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February 23, 2004

VIA FEDERAL EXPRESS

Mr. Richard Boyd, Chief
Medium and Heavy Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Re: NSA-214LLO
PE03-053

Dear Mr. Boyd:

The undersigned represents Triumph Motorcycles, Ltd. and Triumph Motorcycles America, Ltd. ("Triumph"). In response to NHTSA's request for information dated November 21, 2003 as identified above, attached please find Triumph's complete responses to NHTSA's inquiry. Each item and its response are attached as a separate document. Triumph has attempted to respond to each item as completely as possible and in the format requested.

Triumph is requesting confidentiality for Items 1, 2, 3, 4, 5, 6, 7, 8, 9, 11 and 12 due to the confidential and proprietary nature of such data. Pursuant to 49 CFR Part 512 we have submitted our request for confidentiality to the Office of Chief Counsel. The relevant confidential portions of our responses to Items 1, 2, 3, 4, 5, 6, 7, 8, 9, 11 and 12 have been deleted from this response until ruled upon by the Office of Chief Counsel.

INVESTIGATION
OFFICE OF DEFECTS

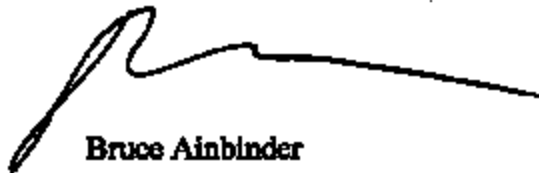
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Please do not hesitate to contact the undersigned if you have any questions.

Very truly yours,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

A handwritten signature in black ink, appearing to be 'Bruce Ainbinder', with a long horizontal flourish extending to the right.

Bruce Ainbinder

Enclosures

1. State, by model and model year, the number of subject vehicles Triumph has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Triumph, state the following:
 - a. Vehicle identification number (VIN);
 - b. Sprint (all models), Daytona (all models);
 - c. Date of manufacture;
 - d. Date warranty coverage commenced; and
 - e. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

REQUEST FOR CONFIDENTIALITY

2. State the number of each of the following, received by Triumph, or of which Triumph is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
- a. Consumer complaints;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - d. Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - e. Property damage claims; and

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- f. Third-party arbitration proceedings where Triumph is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Triumph is or was a defendant or codefendant.

For subjects "a" through "e" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "f" through "g" provide a summary description of the alleged problem and causal and contributing factors and Triumph's assessment of the problem, with a summary of the significant underlying facts and evidence. For items f and g, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

REQUEST FOR CONFIDENTIALITY

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
- a. Triumph's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether a fire is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

REQUEST FOR CONFIDENTIALITY

4. Produce copies of all documents related to each item within the scope of Request No. 3.
Organize the documents separately by category (i.e., consumer complaints, field reports, etc.)
and describe the method Triumph used for organizing the documents.

REQUEST FOR CONFIDENTIALITY

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Triumph to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and

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reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Triumph's claim number;
- b. Vehicle owner and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Comment stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure I, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

REQUEST FOR CONFIDENTIALITY

6. Describe in detail the search criteria used by Triumph to identify the claims identified in response to Request No. 3, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Triumph on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect that Triumph offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

REQUEST FOR CONFIDENTIALITY

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Triumph has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Triumph is planning to issue within the next 120 days.

REQUEST FOR CONFIDENTIALITY

8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Triumph. For each such action, provide the following information:
- a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

REQUEST FOR CONFIDENTIALITY

9. Describe all modifications or changes made by, or on behalf of, Triumph in the design, material composition, manufacture, quality control, supply, or installation of the quick disconnect fuel line fittings, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part number (service and engineering) of the original component;
 - e. The part number (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Triumph is aware of which may be incorporated into vehicle production within the next 120 days.

REQUEST FOR CONFIDENTIALITY

16. Produce one of each of the following:

- a. Example samples of each design version of the subject component;
- b. Field return samples of the subject component exhibiting the subject failure mode; and
- c. Any kits that have been released, or developed, by Triumph for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

16. Provide one of each of the following:

a. Exemplar sample of each design version of the subject component.

b. Field return samples of the subject component exhibiting the subject failure mode only.

c. Any kits that have been submitted, or developed, by Triumph for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

			A	B	C
PLCD2201-04	10MM FIR TREE CONNECTOR	YES	1	YES	2
PLCD2201-05V	8MM FIR TREE CONNECTOR	NO	N/A	NO	N/A
1240042 Issue 2	10MM BEADED CONNECTOR ROUND	YES	3	NO	N/A
1240042 Issue 4	10MM BEADED CONNECTOR SQUARE	NO	N/A	YES	4
1240048 Issue 2	8MM BEADED CONNECTOR	YES	5	YES	5
1240048 Issue 3	8MM BEADED CONNECTOR 0.5 RAD IN GROOVE	YES	7	NO	N/A
1240048 Issue 2	10MM BEADED CONNECTOR	YES	8	YES	9
1240048 Issue 3	10MM BEADED CONNECTOR 0.5 RAD IN GROOVE	YES	10	NO	N/A
1240053 Issue 1	10MM BEADED CONNECTOR	YES	11	YES	12
1240053 Issue 2	10MM BEADED CONNECTOR 0.5 RAD IN GROOVE	YES	13	NO	N/A
1240054 Issue 1	8MM BEADED CONNECTOR	YES	14	NO	N/A
1240054 Issue 2	8MM BEADED CONNECTOR 0.5 RAD IN GROOVE	YES	15	NO	N/A
1241170	SPARES KIT, CPC 10MM RED	N/A	N/A	N/A	N/A
1241175	SPARES KIT, CPC 10MM WHITE	N/A	N/A	N/A	N/A
1241180	SPARES KIT, CPC 8MM RED	N/A	N/A	N/A	N/A
1241185	SPARES KIT, CPC 8MM WHITE	N/A	N/A	N/A	N/A
1242225	SPARES KIT, CPC 10MM RED (LW)	N/A	N/A	N/A	N/A
				YES	10
				YES	17
				YES	18
				YES	19
				YES	20

11. State the number of each of the following that Triumph has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):
- a. Subject component; and
 - b. Modified component (if applicable); and
 - c. Any kits that have been released, or developed, by Triumph for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Triumph is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

REQUEST FOR CONFIDENTIALITY

12. Furnish Takachi's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator would have that the alleged defect was occurring; and
- f. The reports included with this inquiry.

REQUEST FOR CONFIDENTIALITY