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Dublin, OH [REDACTED]

CL-11346095-1900

February 28, 2022

Via USPS Certified Mail Service

Ms. Anne Collins
Associate Administrator, Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: Exterior Lights Safety Recall, #11349065
18V582 (19V426), 20V404 (20V421)

Dear Ms. Collins,

I purchased a 2017 Newmar London Aire RV on a Freightliner chassis in August 2016. Early in 2017, I started experiencing tail lights, marker lights and other electrical component failures. This serious safety defect has continued persistently since, despite multiple recalls initiated through NHTSA.

In spring of 2017 while driving the coach in a rain storm and towing a car hauler, I realized all the lights on the trailer were completely off. These included all the trailer DOT and tail lights. Upon further inspection, I realized the tail lights and marker lights on the RV were out as well. All front lights and headlights were functional. The 4-way flashers were functional and I was able to reach destination. The next day, all lights functioned properly. Please note, without the trailer in tow, I would have had no way of realizing the tail lights failure on a 45' RV.

This intermittent defect continued for some time. Whilst the tail lights were functional, the Freightliner dealer was unable to determine any issues. On 08/28/2017 (17-08-28_RO_YoungTruck, Task 3, Pg1-2) I was finally able to showcase the failure to my home Freightliner dealer (Young Trucks, Canton, OH). I have known Young Trucks since 2001 and Brian, a very competent tech at Young Trucks has always worked on all my current and past motorcoaches.

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Brian in his initial contact with his Freightliner tech support had the issue diagnosed by FCCC tech as; **“Too much amp draw on the wire, causing the relay to shut down”**. This relay provides the power to the RV tail lights, marker lights, trailer/tow supply, dash AC and some dash components (ie rear camera functions). This diagnosis by FCCC's own tech support seemed to suggest potentially a wiring harness short causing 'too much amp draw', hence the relay in the Power Distribution Module (PDM) shutting down. This problem was resolved, once the RV/engine was shutdown for a period of time.

Once the issue relating to my RV was escalated for warranty work, the blame was shifted to my trailer, as the cause. According to Freightliner, the argument was, poor wiring on the trailer side, causing the short, hence, 'too much amp draw', resulting in the relay shutdown and the tail lights failure.

It took another failure when I was able to show the defect was with the RV and independent of the trailer in tow. At that point, Freightliner started to blame the body builder's (Newmar) final wiring to the tail lights (17-10-11_eMail_Young_Blame). Once again, Freightliner's argument was the final wiring by the body builder (Newmar) to supply the tail lights, causing the short. Hence too much amp draw and the relay in the PDM shutting down, causing the tail lights failure.

The issue was further evaluated by Newmar engineers and it was determined the source of the problem was within the Freightliner chassis. At this point Freightliner once again refused to take responsibility for the issue. I was advised through Young Trucks, I would be charged (and was charged on multiple occasions) to conduct any further testing and diagnose of their own safety defect. The tail lights failure continued through early 2018. By this time the failure had become consistent such that, after about thirty (30) minutes of the lights turned on, the failure would become evident. Again, once the engine was shutdown for some period of time, the tail lights would recover and function. Suggesting a relay reset would recover from the failure caused by too much amp draw.

In early 2018, I advised Newmar the problem had become terminal and ignoring this serious safety issue will likely cause an accident. Upon Newmar's initiative coercing Freightliner, I was advised, Young Trucks will work with me to review this defect (21-04-18_eMail_Young_ReviewLights).

Throughout the summer of 2018, while I was residing in Columbus Ohio, I made more than a hand full of trips to Young Trucks (Canton, Ohio), a 300 mile round trip, at my own expense and time to help Freightliner (Young Trucks) identify their defective tail lights issue. Recall 18V582 was the result of that. This recall for 12,311 Freightliner chassis with a 100% estimated defect stipulated an issue with the PDM. This was in contrast to the original diagnosis by Freightliner's own engineers.

This recall was applied to my RV on January 2019. This recall, however, did not resolve the issue. Once more, this serious safety defect was dragged on till September of 2020, when I was informed by Young Trucks of another recall (20V404). The recall was applied by Young Trucks on 09/24/2020.

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In spring of 2021, the defect was once again observed. Please note, RV's in general are not driven on daily basis like a personal car. In fact most are parked for months and/or over the winter, as was mine. So it is difficult for most owners to recognize this defect, furthermore some do not even drive at night.

I have raised this continued tail lights failure repeatedly with both Freightliner and Newmar to no avail. On 29/07/2021, I advised both Newmar/Daimler/Freightliner and Young Trucks about the continued failure of the tail lights issue. Following the above correspondence, I received email (21-08-03_eMail_Newmar_Verify) from Newmar stating Mr. Rostenbach (Litigation Administrator at Freightliner) claiming Young Trucks is working on this issue. This claim simply was not true.

The very next time the tail lights failed (9/10/2021), I drove the RV to Young Trucks for their observation/evaluation. Mr. Clay (Service Mgr) and Mr. Snyder (Shop foreman) observed the issue and took note of mileage, VIN number, and the failure of tail lights, Marker lights and the Dash AC in order to initiate a service repair order. However, since my visit, Young Truck is now refusing to acknowledge their observation of the tail lights and marker lights failure (21-09-15_eMail_Young_Denial). These statements are inconsistent with the facts and Mr. Rostenbach's claims to Newmar regarding the previous failure of this issue and Young Trucks work on this defect.

I have known Young Trucks for over twenty (20) years now. They have worked on all my other coaches which were built on Freightliner chassis, including other Newmar products beside the one I currently own. Young Trucks have always served me well and performed their work with complete competence and integrity. I can state with certainty, this statement from Young Trucks is entirely out of character of the people I have known and worked with for over twenty years. The lights failure was fully observed by Young Trucks personnel.

The tail lights defect is now increasingly becoming consistent in its failure. So far, in two occasions and within an hour of lights turned on, the failure has been observed. On 2/16/2022 while driving, the tail lights failure was observed. This failure was further observed by Stoops Freightliner dealer in Dayton Ohio (22-02-16_RO_Stoops). Stoops service did not contact Freightliner while I was there.

On the very initial contact (2017) by my tech Brian at Young Trucks, the Freightliner engineers seemed to suggest a potential issue with the wiring harness and not a PDM box failure. The two recalls to replace the PDM box have changed some of the characteristics of this failure. However, the recalls have failed to resolve this safety defect so far after more than four and a half years now.

Last, NHTSA just approved new Headlight Technology to improve safety. The Amish buggies, where this coach is built, have tail lights and even some headlights. Yet, this Newmar/Daimler/Freightliner high line luxury coach, which now sells for some \$800,000, drives in total darkness with no tail lights.

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Ms. Collins, with utmost respect for NHTSA and its accomplishments as well as essential motor vehicle safety regulatory services, I am asking NHTSA for a full investigation to ensure a final and complete resolution to this safety defect . As I understand it, NHTSA's mandate is to either respond to notification by manufacturer or respond to consumer complaints. The manufacturers in this case have so far failed to comply with the Vehicle Safety Standards.

As for the consumers, hundreds of complaints have been logged in just one Newmar owners Forum (iRv2) since 2019 (NewmarOwnerComplaints). These complaints started once the recall notice made the issue transparent. As to why these consumers are not filling more complaints with NHTSA, it is likely because they are under the impression this safety defect has been resolved.

RV's are not driven on daily basis. The owners of these RV's are typically older and/or retirees. They do not drive much. Some do not even drive at night. However, they do drive on the same public roads as any other vehicle. There is no justification for this safety defect to be repeatedly ignored year after year by the parties involved.

I implore NHTSA to recognize the tail lights failure in an RV is just as much a safety defect as it is in a regular passenger vehicle. If not more so, simply because most owners would simply not know they have this failure as it is impossible to know these tail lights have failed on a 40'-45' RV.

I look forward to hear from NHTSA. I am also available to further discuss this matter with anyone from your office. Thank you kindly for your considerations to the resolution of this safety defect.

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*Encl: CD contains referenced documents and videos

Via USPS Regular Mail

CC Mr. John O'Leary, Daimler Trucks North America President & CEO DTNA
Mr. Martin Daum, Member of the Board of Management of Daimler AG
Mr. David Carson, Senior Vice President, Sales & Marketing DTNA
Mr. Brian Fuchs, Customer Service Manager - Newmar
Mr. Jon Steinbring, Steinbring Motorcoach – Newmar Dealer
Mr. Craig Young, Young Trucks – Freightliner Dealer

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