



U.S. Department
of Transportation

National Highway
Traffic Safety
Administration

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

OCT 1 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles Zucker
Technical Service Coordinator
Monaco Coach Corporation
1809 West Hively Avenue
P.O. Box 4313
Elkhart, IN 46514

NSA-14sjm
PE04-068

Dear Mr. Zucker:

This is to advise you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation, (PE04-068) concerning allegations that the LP gas (Liquified Petroleum Gas) lines on the 2001 Knight motor homes are being routed unprotected in the vehicle's wheel well area.

As you are aware, ODI has received a complaint from a motor home owner alleging that while he was inspecting a rear tire that had experienced a blow-out, he detected a LP gas odor in the wheel well area which permeated to the inside of his motor home. ODI is concerned that routing unprotected or inadequate shielded LP gas lines in areas that are prone to be subjected to road debris and possible damage from sections of tread/tires in the event of tire failures, such as a "blow-out," could increase the risk of a vehicle fires.

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

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

- **Subject vehicle:** 2001 Knight motor homes manufactured by Monaco Coach Corporation and any other Class "A" motor home with similar routed/plumbed LP gas lines sold or leased in the United States
- **Alleged Defect:** any leakage of LP gas (within a rear wheel well) on a subject vehicle from a LP gas line due to damage sustained from road debris or from a failed tire.



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- **Monaco Coach Corporation ("Monaco"):** 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 Monaco (including all business units and persons previously referred to), who are or, in or after 1998 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.

- **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 Monaco's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. By model, model year, state the total number of subject motor homes sold in the United States.

2. By make, model and model year, identify any other motor home and their populations (other than the subject vehicles) sold by Monaco in the United States that were equipped with the LP gas lines routed in the rear open wheel well area as the subject vehicles.

3. State the number and provide copies of all documents related to the following, from all sources, of which Monaco is aware and which relate, or could relate to the alleged defect in the subject vehicles:
 - a. owner/fleet complaints;
 - b. field reports;
 - c. crash/incident claims;
 - d. subrogation claims;
 - e. lawsuits; and
 - f. third-party arbitration proceedings (where Monaco is a party to the arbitration).

Please list and collate your response for each category ("a" through "f") by date of claim. Please provide for each item in this question the incident date, mileage of vehicle at time of incident (if known), approximate age of vehicle or model year, disposition of matter, owners name, address, phone number and, where a fleet vehicle is involved, the name of the fleet, and the name and telephone number of a contact person at that fleet. For items "a" through "d" please provide all related information and reports whether or not Monaco has verified each one. For items "e" and "f," summaries are acceptable. Please identify in the summary the caption, court, docket number, and filing date of each lawsuit if a copy of the complaint initiating the lawsuit is not provided. Multiple attempts to repair the complaint should be counted and listed separately.

4. State the total number of warranty claims, including extended warranty claims, and requests for "good will," field, or zone adjustments received by Monaco that could relate to the alleged defect in the subject vehicles. Provide a copy of each claim. Please provide for each item in this question a table showing the incident date, mileage of vehicle at time of incident (if known), model year, owners complaint, disposition of matter, owners name, address, phone number and, where a fleet vehicle is involved, the name of the fleet, and the name and telephone number of a contact person in that fleet. Each problem claim code must be identified. For those VINs with multiple warranty claims occurring on different dates, Monaco should count each claim separately. Each warranty/problem claim code must be identified. Also, include any claim that was denied by Monaco.
5. Identify and describe, and provide copies of all documents relating to, all testing, studies, surveys, assessments, and evaluations undertaken by or for Monaco that relate to the alleged defect in the motor homes. For each activity, state the date on which it was initiated, state the reason(s) why it was initiated, state the name and address of the person responsible for conducting the activity, state the objectives of the activity, and describe the activity, identifying any parts involved and state the source of the parts, and summarizing the results, if any, that have been obtained. If the activity is still ongoing,

state the target completion date. Provide copies of all documents relating to each of the listed activities, regardless of whether they are in interim, draft, or final form.

6. Identify and describe all modifications or changes made by Monaco in the design, or material composition, or parts thereof, that relate, or could relate, to the alleged defect since the introduction of this model. Separately state the following information for each such modification or change:
 - a. the time period during which the modification or change was developed;
 - b. the date or approximate date on which the modification or change was approved for production;
 - c. the names, titles, telephone numbers of all engineers involved in the development and/or the approval of the change or modification;
 - d. the date or approximate date on which the modification or change was incorporated into production;
 - e. a description of the modification or change, including an explanation of all differences between the original and the replacement part;
 - f. the reason for the modification or change;
 - g. the models affected by the modification or change;
 - h. the previous and the new part number(s) for the parts incorporating the modification or change; and
 - i. whether the modified or changed components can be interchanged with earlier production components.
7. Identify 5 owners of the subject vehicles for each model year in the Washington D.C. area. For each owner identified, provide a current address, telephone number, and contact person (if applicable), and include the model and model year of the motor home.
8. Describe the process by which Monaco receives warranty claims, owner's complaints, and reports from vehicle owners, vehicle manufacturers, dealers, distributors, and repair facilities. Separately estimate the period that elapses from the initial filing of the warranty claim, complaint, or report to the time that Monaco takes action on the matter. Describe the measures, if any, that are taken to ensure that a record is kept of the owners/complainants who have been denied requested warranty or goodwill repair(s). Explain why the complaint vehicle was denied warranty coverage or goodwill repairs on the alleged failure that occurred.
9. Provide copies of any service or technical bulletins, product improvement campaign announcements, or advisories, and all other communications concerning the alleged defect that Monaco has issued to manufacturers, fleets, dealers, zone offices, or field offices. If no such communications have been issued, so state. If Monaco drafted any

such communications, furnish a copy of the draft. For any such communication that has been issued, identify, by name, address, telephone number, and contact person, each entity to which it was sent, the date on which the communication was sent, and the type of vehicle to which the communication pertained. For each such communication:

- a. Provide a complete chronology, listing all activities or events, including, but not limited to, incidents involving a leaking LP gas line in a rear wheel well, which led Monaco to issue the communication;
 - b. State the number of repairs and/or replacements paid for by Monaco that resulted from the communication identified. List your response by repairing dealer (and include the dealer's name, address, and telephone number).
10. Provide copies of the engineering specification drawing(s) for the routing of the LP gas lines depicting their route and any protective covering used on the LP gas lines for each of the subject motor homes identified in question number one and question number two. Identify the size and location of the LP gas storage tank. Furnish the material specifications and the material composition for each component (gas hoses/lines, "black piping"), if not included on the drawings. Provide copies of any information, such as codes, standards, or recommendations, germane to the alleged defect published by trade groups such as the Recreation Vehicle Industries Association (RVIA), American National Standard Institute (ANSI), etc. and state whether Monaco complies with such standard or recommendation.
11. Provide a copy of any manuals or other material offered to assist field technicians in the proper diagnosis and repair of the LP gas system for each subject vehicle
12. Furnish Monaco's assessment of the alleged defect in the subject vehicle, including:
- a. all causal or contributory factors;
 - b. the failure mode;
 - c. model, model years affected and why the defect is limited to these particular model, model year vehicles;
 - d. the risk to motor vehicle safety that it poses; and
 - e. whether there are any circumstances that would provide vehicle operators or others with warning of its existence.

Also, separately, furnish Monaco's assessment of the complaint vehicle and state what repairs were performed and the current disposition of the complaint.

13. Identify what action Monaco intends to take on this matter.
14. Provide the dates in which Monaco ceased collecting data in response to each item of this information request.

This letter is being sent to Monaco 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. Monaco's failure to respond promptly and fully to this letter could subject Monaco 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.

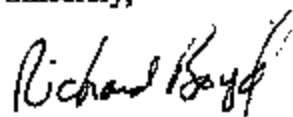
If Monaco cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Monaco does not submit one or more requested documents or items of information in response to this information request, Monaco 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.

Monaco's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by November 12, 2004. Please refer to PE04-068 in Monaco's response to this letter. If Monaco finds that it is unable to provide all of the information requested within the time allotted, Monaco must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Monaco 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 Monaco then has available, even if an extension has been granted.

If Monaco 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, Monaco 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. Monaco 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. Sonny Murianka of my staff at (202) 366-5196.

Sincerely,

A handwritten signature in cursive script that reads "Richard Boyd".

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