



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

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

MAR 26 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dick Cutcher
Champion Motor Coach
331 Graham Road
P.O. Box 158
Imlay City, MI 48444

NVS-214LLo
PE04-008

Dear Mr. Cutcher:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Champion has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Champion buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Champion Motor Coach:** all the personnel and files of Champion including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4236

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Champion buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Champion, or of which Champion is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Champion has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Champion pertaining to the alleged defect (where Champion is or was a defendant or codefendant). Provide Champion's analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

This letter is being sent to Champion 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. Champion's failure to respond promptly and fully to this letter could subject Champion 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 Champion 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, Champion does not submit one or more requested documents or items of information in response to this information request, Champion must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the Champion and position of the person(s) from, and the person(s) to whom it was sent, and the Champion 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.

Champion's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Champion's response to this letter. If Champion finds that it is unable to provide all of the information requested within the time allotted, Champion must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Champion 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 Champion then has available, even if an extension has been granted.

If Champion 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, Champion 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. Champion is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

400 Seventh Street, S.W.
Washington, D.C. 20690

JAN 26 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George D'Amato
Coach & Equipment Manufacturing Corporation
130 Horizon Park Drive
P.O. Box 36
Penn Yan, NY 14527

NVS-214LLo
PE04-008

Dear Mr. D'Amato:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Coach & Equipment Manufacturing Corporation (Coach) has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Coach buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Coach & Equipment Manufacturing Corporation:** all the personnel and files of Coach including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4296

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Coach buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Coach, or of which Coach is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Coach has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Coach pertaining to the alleged defect (where Coach is or was a defendant or codefendant). Provide Coach's analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

This letter is being sent to Coach 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. Coach's failure to respond promptly and fully to this letter could subject Coach 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 Coach 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, Coach does not submit one or more requested documents or items of information in response to this information request, Coach must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the Coach and position of the person(s) from, and the person(s) to whom it was sent, and the Coach 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.

Coach's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Coach's response to this letter. If Coach finds that it is unable to provide all of the information requested within the time allotted, Coach must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Coach 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 Coach then has available, even if an extension has been granted.

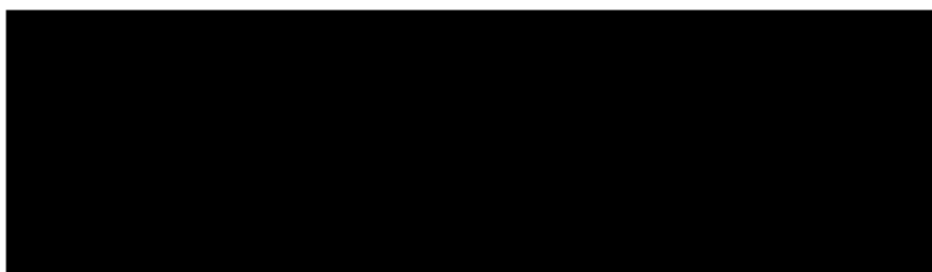
If Coach claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Coach must submit supporting information together 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. Coach is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

MAR 26 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Virgil Schremmer
Collins Bus Corporation
415 West 6th Street
South Hutchinson, KS 67505

NVS-214LLo
PE04-008

Dear Mr. Schremmer:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Collins has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Collins buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Collins Bus Corporation:** all the personnel and files of Collins including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4238

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Collins buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Collins, or of which Collins is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Collins has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Collins pertaining to the alleged defect (where Collins is or was a defendant or codefendant). Provide Collins analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

This letter is being sent to Collins 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. Collins' failure to respond promptly and fully to this letter could subject Collins 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 Collins 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, Collins does not submit one or more requested documents or items of information in response to this information request, Collins must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the Collins and position of the person(s) from, and the person(s) to whom it was sent, and the Collins 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.

Collins' response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Collins' response to this letter. If Collins finds that it is unable to provide all of the information requested within the time allotted, Collins must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Collins 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 Collins then has available, even if an extension has been granted.

If Collins 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, Collins 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. Collins is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

1/28/04 10:11 AM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dick Seybolt, Owner
Diamond Coach
2300 W. 4th Street
P.O. Box 489
Oswego, KS 67356

NVS-214LLo
PE04-008

Dear Mr. Seybolt:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Diamond Coach has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Diamond Coach buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Diamond Coach Coach:** all the personnel and files of Diamond Coach including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4238

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Diamond Coach buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Diamond Coach, or of which Diamond Coach is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Diamond Coach has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Diamond Coach pertaining to the alleged defect (where Diamond Coach is or was a defendant or codefendant). Provide Diamond Coach analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

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

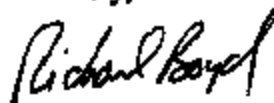
If Diamond Coach cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Diamond Coach does not submit one or more requested documents or items of information in response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

Diamond Coach's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Diamond Coach's response to this letter. If Diamond Coach finds that it is unable to provide all of the information requested within the time allotted, Diamond Coach must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Diamond Coach 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 Diamond Coach then has available, even if an extension has been granted.

If Diamond Coach 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, Diamond Coach 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. Diamond Coach is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bernie Regnier
El Dorado National
1655 Wall Street
Salina, KS 67401

NVS-214LLo
PE04-008

Dear Mr. Regnier:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that El Dorado has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 El Dorado buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **El Dorado National:** all the personnel and files of El Dorado including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4238

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of El Dorado buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by El Dorado, or of which El Dorado is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if El Dorado has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to El Dorado pertaining to the alleged defect (where El Dorado is or was a defendant or codefendant). Provide El Dorado analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

This letter is being sent to El Dorado 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. El Dorado's failure to respond promptly and fully to this letter could subject El Dorado 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 El Dorado 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, El Dorado does not submit one or more requested documents or items of information in response to this information request, El Dorado must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the El Dorado and position of the person(s) from, and the person(s) to whom it was sent, and the El Dorado 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.

El Dorado's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in El Dorado's response to this letter. If El Dorado finds that it is unable to provide all of the information requested within the time allotted, El Dorado must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If El Dorado 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 El Dorado then has available, even if an extension has been granted.

If El Dorado 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, El Dorado 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. El Dorado is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ken Lynch
Federal Coach
7400 South 28th Street
Fort Smith, AR 72908

NVS-214LLo
PE04-008

Dear Mr. Lynch:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Federal Coach has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Federal Coach buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Federal Coach:** all the personnel and files of Federal Coach including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4236

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Federal Coach buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Federal Coach, or of which Federal Coach is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Federal Coach has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Federal Coach pertaining to the alleged defect (where Federal Coach is or was a defendant or codefendant). Provide Federal Coach analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

This letter is being sent to Federal Coach 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. Federal Coach's failure to respond promptly and fully to this letter could subject Federal Coach 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 Federal Coach 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, Federal Coach does not submit one or more requested documents or items of information in response to this information request, Federal Coach must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the Federal Coach and position of the person(s) from, and the person(s) to whom it was sent, and the Federal Coach 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.

Federal Coach's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Federal Coach's response to this letter. If Federal Coach finds that it is unable to provide all of the information requested within the time allotted, Federal Coach must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Federal Coach 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 Federal Coach then has available, even if an extension has been granted.

If Federal Coach 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, Federal Coach 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. Federal Coach is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

1 1 2 0 0 4

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Ramsay
Glaval Bus
914 County Road 1
Elkhart, IN 46514

NVS-214LLo
PE04-008

Dear Mr. Ramsay:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Glaval has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Glaval buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Glaval Bus:** all the personnel and files of Glaval including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4238

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Glaval buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Glaval, or of which Glaval is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Glaval has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Glaval pertaining to the alleged defect (where Glaval is or was a defendant or codefendant). Provide Glaval analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

This letter is being sent to Glaval 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. Glaval's failure to respond promptly and fully to this letter could subject Glaval 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 Glaval 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, Glaval does not submit one or more requested documents or items of information in response to this information request, Glaval must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the Glaval and position of the person(s) from, and the person(s) to whom it was sent, and the Glaval 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.

Glaval's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Glaval's response to this letter. If Glaval finds that it is unable to provide all of the information requested within the time allotted, Glaval must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Glaval 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 Glaval then has available, even if an extension has been granted.

If Glaval 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, Glaval 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. Glaval is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

01/26/04

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ed Grech
Krystal Koach
2701 E. Imperial Highway
Brea, CA 92821

NVS-214LLo
PE04-008

Dear Mr. Grech:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Krystal Koach has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles**: all 2000-2002 Krystal Koach buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Krystal Koach**: all the personnel and files of Krystal Koach including all field personnel.
- **Alleged defect**: for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4296

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Krystal Koach buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Krystal Koach, or of which Krystal Koach is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Krystal Koach has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Krystal Koach pertaining to the alleged defect (where Krystal Koach is or was a defendant or codefendant). Provide Krystal Koach analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

This letter is being sent to Krystal Koach 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. Krystal Koach's failure to respond promptly and fully to this letter could subject Krystal Koach 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 Krystal Koach 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, Krystal Koach does not submit one or more requested documents or items of information in response to this information request, Krystal Koach must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the Krystal Koach and position of the person(s) from, and the person(s) to whom it was sent, and the Krystal Koach 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.

Krystal Koach's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Krystal Koach's response to this letter. If Krystal Koach finds that it is unable to provide all of the information requested within the time allotted, Krystal Koach must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Krystal Koach 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 Krystal Koach then has available, even if an extension has been granted.

If Krystal Koach 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, Krystal Koach 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. Krystal Koach is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mike Miller
Starcraft Bus & Mobility
2703 College Avenue
P.O. Box 1903
Goshen, IN 46526

NVS-214LLo
PE04-008

Dear Mr. Miller:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Starcraft has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Starcraft buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Starcraft Bus & Mobility:** all the personnel and files of Starcraft including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4236

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Starcraft buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Starcraft, or of which Starcraft is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Starcraft has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Starcraft pertaining to the alleged defect (where Starcraft is or was a defendant or codefendant). Provide Starcraft analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

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

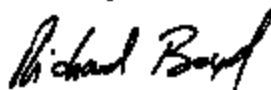
If Starcraft cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Starcraft does not submit one or more requested documents or items of information in response to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

Starcraft's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Starcraft's response to this letter. If Starcraft finds that it is unable to provide all of the information requested within the time allotted, Starcraft must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Starcraft 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 Starcraft then has available, even if an extension has been granted.

If Starcraft 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, Starcraft 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. Starcraft is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kevin Kropf
Startrans
2592 E. Kercher Road
P.O. Box 463
Goshen, IN 46528

NVS-214LLo
PE04-008

Dear Mr. Kropf:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Startrans has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Startrans buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Startrans:** all the personnel and files of Startrans including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4238

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Startrans buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Startrans, or of which Startrans is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Startrans has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Startrans pertaining to the alleged defect (where Startrans is or was a defendant or codefendant). Provide Startrans analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

This letter is being sent to Startrans 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. Startrans' failure to respond promptly and fully to this letter could subject Startrans 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 Startrans 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, Startrans does not submit one or more requested documents or items of information in response to this information request, Startrans must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the Startrans and position of the person(s) from, and the person(s) to whom it was sent, and the Startrans 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.

Startrans' response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Startrans' response to this letter. If Startrans finds that it is unable to provide all of the information requested within the time allotted, Startrans must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Startrans 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 Startrans then has available, even if an extension has been granted.

If Startrans 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, Startrans 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. Startrans is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

MAR 26 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John O'Leary, President
Thomas Built Buses
1408 Courtesy Road
High Point, NC 27260

NVS-214LLo
PE04-008

Dear Mr. O'Leary:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Thomas Built (Thomas) has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Thomas buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Thomas Built Buses:** all the personnel and files of Thomas including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4288

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Thomas buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Thomas, or of which Thomas is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Thomas has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Thomas pertaining to the alleged defect (where Thomas is or was a defendant or codefendant). Provide Thomas analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

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

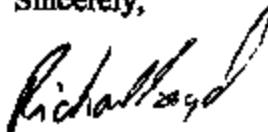
If Thomas cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Thomas does not submit one or more requested documents or items of information in response to this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

Thomas' response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Thomas' response to this letter. If Thomas finds that it is unable to provide all of the information requested within the time allotted, Thomas must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Thomas 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 Thomas then has available, even if an extension has been granted.

If Thomas 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, Thomas 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. Thomas is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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





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

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

448 26 .wz

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Goerlach
Turtle Top
67819 State Road 15
New Paris, IN 46553

NVS-214LLO
PE04-008

Dear Mr. Goerlach:

On January 26, 2004, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) initiated a Preliminary Evaluation to investigate reported incidents of engine compartment fires in 2000-2002 Goshen buses manufactured by Goshen Coach and built on General Motors and Ford cutaway chassis (PE04-008).

This Preliminary Evaluation was initiated based on the report of an engine compartment fire in a Goshen bus, which resulted in a fatality.

ODI is not currently aware of any information that indicates that Turtle Top has experienced any complaints regarding this issue. The purpose of this letter is to request peer information from your company that is intended to assist ODI in its investigation by providing information about your company's experience regarding engine compartment fires. NHTSA requests that all information be identified as "NHTSA File PE04-008."

Questions regarding content and format should be reviewed with Mr. Luke Loy, who can be reached at 202-366-3348 or via email at Luke.Loy@nhtsa.dot.gov.

Unless otherwise stated in the text, the following definition applies to these information requests:

- **Subject vehicles:** all 2000-2002 Turtle Top buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
- **Turtle Top:** all the personnel and files of Turtle Top including all field personnel.
- **Alleged defect:** for the purpose of this information request, the term alleged defect includes any or all of the following:
 - a. fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment



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888-327-4236

- b. melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- c. smoke damage or evidence of smoke damage of any components in the engine department

In order to assist the current investigation, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following questions. Please repeat the applicable question verbatim above each of your responses. For each response, identify the source of the information and indicate the last date the information was gathered.

1. Furnish the total number of Turtle Top buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.
2. Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Turtle Top, or of which Turtle Top is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Turtle Top has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.
3. Identify and describe all accidents, subrogation claims, or lawsuits known to Turtle Top pertaining to the alleged defect (where Turtle Top is or was a defendant or codefendant). Provide Turtle Top analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.
4. Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:
 - a. the reason for the modification or change;
 - b. a description of the modification or change;
 - c. the approximate calendar date on which the modification or change was incorporated into production; and
 - d. state whether the modified or changed components could be interchanged with earlier production components.
5. Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claim code must be identified.

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

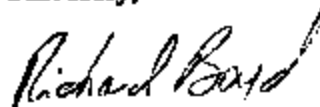
If Turtle Top cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Turtle Top does not submit one or more requested documents or items of information in response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

Turtle Top's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 23, 2004. Please refer to PE04-008 in Turtle Top's response to this letter. If Turtle Top finds that it is unable to provide all of the information requested within the time allotted, Turtle Top must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Turtle Top 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 Turtle Top then has available, even if an extension has been granted.

If Turtle Top 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, Turtle Top 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. Turtle Top is required to submit two copies of the documents containing allegedly confidential information 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 Luke Loy of my staff at (202) 366-3348.

Sincerely,



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

