



Steve Worthington  
Goshen Coach Div of VSV Group  
1110 DI Drive  
Elkhart, IN 46514

May 21, 2004

PE04-008

Luke Loy  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
U. S. Department of Transportation  
400 7<sup>th</sup> Street, SW Room 5319A  
Washington, DC 20590

Dear Sir:

1. State, by model and model year and chassis (Ford or General Motors), the number of subject vehicles Goshen has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Goshen, state the following:
  - a. Vehicle identification number (VIN);
  - b. Make;
  - c. Model;
  - d. Model Year;
  - e. Date of manufacture;
  - f. Date warranty coverage commenced; and
  - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

See the spreadsheet that was FedEx'd to you entitled "tblProductionData" for detailed records of those buses produced on a GM or Ford cutaway chassis. See attached "tblProductionData" for summary.

2. State the number of each of the following, received by Goshen, or of which Goshen is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
  - a. Consumer complaints, including those from fleet operators;
  - b. Field reports, including dealer field reports;
  - c. Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
  - d. Property damage claims; and
  - e. Third-party arbitration proceedings where Goshen is or was a party to the arbitration; and
  - f. Lawsuits, both pending and closed, in which Goshen is or was a defendant or codefendant.

For subparts "a" through "e," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to

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be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

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

We have not received any consumer complaints or property damage complaints relating to any relevant defects relating to this subject matter.

There was a pending lawsuit on GCC14027, which was settled prior to an assessment being achieved. The problem stemmed from a para-transit bus fire, which result in the death of Kenneth Staples on June 24, 2003. We are unaware of the vehicle's mileage or if there were any other injuries.

In addition, we have been made aware of a bus fire involving the CNG system on GCC15066. Ford Motor Company conducted the investigation and paid for the property damage in that instance.

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

See attached spreadsheet for data.

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Goshen used for organizing the documents.

As related to [REDACTED] bus fire; certain documents are restricted due to a confidentiality agreement as part of the settlement. The documents include, but are not limited to, the Allentown police department investigation files (which includes video tapes, over three hundred fifty photographs, as well as one to two hundred pages in the police report). Any or all of these can be provided upon specific request after review of our legal counsel to insure that the confidentiality is not breached by so doing

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5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Goshen to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

No specific warranty claims have been paid as related to the alleged defect.

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

- a. Goshen's claim number; none paid
  - b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
  - c. VIN;
  - d. Repair date;
  - e. Vehicle mileage at time of repair;
  - f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
  - g. Labor operation number;
  - h. Problem code;
  - i. Replacement part number(s) and description(s);
  - j. Concern stated by customer; and
  - k. Comment, if any, by dealer/technician relating to claim and/or repair.
6. Describe in detail the search criteria used by Goshen to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Goshen on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect that Goshen offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Our warranty claim database was searched for the keywords: fire, smoke, and engine.

Any matches were reviewed for applicability to the alleged defect. We do not have specific claim codes for this type of defect.

See attached copies of our warranty coverage. We offer extended warranties covering structural integrity only. The extended warranties are as required by specific contract obligations.

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Goshen has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard

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shop manuals. Also include the latest draft copy of any communication that manufacturer's short name is planning to issue within the next 120 days.

We have not sent any such communication to our dealers.

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

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

There was a pending lawsuit on GCC14027, which was settled prior to an assessment being achieved. Based upon the police report and limited discernable evidence, Goshen was unable to further analyze and investigate and/or determine the cause of this unfortunate incident.

9. Furnish Goshen's assessment of the alleged defect in the subject vehicle, including:
- The causal or contributory factor(s);
  - The failure mechanism(s);
  - The failure mode(s);
  - The risk to motor vehicle safety that it poses;
  - What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
  - The reports included with this inquiry.

There was a pending lawsuit on GCC14027, which was settled prior to an assessment being achieved.

Sincerely,

  
Steve Worthington  
Director of Engineering

  
Norm Floria  
CFO