

MAR 23 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ron Stichter
Director of Engineering
Newmar Corporation
355 N. Delaware St.
P. O. Box 30
Nappanee, IN 46550-0030

EA05-011
NVS- 214gtb

Subject: Effectiveness of Newmar Corporation Campaign 04V-037

Ref: Office of Defects Investigation (ODI) File: EA05-011 (Country Coach)

The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) is conducting an investigation (EA05-011) of front tire failures that have occurred in 1995-2000 model year Country Coach Allure and Intrigue model vehicles after the front tires installed in these vehicles had been replaced as directed by various Safety Campaigns issued by Country Coach for the specific intention of eliminating or curtailing the risk of front tire failures.

The purpose of this letter is to request peer information from Newmar Corporation ("Newmar") that will assist ODI in this evaluation.

ODI research of past campaigns indicates that Newmar filed Defect Report 04V-037 on January 16, 2004. This campaign was intended to address front tire failures that had occurred within a 3,589 unit population of model year 1997-2000 Newmar model Dutch Star and model year 2001-2002 model year Kountry Star motor homes.

According to Newmar's January 16, 2004, Defect Report, each remedied vehicle was to replace the currently installed Michelin 255/80R22.5 front tires with new Michelin 275/70R22.5 XZA1 front tires and have a new certification label applied to the vehicle (intended to document an increase in the rear tire pressure to 105 psi).

ODI records indicate that Newmar filed their most recent quarterly Campaign Completion Status Report (per 49 CFR Part 573.6) on July 28, 2005. This report indicates that 2,176 vehicles had been remedied indicating a 61% completion rate.

Information Requested –

In order for my staff to further evaluate the effectiveness of Campaigns addressing front tire failures, ODI is requesting certain information regarding the vehicles that were the subject of Campaign 04V-037.

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

- **Subject vehicle(s)**: all 1997 – 2000 model year Dutch Star and model year 2001-2002 Kountry Star vehicles that Newmar addressed by Campaign 04V-037.
- **Subject components**: front tires installed as either original or replacement equipment in the subject vehicles.
- **Newmar Corporation (“Newmar”)**: all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee to a consultant) by or under the control of Newmar (including all business units and persons previously referred to), who are or, in or after 2003 were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
 - d. Communication to, from, or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.

- **Failure Reports:** Reports of a front tire failure, whether drivers side (left) or passenger side (right), whether confirmed or alleged, including but not limited to, (1) air loss resulting in inability of the tire to support the wheel load; (2) blow-out; (3) rapid loss of air; (4) deflation; (5) tread separation; (6) sidewall cracking; and the like.

This request includes reports of tire failures due to unknown causes or caused by road debris and the like.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Newmar, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available,

"document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.

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

Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response.

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

To the extent possible, provide the requested information in Microsoft 2000 Access or Excel electronic format.

CAMPAIGN 04V-037 EFFECTIVENESS -

1. State the number of subject vehicles that Newmar addressed with Campaign 04V-037 in which the Newmar intended and/or specified that one or both of the originally-installed right and left front tires be replaced with a larger size tires (e.g. Michelin 275/70R22.5 XZA1).

2. State the number of vehicles that Newmar has remedied to date by replacing one or both of the originally-installed right and left front tires with a larger size tire (e.g. Michelin 275/70R22.5 XZA1) as intended and/or specified by Campaign 04V-037.

3. State the number of front tire failures that have occurred in the subject vehicles addressed by Campaign 04V-037
 - (a) Prior to having one of both front tires replaced with a larger size tire as intended/specified by Campaign 04V-037;
 - (b) After vehicles had been remedied by having one or both of the front tires replaced with a larger size tire as prescribed by Campaign 04V-037;
 - (c) In unresponsive vehicles (i.e. those vehicles that Newmar identified as candidates for having one or both of the front tires replaced with a larger size tire as required by Campaign 04V-037 but which had not been remedied prior to the tire failure due to misdirected / misplaced notices, unresponsive owners, etc.)

FRONT TIRE CAPACITY IMPROVEMENT – Campaign 04V-037

4. For each of the originally installed front tire sizes that Newmar intended and/or specified be replaced with a larger size tire (e.g. Michelin 275/70R22.5 XZA1), provide a table that lists:
 - (a) the nominal size of the originally installed front tires;
 - (b) the recommended tire inflation pressure of the originally installed front tires;
 - (c) the nominal size of the replacement front tires (if other than Michelin 275/70R22.5 XZA1);
 - (d) the recommended tire inflation pressure for the replacement tires;
 - (e) an estimate of the increase in front tire capacity achieved by replacing the originally-installed front tire sizes with the corresponding new larger size replacement front tire size(s).

5. Briefly describe all field modifications that Newmar made to the body or frame of any of the vehicles addressed by Campaign 04V-037 to accommodate the installation (i.e. provide clearance) for the larger size replacement front tire being installed per Campaign 04V-037.

Describe which product lines, vehicle configurations and/or group(s) of vehicles, if any, required the described modifications.

6. Describe Newmar's current policy and design guidelines for specifying / selecting front tires to assure that there is a "reserve capacity" or "safety margin" for front tires to safely accommodate circumstances when the front tire may be subjected to under-inflation and/or overload conditions.

7. Describe Newmar's current policy and/or recommendations for owners regarding inspection and/or replacement of tires due to age.

8. Describe Newmar's current policy and design guidelines for specifying / selecting front tires based on speed rating.

This letter is being sent to Newmar 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. Newmar's failure to respond promptly and fully to this letter could subject Newmar 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 Newmar 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, Newmar does not submit one or more requested documents

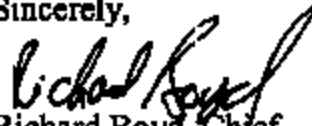
or items of information in response to this information request, Newmar must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Newmar's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by May 1, 2006. Please refer to EA05-011 in Newmar's response to this letter. If Newmar finds that it is unable to provide all of the information requested within the time allotted, Newmar must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Newmar 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 Newmar then has available, even if an extension has been granted.

If Newmar 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, Newmar 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. Newmar is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Mr. Tom Bowman of my staff at (202) 366-2583.

Sincerely,



Richard Boyd, Chief

Medium and Heavy Duty Vehicle Division
Office of Defects Investigation