maximum puts the tire in overloaded condition. TPMS alarms are 10% to 12.5%

3e The control unit that effects the drive:tag ratio was changed from 60:40 to 65:35 in order to lighten the load on the front axle. the original system had the ratio at 60:40, allowing the tag to go to its maximum of 13,000 pounds and thereafter any additional loading would then be taken by the drive axle. The change keeps the tag lighter (and therefore the front somewhat lighter) but puts more loading on the drive taking it over the DOT legal maximums with the coach unloaded.

3g. "(genset move) relocated approximately 1,200 lbs from the front of the coach" The genset weighs approx 900 pound total. The move to mid coach takes 450 pounds off the front axle.

"reduced approximately 37 cu ft"---- This is a number fudge

"45 of 51 coaches"---This is a convenient use of numbers at that particular time. Blue Bird was actively sealing these old genset locations in phase three after Dec 16th. On the coaches that had the space, there was a rating of 50 pounds or less and it was not watertight.

3k. "Owners manual addendum" -- Blue Bird has done a complete change in definitions and standards that were in the original manuals and on the placard above the dash in the coach. The definition of CCC "cargo carrying capacity" which stated cargo carrying capacity is that available AFTER full water and 4 passengers.

3m. again- placards in the bays are misleading-- not UNDERFLOOR only

The placards should be based on the accepted CCC definitions agreed to at the time of manufacture and sale, not with 1/4 water and 2 people.

3n. "Install larger capacity cooling reservoir" -Blue Bird had to return to the coaches to modify the relocation design as it overheated.

3m."Install larger capacity cooling fan" The design overheated. It took them almost a year to correct this design.

3p. Relocate generator power control box. The controls were failing from excessive heat. Part of owners return for phase two

3q Remove steel generator support. Part of phase three and on going as Blue Bird tries to reduce the front axle loading. There is a real possibility of decreased safety in removal of structure from the coach as there are no engineered drawings done. One coach has had over 2700 pounds removed in total.

4. compromises -- Under floor storage space volume is decreased much more significantly then these numbers given by Blue Bird. There were four, half bays available before the gen set relocation. The two additional half bays are used for the entertainment centre, bar-b q, and tools. The genset relocation and the auxiliary compressor has taken over 1.5 of these bays. Only on a few coaches, the old genset slide out area is available for 50 pounds of wet storage. Therefore over 1/3 of the available storage space has been lost.

A compromise tactfully omitted is that the Cargo Carrying Capacity has been reduced and that impractical and unreasonable loading restrictions have become mandatory when there were none originally.

Depending on the coach, Blue Bird may indicate a 3000 pound CCC. But the bay decals indicate 1000 pounds. Adding full water and 2 persons brings this down to 500 pounds. This is the weight allowed in the bays AND in the coach forward of the drive axle; pantry, galley etc. That is unreasonable and does not allow the intended use of such a vehicle.

The remaining 2000 pounds of CCC must be carried behind the drive wheels: in the bathroom or bedroom where the minimal cupboards are used for clothes, linens, blankets etc. There is a single drawer under the bed that holds 2 pillows and a blanket for the guest bed/couch.

6. "Describe the process that blue Bird followed when weighing..." "Process for weighing units was the same before and after recall work was done. Units were weighed with full fuel and 1/4 water." --- Simply not true. Blue Bird began weighing the coaches with full water and calculated using 4 passengers as was the standard that they had agreed to and had indicated so in all the coaches. I have my copies of weight and forms taken by Blue Bird which were with full water. When Blue Bird decided to drop the new axle remedy, they changed the weighing procedures to accommodate themselves and fictitiously make the numbers appear better.

I have earlier lodged an official complaint that Blue Bird knew of the overweight issue while they were manufacturing these units and that they ignored the safety issue. I have submitted proof. I have not had acknowledgement from NHTSA.

Blue Bird's attempts at this remedy is not a fix of the defective part/problem but is a alteration of the vehicle, destroying its functionality as an RV for both short or extended use.

Blue Bird's limited remedy was done strictly as a cost saving measure with the knowledge and hope that the relatively few owners would, and could not protest strongly.

I respectfully request that NHTSA regard this issue with the same conviction as similar issues involving many more vehicles. Safety rules, laws and ethics shouldn't be affected by numbers.

Sincerely,



