



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

JUL 23 2004

Mr. Walter L. Bennett  
Secretary Treasurer  
Thor Industries, Inc.  
P. O. Box 629  
Jackson Center, Ohio 45334

NVS-214gth  
PE04-051

Dear Mr. Bennett,

During the past several months, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) conducted two Engineering Analyses, EA04-009 and EA04-019, to address unintended wheel separations that have occurred in travel trailers and fifth wheel towable recreational vehicles manufactured by Fleetwood Enterprises and Jayco, Inc. respectively. Both of these companies are in the process of conducting Safety Recalls to address this issue.

ODI's investigation of the wheel separation events that have occurred in Fleetwood and Jayco vehicles indicates that Thor Industries, Inc. ("Thor") has assembled towable vehicles using wheel end components similar to those that have resulted in unintended wheel separations. Accordingly, ODI is conducting this Preliminary Evaluation to determine Thor's field experience, if any, with unintended wheel loosening and separation.

ODI's request pertains to all towable products manufactured by Thor Industries, Inc., including but not limited to products manufactured by "Keystone R.V.," "General Coach Division," "Airstream," "Thor Industries," "Komfort," and all other divisions and/or product lines within Thor Industries, Inc. that assemble towable vehicles.

Although ODI's investigation focuses on the wheel mounting and retention system (hubs, wheels, studs, and nuts), this inquiry is intended to identify all wheel separation events that have occurred in vehicles manufactured by Thor, regardless of the suspected cause.

In order for my staff to evaluate this issue, certain information is requested.



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888-DASH-2-DOT  
888-327-4238

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** all Travel Trailer, Fifth Wheel, commercial and any other towable vehicles manufactured by Thor Industries, Inc. since January 1, 2000 and sold or leased in the United States.
- **Subject components:** the wheels, brake drums or brake rotors, hubs, wheel mounting studs, and/or wheel mounting nuts installed in the subject vehicles.
- **Thor Industries, Inc. ("Thor"):** 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 to a consultant) by or under the control of Thor (including all business units and persons previously referred to), who are or, in or after 2000 were involved in any way with any of the following related to the alleged defect in the subject vehicles:
  - a. Design, engineering, analysis, modification or production (e.g. quality control);
  - b. Testing, assessment or evaluation;
  - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
  - d. Communication to, from, or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect:** unintended loosening or separation of the wheels
- **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 non-identical 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 Thor , 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 non-identical 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 the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

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. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and 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.

Please repeat the applicable request verbatim above each response.

After Thor's response to each request, identify the source of the information and indicate the last date the information was gathered.

To the extent possible, ODI requests that Thor provide the requested information in Microsoft Access 2000 electronic format. The following table provides a summary of information for which Thor's response is requested in the Microsoft Access 2000 format.

Subject	Vehicles with Aluminum Wheels	Vehicles with Steel Wheels
Production Information	Request 1	Request 7
Complaint Information	Request 3	Request 9
Warranty Information	Request 5	Request 11

Thor should not consolidate the information from its various responding divisions. Thor should submit the requested information from each reporting division separately so that Thor and ODI can analyze the requested data as separate data sets.

## VEHICLES EQUIPPED WITH ALUMINUM WHEELS -

### POPULATION INFORMATION – Vehicles Equipped with Aluminum Wheels

1. Identify by vehicle type (e.g. Travel Trailer, Fifth Wheel, commercial trailer vehicle, etc), by model, by model year, and by manufacturing location, the number of subject vehicles equipped with aluminum wheels that Thor has manufactured for sale or lease in the United States since January 1, 2000.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER 1 – (Thor Division Name Here), PRODUCTION OF VEHICLES WITH ALUMINUM WHEELS." See the enclosed Data Collection Disc for a pre-formatted table that provides further details regarding this submission.

### COMPLAINT INFORMATION – Vehicles Equipped With Aluminum Wheels

2. State the number of each of the following, received by Thor, or of which Thor is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a) Consumer complaints, including those from fleet operators;
- 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 Thor involving a death or injury, notices received by Thor 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;
- f) Third-party arbitration proceedings where Thor is or was a party to the arbitration; and,
- g) Lawsuits, both pending and closed, in which Thor is or was a defendant or codefendant.

For subparts "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 "c" through "g," provide a summary description of the alleged problem and causal and contributing factors and Thor'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.

3. Separately, for each item (complaint, report, claim, notice, or matter) identified in response to Request No. 2 above, state the following information:
  - a) Thor'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 or fleet name (and fleet contact person), address, 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 property damage is alleged;
- k) Number of alleged injuries, if any; and
- l) Number of alleged fatalities, if any.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER 3, (Thor Division Name Here), COMPLAINT INFORMATION, VEHICLES WITH ALUMINUM WHEELS." See the enclosed Data Collection Disc for a pre-formatted table that provides further details regarding this submission.

- 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 Thor used for organizing the documents.

#### WARRANTY INFORMATION – Vehicles Equipped With Aluminum Wheels

- 5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Thor 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 reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

ODI requests that Thor include reports of wheel loosening or separations that have occurred prior to sale (e.g. during transit from the manufacturing facility to the selling dealer's location) be identified as such and included in the response to Request Number 5.

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

- a) Thor's claim number;
- b) Vehicle owner or fleet name (and fleet contact person) 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) Concern stated by customer; and
- k) Comment, if any, by dealer/technician relating to claim and/or repair.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER 5 – (Thor Division Name Here), WARRANTY INFORMATION FOR VEHICLES WITH ALUMINUM WHEELS." See the enclosed Data Collection Disc for a pre-formatted table that provides further details regarding this submission.

6. Describe in detail the search criteria used by Thor to identify the claims identified in response to Request No. 5, 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.

Describe any extended warranty coverage option(s) related to the alleged defect that Thor offered for the subject vehicles and state by vehicle type, model, and model year, the number of vehicles that are covered under each such extended warranty.

## **VEHICLES EQUIPPED WITH STEEL WHEELS -**

### **POPULATION INFORMATION – Vehicles Equipped with Steel Wheels**

7. Identify by vehicle type (e.g. Travel Trailer, Fifth Wheel, commercial trailer vehicles, etc), by model, model year, and manufacturing location, the number of subject vehicles equipped with steel wheels that Thor has manufactured for sale or lease in the United States since January 1, 2000.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER 7 – (Thor Division Name Here), PRODUCTION DATA FOR VEHICLES WITH STEEL WHEELS." See the enclosed Data Collection Disc for a pre-formatted table that provides further details regarding this submission.

**COMPLAINT INFORMATION – Vehicles Equipped With Steel Wheels**

8. State the number of each of the following, received by Thor, or of which Thor is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
- a) Consumer complaints, including those from fleet operators;
  - 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 Thor RV involving a death or injury, notices received by Thor RV 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;
  - f) Third-party arbitration proceedings where Thor RV is or was a party to the arbitration; and,
  - g) Lawsuits, both pending and closed, in which Thor RV is or was a defendant or codefendant.

For subparts "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 "c" through "g," provide a summary description of the alleged problem and causal and contributing factors and Thor RV'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.

9. Separately, for each item (complaint, report, claim, notice, or matter) identified in response to Request No. 8 above, state the following information:
- a) Thor's file number or other identifier used;
  - b) The category of the item, as identified in Request No. 1 (i.e., consumer complaint, field report, etc.);
  - c) Vehicle owner or fleet name (and fleet contact person), address, 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 property damage is alleged;
  - k) Number of alleged injuries, if any; and
  - l) Number of alleged fatalities, if any.

Provides the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER 9, (Thor Division Name Here), COMPLAINT INFORMATION, VEHICLES WITH STEEL WHEELS." See Enclosure, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

10. Produce copies of all documents related to each item within the scope of Request No. 9. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Thor used for organizing the documents.

#### WARRANTY INFORMATION – Vehicles Equipped With Steel Wheels

11. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Thor 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 reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

ODI requests that Thor include reports of wheel loosening or separations that have occurred prior to sale (e.g. during transit from the manufacturing facility

to the selling dealer's location) be identified as such and included in the response to Request Number 11.

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

- a) Thor's claim number;
- b) Vehicle owner or fleet name (and fleet contact person) 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) Concern stated by customer; and
- k) Comment, if any, by dealer/technician relating to claim and/or repair.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER 11 - (Thor Division Name Here), WARRANTY INFORMATION FOR VEHICLES WITH STEEL WHEELS." See the enclosed Data Collection Disc for a pre-formatted table that provides further details regarding this submission.

12. Describe in detail the search criteria used by Thor to identify the claims identified in response to Request No. 11, 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.

Describe any extended warranty coverage option(s) related to the alleged defect that Thor 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.

This letter is being sent to Thor 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 request reports and the production of things. It constitutes a new request for information. Thor's failure to respond promptly and fully to this letter could subject Thor 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.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond to ODI information requests.

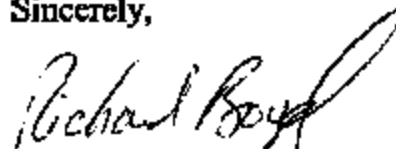
If Thor cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Thor does not submit one or more requested documents or items of information in response to this information request, Thor must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Thor's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **August 31, 2004**. Please refer to **PE04-051** in Thor's response to this letter. If Thor finds that it is unable to provide all of the information requested within the time allotted, Thor must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Thor 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 Thor then has available, even if an extension has been granted.

If Thor claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Thor must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Thor is required to submit two copies of the documents 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.

If you have any technical questions concerning this matter, please call Mr. Tom Bowman of my staff at (202) 366-6961.

Sincerely,

A handwritten signature in cursive script that reads "Richard Boyd". The signature is written in black ink and is positioned above the printed name.

Richard Boyd, Chief  
Medium and Heavy Duty Vehicle Division  
Office of Defects Investigation

Enclosure 1, one CD ROM titled Data Collection Disc