



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

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

JUN 23 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bill Humphrey
Sunnybrook RV, Inc.
201 14th Street
Middlebury, IN 46540

NVS-214gtb
PE05-024

Dear Mr. Humphrey:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has initiated PE05-024 to investigate wheel cracking and breaking in Sunnybrook model year 2005 Titan (31BW-KS) "towable" Recreational Vehicles (RVs).

Background

Under certain reporting requirements of EAO4-032 (similar to the requirements outlined in a subsequent section of this request titled "Newly Reported Incidents"), on April 16, 2005, Keystone RV reported that a wheel identified as "US977680HD" had failed due to a broken weld. The intact weld had attached the wheel rim to the wheel center section and, after breaking, had allowed the tire and rim portion of the wheel to separate from the wheel center. ODI's subsequent inquiry determined that Keystone RV had purchased the "incident wheel" from Tredit Tire and that Tredit Tire had purchased the "incident wheel" from U. S. Wheel, the original equipment manufacturer of the wheel.

To develop additional background information, ODI asked Tredit Tire to furnish a list of recent (since September 2004) purchasers of the wheels identified as "US977680HD" and "US977680CC." "US977680CC" is a wheel that is similar to "US977680HD" in material composition (chrome plated steel), fabrication, manufacturing source, and mounting system (8-hole). "US977680CC" is rated at 3042 lbs whereas the "US977680HD" is rated at 3750 lbs.

On April 12, 2005, in response to ODI's inquiry, Tredit Tire provided ODI with information that summarized Sunnybrook RV's purchases of the suspect wheels and indicated that Sunnybrook RV has purchased approximately 1,954 wheels identified as part number US977680CC between September 2004 and April 2005.



DOT AUTO SAFETY HOTLINE
888-DASH-2-DOT
888-327-4236

ODI then requested Sunnybrook RV to identify all recent reports of wheel cracking, breaking and/or leaking. In response, Sunnybrook RV identified three incidents (listed below) that had been described the wheel welds as "separated" or "broken" alleged to have occurred in March and April, 2005.

VIN (*)	Vehicle Model	Model Year	Incident Date	Comment
4UBBT0P26 51XXXXXX	31BW-KS	2005	3/9/2005	"most welds between rim and hub separated"
4UBBT0P26 51XXXXXX	31BW-KS	2005	4/13/2005	"most welds between rim and hub separated"
4UBBT0P26 51XXXXXX	31BW-KS	2005	4/17/2005	"rim separated from hub all welds broken"

(*) To protect the privacy of the consumer, ODI has redacted (deleted) the final six digits of the VINs listed in the request.

ODI had also verbally requested Sunnybrook RV to inform ODI promptly of any newly reported incidents of wheel cracking or wheel breaking.

ODI is concerned that if a weld that attaches the wheel rim to the wheel center were to break, the wheel could separate completely from the vehicle. Wheel separations pose the following risks:

- (1) a wheel that separates at highway speeds poses a risk of property damage, personal injury, and possibly death to other users of the roadway and
- (2) the affected vehicle may lose stability.

ODI is also concerned that the tire mounted to a wheel that develops a crack in the rim and causes a significant loss of tire air pressure may pose a risk if the loss of air pressure is not detected and addressed by the vehicle operator. A vehicle that is operated with an under-inflated tire due to persistent air pressure loss could experience an unexpected and catastrophic tire failure.

The purpose of this letter is (1) to formally request that ODI be notified of all new reports of wheel cracking, breaking, and/or leaking in Sunnybrook RV vehicles and (2) to request certain information from Sunnybrook RV about wheels that have cracked, broken, and/or leaked air.

Newly Reported Incidents

ODI has requested Sunnybrook RV to notify ODI promptly of any newly reported wheel cracking, breaking, or leaking incidents (with incident details) that are reported to Sunnybrook RV during or after April 2005.

ODI requests prompt notification of any new wheel cracking, breaking, or leaking incidents reported since ODI may elect to have the wheels returned to ODI or to Sunnybrook RV's wheel supplier(s) for inspection. ODI wants to secure all potentially useful evidence as soon as possible before the fractured wheel is replaced and discarded or lost. Accordingly, ODI is requesting Sunnybrook RV to notify ODI within 48 hours when Sunnybrook RV learns of a wheel cracking, breaking, or leaking due to any cause, whether or not confirmed, regardless of vehicle age, and regardless of the suspected cause.

This reporting requirement is ongoing and terminates on December 31, 2005 but may be extended if circumstances warrant.

Each notification should be e-mailed to tom.bowman@nhtsa.dot.gov (phone 202-366-2583). The notification should provide as much of the following incident information as possible. Timeliness is critical. Any of the requested information that is not available at the time of initial incident notification may be withheld at that time but must be provided as soon thereafter as practical.

Each notification should, at a minimum, include the following information:

1. Date of Report
2. Complete 17 digit Vehicle Identification Number (VIN) of the Travel Trailer or Fifth Wheel Trailer;
3. Model Year of the Trailer;
4. Model Designation of Trailer;
5. Build date of Trailer;
6. Purchase Date of Trailer;
7. Incident Date;
8. Owner's name, address, and phone number;
9. Location of incident;
10. Whether any property damage, personal injuries, and/or fatalities are alleged to have resulted from the incident;
11. Current location of the trailer and the cracked, broken, and/or leaky wheel;
12. Name of Sunnybrook's supplier of the wheel;
13. Part number of the wheels installed in the incident vehicle;
14. Description of incident.

Information Requested

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

- **Subject vehicles**: all “towable” recreational vehicles manufactured by Sunnybrook, Inc. from Model Year 2005 to the present.
- **Subject component(s)**: wheel(s).
- **Sunnybrook RV, Inc. (“Sunnybrook”)**: all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Sunnybrook (including all business units and persons previously referred to), who are or, in or after 2005, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales); analysis, claims, or lawsuits; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect**: wheel breaking or cracking and/or wheel “air leak.”
- **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 Sunnybrook, 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 Sunnybrook or not. If a document is not in the English language, provide both the original document and an English translation of the document.

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

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Sunnybrook has previously provided a document to ODI, Sunnybrook may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. 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 Sunnybrook'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 Access or Excel 2000 electronic format.

Production Information

1. Identify by model and model year the number of subject vehicles (towable recreational vehicles) that Sunnybrook has manufactured for sale or lease in the United States since model year 2005.

Provide the table in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number 1 – Sunnybrook, Production Information."

Wheel Information

2. List the wheels (excluding spares) and the associated quantity that Sunnybrook installed as original equipment in the vehicles identified in response to Request No.1 by vehicle model and model year.
3. For each wheel part number listed in response to Request No. 2, provide a table that identifies:
 - a. Sunnybrook's part number;
 - b. the name of the wheel supplier;
 - b. the supplier's part number;
 - c. the wheel rating;
 - d. the number of mounting holes;
 - e. the mounting bolt circle diameter;
 - f. the nominal size of the mounting holes; and
 - g. a brief description of the material composition and construction of the wheel (e.g. cast aluminum, fabricated steel, fabricated chrome plated steel, etc).

Complaints

4. State the number of each of the following, received by Sunnybrook, or of which Sunnybrook is otherwise aware, which relate to, or may relate to, the alleged defect

in the subject vehicles received by Sunnybrook since June 30, 2004, pertaining to:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving an injury or fatality, based on claims against the manufacturer, 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;
- e. Third-party arbitration proceedings where Sunnybrook is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Sunnybrook is, or was, a defendant or codefendant.

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident are to be counted as 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 Sunnybrook's assessment of the problem, with a summary of the significant underlying facts and evidence. For item "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.

Provide this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number Four - Complaint Summary Data."

Note: Sunnybrook's response may exclude the three vehicles that allegedly experienced wheel separations in March and April 2005 and are listed above under "Background" since Sunnybrook has previously supplied ODI with information relative to these vehicles.

5. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of the response to Request No. 4, state the following information:
 - a. Sunnybrook's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 4 (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. Sunnybrook's Wheel Part Number;
- h. Name of Wheel Supplier;
- i. Supplier's Wheel Part Number;
- j. Incident date;
- k. Report or claim date;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any; and
- n. Number of alleged fatalities, if any.

Provide this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number Five – Complaint Details."

Note: Sunnybrook's response may exclude the three vehicles that allegedly experienced wheel separations in March and April 2005 and are listed above under "Background" since Sunnybrook has previously supplied ODI with information relative to these vehicles.

Warranty Claims

6. State, by model and model year, a total count for all of the following categories of claims, collectively, whether reimbursed, adjusted, or not reimbursed by Sunnybrook 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.

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

- a. Sunnybrook's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Sunnybrook's Wheel Part Number;
- e. Name of Wheel Supplier;
- f. Supplier's Wheel Part Number;
- g. Repair date;
- h. Vehicle mileage at time of repair;
- i. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- j. Labor operation number;
- k. Problem code;

- l. Replacement part number(s) and description(s);
- m. Concern stated by customer;
- n. Comment, if any, by dealer/technician relating to claim and/or repair; and
- o. Claim disposition (reimbursed, adjusted, or not reimbursed).

Provide this information in Microsoft Access 2000, or a compatible format, entitled "Request Number Six – Warranty Information."

Note: Sunnybrook's response may exclude the three vehicles that allegedly experienced wheel separations in March and April 2005 and are listed above under "Background" since Sunnybrook has previously supplied ODI with information relative to these vehicles.

7. Describe in detail the search criteria used by Sunnybrook to identify the claims identified in response to Request No. 6, 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 Sunnybrook 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) that Sunnybrook 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.

Replacement Parts Sales

8. List the part numbers of all wheels which Sunnybrook sold as replacement parts for the vehicles listed in response to Request No 1 and state the quantity of each aftermarket / replacement wheel by part number that Sunnybrook has sold by year from 2002 to the present.

Product, Process, and Sourcing Changes -

9. Describe all modifications or changes made by, or on behalf of, Sunnybrook in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from 2002 to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part numbers (service and engineering) of the original component;
- e. The part number (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and,
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Sunnybrook is aware of which may be incorporated into vehicle production within the next 120 days.

Note: Sunnybrook must clearly identify all changes intended to improve the integrity and durability of the wheel that were implemented in response to wheel cracking, breaking, or leaking problems.

10. Describe all requested deviations from conformance to specifications received from all sources, pertaining to the wheels installed in the vehicles identified in response in Request No.1, the affected vehicle production, and provide a summary of the disposition for each of the requested deviations.

Sunnybrook's Wheel Qualification Evaluation and Testing -

11. List and describe all assessments (analyses, tests, etc.) and provide a summary of the results of these assessments performed by, or for, Sunnybrook that were the basis for Sunnybrook's acceptance of the suitability (capacity, strength, fitment, etc.) of the wheels listed in response for Request No.2 for Sunnybrook's towable RV applications.

Parts Return, Examinations, and Findings

12. Provide a copy of all inspection reports conducted by Sunnybrook, Sunnybrook's suppliers, and/or sub-contractors on wheels removed from subject vehicles that had been reported cracked, broken, or leaking air.

13. 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, Sunnybrook. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.
14. 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.

Notices

15. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Sunnybrook 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 shop manuals. Also include the latest draft copy of any communication that Sunnybrook is planning to issue within the next 120 days.

Manufacturer's Assessment

16. Furnish Sunnybrook's assessment of a wheel that is cracked or broken through the weld that attaches the wheel rim to the wheel center in the subject components, including:
 - a. The failure mechanism(s);
 - b. The failure mode(s),
 - c. The risk to motor vehicle safety that posed;
 - d. 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.
17. Furnish Sunnybrook's assessment of a wheel that is cracked or broken through the rim resulting in a loss of tire air pressure in the subject components, including:

- a. The failure mechanism(s);
- b. The failure mode(s),
- c. The risk to motor vehicle safety that posed;
- d. 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. Include a discussion about the likelihood that a persistent loss of air pressure would be evident to the operator.

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

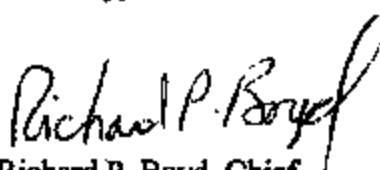
If Sunnybrook cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Sunnybrook does not submit one or more requested documents or items of information in response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

Sunnybrook's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **August 3, 2005**. Please refer to **PE05-024** in Sunnybrook's response to this letter. If Sunnybrook finds that it is unable to provide all of the information requested within the time allotted, Sunnybrook must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Sunnybrook 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 Sunnybrook then has available, even if an extension has been granted.

If Sunnybrook 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, Sunnybrook must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (68 Fed. Reg. 44209 et seq; July 28, 2003), to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Sunnybrook 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 Tom Bowman of my staff at (202) 366-2583.

Sincerely,

A handwritten signature in black ink that reads "Richard P. Boyd". The signature is written in a cursive style with a large, prominent "R" and "B".

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