

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jim Sheldon
President
Monaco Coach
606 Nelson Parkway
Wakarusa, IN 46573-0465

NSA-11 Intr
RQ99-014

Dear Mr. Sheldon:

This letter is to advise you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Recall Query, RQ99-014, of alleged trailer instability while being towed in 1995-1996 model year Holiday Rambler 31-foot Aluma-Lite trailers. On August 16, 1995, Holiday Rambler conducted a safety recall, 95V-154, of 783 1994-95 35-foot and 1995 31-foot Aluma-Lite trailers. These trailers have a fresh water tank and a storage compartment at the rear of the unit that can potentially be overloaded. As a result, these trailers can exhibit reduced stability while being towed. The remedy involved (1) placement of a label on the storage compartment at the rear of all travel trailer models indicating the maximum storage weight capacity, (2) relocating the fresh water tank from the rear of the travel trailer to an area above the suspension on the 1995 31CFS and 1994 35CSSO; and (3) installation of a Hensley Arrow hitch on the 1994 35CSSO and 1995 35WCS travel trailers. The 1995 31CFS did not receive a Hensley Arrow hitch in this safety recall. Holiday Rambler began owner notification on September 20, 1995.

ODI has received 2 consumer complaints alleging a crash due to instability of the trailer while being towed on model 1996 31CFS Aluma-Lite trailers. In the first consumer report, four injuries resulted from the crash. ODI is waiting for the second report which is being sent by the consumer's attorney. A copy of the ODI complaint is included for your review and assessment.

Unless otherwise stated in the text, the following definitions and instructions apply to this request for information:

- **Holiday Rambler:** Holiday Rambler Company, its parent Monaco Coach, and all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Holiday Rambler (including all business units and persons previously referred to), who are or, in or after 1995, were involved in any way with any of the following related to the alleged defect in the subject trailers:
 - (a) design, engineering, analysis, modification or production;
 - (b) testing, assessment or evaluation;
 - (c) consideration, or recognition of potential or actual defects, reporting record-keeping, (e.g., complaints, warranties, part sales), analysis, claims, or lawsuits; or
 - (d) communication to, from or for use by to zone representatives, fleets, dealers, or other field locations.

- **Subject trailers:** all 1995 and 1996 31CFS Holiday Rambler trailers.

- **Safety recall:** On August 16, 1995, Holiday Rambler conducted a safety recall, 95V-154, on 783 1994-95 35-foot and 1995 31-foot Aluma-Lite trailers. These trailers have a fresh water tank and a storage compartment at the rear of the unit that can potentially be overloaded. As a result, these trailers can exhibit reduced stability while being towed. The remedy involved (1) placement of a label on the storage compartment at the rear of all travel trailer models indicating the maximum storage weight capacity, (2) relocating the fresh water tank from the rear of the travel trailer to an area above the suspension on the 1995 31CFS and 1994 35CSSO; and (3) installation of a Hensley Arrow hitch on the 1994 35CSSO and 1995 35WCS travel trailers. Holiday Rambler began owner notification on September 20, 1995.

- **Alleged defect:** any improper installation, failure, malfunction, or other unsatisfactory performance of the trailer which results, or could result, in trailer instability.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all nonidentical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and

computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by you, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a nonidentical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Holiday Rambler or not. If a document is not in the English language, provide both the original document and an English translation of the document.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Please repeat the applicable request verbatim above each response. After Holiday Rambler's response to each request, identify the source of the information and indicate the last date the source updated the information prior to the preparation of the response. Insofar as Holiday Rambler has previously provided a document to ODI, Holiday Rambler may either produce it again, or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. Previously submitted complaints do not need to be provided. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the Information Request letter (including the subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

If Holiday Rambler cannot respond to any specific request or subpart thereof, please state the reason why it is unable to do so. If Holiday Rambler claims that any document or other information or material responsive to any of the following items need not be provided to NHTSA because it is privileged or the work product of an attorney, separately by information request number, for each document or other information or material, state the nature of that information or material and identify any document in which it is found by date, subject or title, name and position of the person from, and the person to whom it was sent, and the name and position of any other recipient. Holiday Rambler must also describe the basis for the claim, and explain why Holiday Rambler believes it applies.

1. State the total number of all 31-foot 1995 through 1996 Holiday Rambler trailers, sold in the

United States, by model, model year, and the type of trailer hitch.

2. Provide an engineering drawing or schematic and specifications of the factory recommended trailer hitch(s) for the subject trailers and the Hensley Arrow hitch.
3. Furnish the number and copies of all the following:
 - a. owner, consumer, and fleet reports or complaints pertaining to the alleged defect in the subject trailers; and
 - b. field reports, other reports and similar documents pertaining to the alleged defect in the subject trailers.

This would include, but not be limited to, complaints or information from all sources either received or authorized by Holiday Rambler, or of which Holiday Rambler is otherwise aware, including various fleets, consumer groups, government agencies, insurance companies, and other entities which would have provided such information to Holiday Rambler.

4. Furnish the number and copies of all reports related to each of the following:
 - a. crashes and injury incidents;
 - b. subrogation claims;
 - c. third-party arbitration proceedings (where Holiday Rambler is a party to the arbitration); and
 - d. lawsuits, both pending and closed, in which Holiday Rambler is or was a defendant (or codefendant), or of which Holiday Rambler is otherwise aware.

This includes all those which have occurred or may have occurred, due to circumstances, conditions, or problems caused by the alleged defect in the subject trailers. Provide a brief synopsis of each case including Holiday Rambler's analysis of the alleged incident, a description of any injuries and property damage involved, the identification of the trailer (model, model year, and VIN), and the trailer owner (name and address). Identify all parties involved in each lawsuit and arbitration proceeding, including the caption, court, docket number, filing date, nature of the claim(s) as related to the alleged defect and the final disposition, if any. Furnish a copy of all police reports, documents by or for insurance companies and their agents and contractors, and all other documents related to a crash, injury incident, or fire.

5. Furnish a summary incident table of all known or reported incidents pertaining to the alleged defect in the subject trailers, identifying the owner's name, model, model year, type of trailer hitch, and VIN of the trailer, the trailer build date, the date of the incident (the date of the report if the incident date is unknown), the state or territory of the U.S. in which the trailer was registered at the time of the incident, and a brief description of any injuries associated with the incident. The table should be arranged in ascending alphabetical order according to the trailer owner's (private or commercial) last name. If Holiday Rambler has developed or

is developing a similar table which contains additional information, please include that additional information in Holiday Rambler's response. Also, provide a copy of the table Lotus or Excel format.

6. State the total number of (a) warranty claims, including extended warranty claims, and (b) requests for "good will," field, zone, or similar adjustments received by Holiday Rambler that relate, or could relate, to the alleged defect in the subject trailers by make, model, model year, model series code, calendar month and year, and problem claim code. Each problem claim code must be identified.
7. Furnish a copy of each service, warranty, or technical document(s) Holiday Rambler has prepared, including (but not limited to), bulletins, advisories, informational documents, training documents, brochures, or other communications, that were sent to any dealers, regional or zone offices, or field offices, or were sent to any such entities or offices, related to the following:
 - a. the alleged defect in the subject trailers; or
 - b. a similar potential defect in other Holiday Rambler trailers with the same, or substantially the same, trailer hitch as the subject trailers.
8. From the start of production of the subject trailers, identify and describe each and every modification or change made by, on behalf of, or known to Holiday Rambler in the design, material composition, supplier, manufacture, testing, quality control, or installation of the trailer, and all components thereof, originally installed, or which can be installed, in the subject trailers that affects the trailer's weight, load distribution and/or stability. The following information must be included for each modification or change:
 - a. the date on which the modification or change was incorporated into production;
 - b. a description of the modification or change;
 - c. the reason for the modification or change;
 - d. the part numbers of the original, and of the modified or changed components;
 - e. the disposition of the unmodified/unchanged components in Holiday Rambler production inventory, Holiday Rambler distribution and dealer stock, and the supplier's inventory, furnishing the date(s) if such components were removed or withdrawn from sale or inventory; and
 - f. state whether the modified or changed components could be interchanged with earlier production components.
9. Provide copies of all documents relating in any way to meetings, discussions, correspondence, or similar communications between Holiday Rambler and all other manufacturers, suppliers, outside contractors, consultants, investigators, and similar entities that pertain in any way to the alleged defect in the subject trailers from September 1994. This would include all documents that pertain to the subject component design, manufacture, performance, durability, quality, testing, or modification.

10. Identify separately each and every study, simulation, evaluation, analysis, inquiry, test program, survey, investigation, or similar action pertaining to the alleged defect conducted by or for Holiday Rambler or under its control, including when it was performed, by whom, the methodology, and the results. Provide a copy of each and every document relating to any such study, simulation, evaluation, analysis, inquiry, test program, survey, investigation, or similar action regardless of whether the documents are in interim, draft, or final form. For all uncompleted or planned activities, provide (a) a description of the action (including the objective and procedures); (b) the date it was, or will be, initiated; (c) a detailed schedule for the work to be done; and (d) the expected completion date.
11. Furnish Holiday Rambler's opinion of the alleged defect in the subject trailers. Please include an assessment of the following:
 - a. the causal or contributory factors which may result in the alleged defect;
 - b. the failure mode;
 - c. the risk to motor trailer safety that it poses;
 - d. the 2 reports included with this inquiry; and
 - f. Holiday Rambler's rationale for not installing a Hensley Arrow hitch or one with better stability control on 1995-1996 31CFS trailers.

This letter is being sent to Holiday Rambler pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to make reports to NHTSA. Holiday Rambler's failure to respond promptly and fully to this letter could subject Holiday Rambler to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. Other remedies and sanctions are available as well.

Holiday Rambler's response to this letter, in duplicate, must be submitted to this office by August 18, 1999. Please include in Holiday Rambler's response the identification codes referenced on page one of this letter. If Holiday Rambler finds that it is unable to provide all of the information requested within the time allotted, Holiday Rambler must request an extension from me at (202) 366-5226 no later than five business days before the response due date. If Holiday Rambler is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Holiday Rambler then has available, even if Holiday Rambler has received an extension.

If Holiday Rambler considers any portion of its response to be confidential information, 49 CFR Part 512, "Confidential Business Information," requires that Holiday Rambler submit two copies of those document(s) containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted, to the Office of Chief Counsel, National Highway Traffic Safety Administration, Room 5219 (NCC-30), 400 Seventh Street, SW, Washington, D.C. 20590. In addition, Holiday Rambler must provide supporting information for the request for confidential treatment in accordance with part 512.4(b) and (e) and include the name, address, and telephone number of a

representative to receive a response from the Chief Counsel.

If you have any technical questions concerning this matter, please call Mr. Nha Nguyen of my staff at (202) 366-6280 or by fax at (202) 366-7882.

Sincerely,

Jonathan D. White, Chief
Recall Analysis Division
Office of Defects Investigation

Enclosures: 1 ODI complaint

NHTSA:ODI:NSA

NSA-11:JWhite:kjs:65226: June 23, 2004

cc: NSA-11 subj/chron

I:\RIP\RQ\1999\RQ99-014-Holiday rambler-IR.wpd

DOT Auto Safety Hotline
Vehicle Owner's Questionnaire
 TO REPORT VEHICLE SAFETY DEFECT
 1-800-4-A-SAFETY
 (1-800-427-4649)
 INTERNET: www.nhtsa.dot.gov

FOR REP OF LIME ONLY

OWNER INFORMATION (Type or Print)

Name: [Redacted]
 Address: [Redacted]
 City: Hollywood State: FL Zip: [Redacted]
 Telephone: [Redacted]

Year Reported: [Redacted]
 Mileage: [Redacted]
 Reference No.: [Redacted]

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES NO
 In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

Signature of Owner: [Redacted] Date: 5/14/99

PRODUCT INFORMATION

Model Name: Holiday Rambler Year: 96
 Make: Alfa Romeo Model: Alfa-Lite
 Production Date: July 1995 Plant: Alfa Romeo
 VIN: 1A8181K20TW (Last 8 digits)
 Transmission: Automatic Drive: Front
 Manual Air Bag Month: May
 Abs Side Air 2-Pin Lock 3-Pin Lock

FAILED COMPONENTS/PARTS INFORMATION

Part Name(s): [Redacted] Location: Left Right Front Rear

TO BE COMPLETED WHEN REPORTING A TIRE FAILURE

Make of Tire: [Redacted] Size: [Redacted] Condition: Good Poor

APPLICABLE INCIDENT INFORMATION
 (Please describe in detail the incident(s), failure(s), observation, and injury(ies). Attach photos, if available.)

Date: Yes No
 Number of Failures Reported to Manufacturer: 4
 Reported in Manufacturer's: Yes No

Number, Description of Failures, Observations, and Injuries:

On 11/19/98 while travelling on I-95 towing a 3000 lbs Alfa Romeo trailer, the trailer lost stability and caused both the trailer and towing vehicle to roll over. This resulted in multiple injuries to the occupants.

The Privacy Act of 1974 - Public Law 93-502. The information is requested pursuant to authority vested in one Nation's Highway Traffic Safety Act and is intended to help identify safety defects. Your response is voluntary. Your answers may be used to identify the NHTSA in determining whether a safety defect exists and to conduct a safety recall. If you identify a safety defect or a manufacturer's recall, your response, or a statistical summary thereof, may be used in support of the agency's action.