



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

JUL 8 2005

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

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Chuck Zucker  
Monaco Coach Corporation  
P. O. Box 465  
Wakarusa, Indiana 46573

NVS-214gtb  
PE05-026

Dear Mr. Zucker:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has initiated PE05-026 to investigate wheel cracking and breaking in Monaco Coach model year 2003 and 2004 Presidential, Model Year 2003 Camelot, and Model Year 2005 Lakota 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 Monaco Coach's purchases of the suspect wheels. This information is summarized in the following table.



DOT AUTO SAFETY HOTLINE  
888-DASH-2-DOT  
888-327-4238

Sales of Wheel Part Numbers US977680HD and US977680CC  
to Monaco Coach Corporation between September 2004 and April 2005

Part Number	Quantity of Wheels
US977680CC	670
US977680HD	448

ODI then requested Monaco Coach to identify all recent reports of wheel cracking, breaking and/or leaking air. In response, Monaco Coach identified and provided ODI with summary information that described 52 reports received since March 2005 that relate to wheel complaints. ODI reviewed these reports and determined that ten of these reports do not appear to relate to the wheel cracking and breaking issue being investigated.

ODI then grouped the relevant 42 reports by general vehicle type (whether self-powered or "towable" vehicles) and by the nature of the wheel problem reported (whether the wheels had been reported as cracked or broken, leaking air, or indeterminate).

Following is a table summarizing the reports that ODI received from Monaco Coach. ODI has eliminated reports that provided "indeterminate" information and reports addressing wheel issues unrelated to cracking, breaking, or leaking air from this summary.

General Vehicle Type	Nature of Complaint	Number of Complaints (Received March 2005 - May, 2005)	Reference Attachments Summarizing Additional Details
"Towable" Vehicles (Travel Trailers and Fifth Wheels)	Cracked or Broken	15	A
	Leaked Air	18	B
Self-Powered Vehicles (Motor Home and Bus Chassis)	Bent	1	C
	Vibration	1	C

ODI has also verbally requested Monaco Coach to inform ODI promptly of any newly reported incidents of wheel cracking or wheel breaking.

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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 Monaco Coach vehicles and (2) to request certain information from Monaco Coach about wheels that have cracked, broken, and/or leaked air.

### **Newly Reported Incidents-**

ODI has requested Monaco Coach to notify ODI promptly of any newly reported wheel cracking, breaking, or leaking incidents (with incident details) that are reported to Monaco Coach 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 Monaco Coach'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 Monaco Coach to notify ODI within 48 hours when Monaco Coach 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@nhitsa.dot.gov](mailto:tom.bowman@nhitsa.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 Affected Vehicle (Travel Trailer, Fifth Wheel Trailer or "Powered Unit");
3. Model Year of the Vehicle;
4. Model Designation of the Vehicle, including whether the vehicle is a "powered" or "towable" vehicle;
5. Build date of Vehicle;
6. Purchase Date of Vehicle;
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 vehicle and the cracked, broken, and/or leaky wheel;
12. Name of Monaco Coach's supplier of the wheel;
13. Part number of the wheels installed in the incident vehicle; and
14. Description of incident.

**Information Requested –**

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

- **Subject vehicles:** all “towable” and powered recreational vehicles manufactured by Monaco Coach Corporation from Model Year 2003 to the present.
- **Subject component(s):** wheel(s).
- **Monaco Coach Corporation (“Monaco Coach”):** 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 Monaco Coach (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.
- **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 Monaco Coach, 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 Monaco Coach 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 Monaco Coach has previously provided a document to ODI, Monaco Coach 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 Monaco Coach'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- A. Identify by model and model year the number of “powered” (motor home and bus chassis) recreational vehicles that Monaco Coach has manufactured for sale or lease in the United States since model year 2003.

Provide the table in Microsoft Access or Excel 2000, or a compatible format, entitled “Request Number 1- A – Monaco Coach, Production Information, Powered Units.”

- 1-B. Identify by model and model year the number of “towable” (travel trailer and fifth wheel) recreational vehicles that Monaco Coach has manufactured for sale or lease in the United States since model year 2003.

Provide the table in Microsoft Access or Excel 2000, or a compatible format, entitled “Request Number 1-B – Monaco Coach, Production Information, ‘Towable’ Units.”

**Wheel Information** –

2. List the wheels (excluding spares) and the associated quantity that Monaco Coach has installed as original equipment in the vehicles identified in response to Request Nos.1-A and 1-B by vehicle model and model year.
3. For each wheel part number listed in response to Request No. 2, provide a table that identifies:
- Monaco Coach's part number;
  - the name of the wheel supplier;
  - the supplier's part number;
  - the wheel rating;
  - the number of mounting holes;
  - the mounting bolt circle diameter;
  - the nominal size of the mounting holes; and
  - 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-A. For each powered unit, state the number of each of the following, received by Monaco Coach, or of which Monaco Coach is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles received by Monaco Coach since June 30, 2002 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 Monaco Coach is or was a party to the arbitration; and
  - f. Lawsuits, both pending and closed, in which Monaco Coach is, or was, a defendant or codefendant.

Provide this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number 4-A - Wheel Complaint Summary Data, Powered Units."

- 4-B. For each "towable" unit, state the number of each of the following, received by Monaco Coach, or of which Monaco Coach is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles received by Monaco Coach since June 30, 2002 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 Monaco Coach is or was a party to the arbitration; and
  - f. Lawsuits, both pending and closed, in which Monaco Coach 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 Monaco Coach'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 4-B - Complaint Summary Data, 'Towable' Units."

Note: Monaco Coach's response may exclude the 52 vehicles that Monaco Coach has identified to ODI since late March, 2005 and which are summarized above under "Background" and further identified in Attachments A-C since Monaco Coach has previously supplied ODI with information relative to these vehicles.

5-A. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of the response to Request No. 4-A, state the following information:

- a. Monaco Coach's file number or other identifier used;
- b. The category of the item, as identified in Request No. 4-A (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. Monaco Coach's wheel part number;
- h. The name of the wheel supplier;
- i. The supplier's 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 5 - A - Complaint Details, Powered Units."

5-B. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of the response to Request No. 4-B, state the following information:

- a. Monaco Coach's file number or other identifier used;
- b. The category of the item, as identified in Request No. 4-B (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. Monaco Coach's wheel part number;
- h. The name of the wheel supplier;
- i. The supplier's 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 5 B --Complaint Details, 'Towable' Units."

Note: Monaco Coach's response may exclude the 52 vehicles that Monaco Coach has identified to ODI since late March, 2005 and which are summarized above under "Background" and further identified in Attachments A-C since Monaco Coach has previously supplied ODI with information relative to these vehicles.

#### Warranty Claims -

- 6-A. For powered units, 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 Monaco Coach 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. Monaco Coach's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Monaco Coach's wheel part number;

- e. The name of the wheel supplier;
- f. The supplier's 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 6-A, Warranty Information, Powered Units."

- 6-B. For "towable" units, 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 Monaco Coach 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. Monaco Coach's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Monaco Coach's wheel part number;
- e. The name of the wheel supplier;
- f. The supplier's 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 6 - B - Warranty Information, 'Towable' Units."

Note: Monaco Coach's response may exclude the 52 vehicles that Monaco Coach has identified to ODI since late March, 2005 and which are summarized above under "Background" and further identified in Attachments A-C since Monaco Coach has previously supplied ODI with information relative to these vehicles.

7. Describe in detail the search criteria used by Monaco Coach to identify the claims identified in response to Request No. 6-A and 6-B, 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 Monaco Coach 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 Monaco Coach 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 Monaco Coach sold as replacement parts for the vehicles listed in response to Request Nos. 1-A and 1-B and state the quantity of each aftermarket / replacement wheel by part number that Monaco Coach has sold by year from 2003 to the present.

#### **Product, Process, and Sourcing Changes -**

9. Describe all modifications or changes made by, or on behalf of, Monaco Coach in the design, material composition, manufacture, quality control, supply, or installation of the subject component(s), 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 Monaco Coach is aware of which may be incorporated into vehicle production within the next 120 days.

Note: Monaco Coach 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 Nos. 1-A and 1-B, the affected vehicle production, and provide a summary of the disposition for each of the requested deviations.

#### **Monaco Coach'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, Monaco Coach that were the basis for Monaco Coach's acceptance of the suitability (capacity, strength, fitment, etc.) of the wheels listed in response for Request Nos. 2-A and 2-B for Monaco Coach's applications.

#### **Parts Return, Examinations, and Findings**

- 12. Provide a copy of all inspection reports conducted by Monaco Coach, Monaco Coach'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, Monaco Coach. 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 Monaco Coach 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 Monaco Coach is planning to issue within the next 120 days.

#### **Manufacturer's Assessment**

16. Furnish Monaco Coach'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 when installed in (a) powered vehicles and (b) "towable" vehicles, 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 Monaco Coach's assessment of a wheel that is cracked or broken through the rim resulting in an loss of tire air pressure in the subject components, when installed in (a) powered vehicles and (b) "towable" vehicles 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 Monaco 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. Monaco Coach's failure to respond promptly and fully to this letter could subject Monaco 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 Monaco 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, Monaco Coach does not submit one or more requested documents or items of information in response to this information request, Monaco Coach must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Monaco Coach's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by August 15, 2005. Please refer to PE05-026 in Monaco Coach's response to this letter. If Monaco Coach finds that it is unable to provide all of the information requested within the time allotted, Monaco Coach must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Monaco 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 Monaco Coach then has available, even if an extension has been granted.

If Monaco 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, Monaco Coach 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. Monaco Coach 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 "Tom Bowman for R. Boyd". The signature is written in a cursive, flowing style.

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

Attachments

PE05-026  
Attachment A  
Sheet 1 of 2

**Summary of Wheel Complaints Indicating "cracked" or "broken" wheels installed in Monaco Coach Travel Trailer and Fifth Wheel "Towable" Recreational Vehicles based on Reports that Monaco Coach Provided to ODI in April-May, 2005.**

VIN (*)	Vehicle Model	Vehicle Model Year	5th or TT	Incident date	Report or Claim Date	Description of the Failure - For brevity, ODI has edited the description provided by Monaco Coach to eliminate non-essential information regarding parts return, warranty coverage, etc
1KB311R23 5EXXXXXX	1233 Presidential	2005	5th	11/13/2004	11/15/2004	Tire and wheel Hoop came apart from center section and rolled across road and hit a semi coming the other way. Center section remained in tack [sic] to hub with studs and nuts...while being delivered to dealer
1KB311R22 5EXXXXXX	1233 Presidential	2005	5th	2/7/2005	2/7/2005	rim and tire came apart from center section and rolled down the road
1KB311N23 2EXXXXXX	1233 Presidential	2002	5th	4/18/2005	4/18/2005	rim had broke at weld.
4K0331M25 5EXXXXXX	1241 Lakota	2005	5th	4/28/2005	5/2/2005	transport driver delivered unit with one ... wheel center was broke out
4K0331M22 5EXXXXXX	1241 Lakota	2005	5th	5/3/2005	5/3/2005	outer rim is coming off from center section
1KB331L223 EXXXXXX	1230 Alumascape	2003	5th	approx 5/2/05	5/16/2005	RF wheel Failure of weld on rim separated
1KB331R27 3EXXXXXX	1230 Alumascape	2003	5th	approx 5-13-05	5/17/2005	one tire and wheel came apart and other three rims are cracked at welds.
1KB311L295 EXXXXXX	1233 Presidential	2005	5th	5/17/2005	5/18/2005	unit has 4 rims cracked and broke
1KB311S28 4EXXXXXX	1233 Presidential	2004	5th	4/21/2005	4/21/2005	aluminum rim was cracked

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Attachment A  
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**Summary of Wheel Complaints indicating "cracked" or "broken" wheels installed in Monaco Coach Travel Trailer and Fifth Wheel "Towable" Recreational Vehicles based on Reports that Monaco Coach Provided to ODI in April-May, 2005.**

VIN (*)	Vehicle Model	Vehicle Model Year	5th or TT	Incident date	Report or Claim Date	Description of the Failure - For brevity, ODI has edited the description provided by Monaco Coach to eliminate non-essential information regarding parts return, warranty coverage, etc
1KB331M2X 5EXXXXXX	1230 Alumascape	2005	5th	4/29/2005	4/29/2005	Customer has one wheel coming apart and 3 others leaking.
1KB311S20 3EXXXXXX	1233 Presidential	2003	5th	3/29/2005	5/2/2005	3 Wheels Cracked and leaking
1KB311S29 4EXXXXXX	1233 Presidential	2004	5th	5/10/2005	5/20/2005	noticed tire going down and upon inspection found rim split
1KB311S29 4EXXXXXX	1233 Presidential	2004	5th	1/31/2005	5/26/2005	Aluminum wheel has cracked and split.
1KB331M21 5EXXXXXX	1230 Alumascape	2005	5th	12/6/2005	12/7/2005	rim has cracks on center mounting plate to outer hoop
1KB331M21 5EXXXXXX	1230 Alumascape	2005	5th	12/7/2005	12/7/2005	rim has cracks on center mounting plate to outer hoop

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

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Attachment B  
Sheet 1 of 2

**Summary of Wheel Complaints indicating wheels that were "leaking air" installed in Monaco Coach Travel Trailer and Fifth Wheel "Towable" Recreational Vehicles based on Reports that Monaco Coach Provided to ODI in April-May, 2005.**

VIN (*)	Vehicle Model	Vehicle Model Year	5th or TT	Incident date	Report or Claim Date	Description of the Failure - For brevity, ODI has edited the description provided by Monaco Coach to eliminate non-essential information regarding parts return, warranty coverage, etc
1KB311S215 EXXXXXXX	1233 Presidential	2005	5th	3/10/2005	3/14/2005	pinhole leak in the rim and leaks down
1KB311S245 EXXXXXXX	1233 Presidential	2005	5th	2/28/2005	3/28/2005	Tire was leaking on dealer lot removed and noticed wheel cracked and leaking
1KB331R205 EXXXXXXX	1230 Alumascape	2005	5th	4/5/2005	4/7/2005	Customer had trouble airing up 2 tires ... removed ... found air leaking through welds
1KB311S253 EXXXXXXX	1233 Presidential	2003	5th	3/22/2005	4/12/2005	rr tire had gone flat and air was leaking through weld in rim.
1KB311S234 EXXXXXXX	1233 Presidential	2004	5th	4/26/2005	4/28/2005	Unit has a second leaking wheel at weld
4K0311R274 EXXXXXXX	1240 Medallion	2004	5th	4/27/2005	4/28/2005	cracked weld leaking air.
1KB311S224 EXXXXXXX	1233 Presidential	2004	5th	2/22/2005	5/2/2005	2 rims leaking at welds
1KB311S235 EXXXXXXX	1233 Presidential	2005	5th	3/29/2005	5/5/2005	tire leaking down and found rim to be cracked
1KB311S284 EXXXXXXX	1233 Presidential	2004	5th	n/A	5/5/2005	one leaky aluminum wheel and 3 others with corrosion
1KB311P222 EXXXXXXX	1233 Presidential	2002	5th	3/31/2005	5/12/2005	2 rims leaking air through welds
1KB311L263 EXXXXXXX	1233 Presidential	2003	5th	5/18/2005	5/18/2005	Rim is leaking at the weld

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Attachment B  
Sheet 2 of 2

Summary of Wheel Complaints indicating wheels that were "leaking air" installed in Monaco Coach Travel Trailer and Fifth Wheel "Towable" Recreational Vehicles based on Reports that Monaco Coach Provided to ODI in April-May, 2005.

VIN (*)	Vehicle Model	Vehicle Model Year	5th or TT	Incident date	Report or Claim Date	Description of the Failure - For brevity, ODI has edited the description provided by Monaco Coach to eliminate non-essential information regarding parts return, warranty coverage, etc
1KB311R242 EXXXXXXX	1233 Presidential	2002	5th	7/13/2004	5/18/2005	all 4 rims are leaking at welds.
1KB331N293 EXXXXXXX	1230 Ahmascape	2003	5th	1/6/2005	5/18/2005	3 chrome wheels are leaking or cracked
1KB311R273 EXXXXXXX	1233 Presidential	2003	5th	5/23/2005	5/25/2005	3 leaking rims
1KB311S284 EXXXXXXX	1233 Presidential	2004	5th	5/24/2005	5/25/2005	tire leaking down found rim broke inside and outside by weld
1KB311S255 EXXXXXXX	1233 Presidential	2005	5th	5/26/2005	5/26/2005	all 4 rims are leaking at the welds and are cracked.
4K0311N201 EXXXXXXX	1240 Medallion	2001	5th	5/23/2005	5/26/2005	bad RF wheel and another leaking ... has crack at weld
1KB311S293 EXXXXXXX	1233 Presidential	2003	5th	4/28/2005	5/31/2005	3 rd bad chrome steel wheel [sic] leaking at crack

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

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Attachment C  
Sheet 1 of 1

**Summary of Wheel Complaints indicating "cracked" or "broken" wheels installed in Monaco Coach Motor Home and Bus Chassis Recreational Vehicles based on Reports that Monaco Coach Provided to ODI in April-May, 2005.**

VIN (*)	Vehicle Model	Vehicle Model Year	Incident date	Report or Claim Date	Brief Description of the Failure Wheel Cracked or Completely Separated or Nuts backed off or Stud Damage
1RF42464132 XXXXXX	1918 Camelot	2003	?	5/2/2005	a RF wheel cracked
1RF42464452 XXXXXX	1915 Endeavor	2005	2/28/2005	5/2/2005	vibration ... found RRI wheel steel bent

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