

APR 07 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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RV Group
Fleetwood Enterprises
2970 Myers Street
P. O Box 7638
Riverside, CA 92513-7638

EA05-011
NVS-214gb

Subject: Effectiveness of Fleetwood Campaign 99V-277

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 Fleetwood Enterprises ("Fleetwood") that will assist ODI in this evaluation.

ODI's previous investigation, RQ00-001, pertaining to Fleetwood Campaign 99V-277 in 2000, addressed the effect that installing slide out units may have had on vehicle loading. The following request addresses (1) the effectiveness of Campaign 99V-277 as indicated by the failure rate of front tires that have occurred in Fleetwood vehicles after receiving the campaign remedy compared to Fleetwood vehicles that did not receive the campaign remedy and (2) Fleetwood's current strategies for selecting / specifying front tires installed in Fleetwood's Class "A" motor home vehicles.

ODI's research of past campaigns indicates that Fleetwood filed Defect Report 99V-277 on October 5, 1999. This campaign was intended to address front tire failures that had occurred within a 3,727 unit population of model year 1996-2000 Fleetwood American Eagle, American Dream, and American Tradition motor homes.

According to Fleetwood's October 5, 1999, Defect Report, each remedied vehicle was to receive "new larger capacity front tires," have the front axle weight distribution adjusted (if necessary), have a new certification label applied to the vehicle, and have each affected owner receive consumer education regarding the importance of tire maintenance, including rotation alignment, and tire inflation pressure.

ODI records indicate that Fleetwood filed their most recent quarterly Campaign Completion Status Report on January 17, 2001. This report indicates that 3,455 vehicles had been inspected and remedied indicating a 93% completion rate based on Fleetwood's (later revised) estimate that 3,734 ^(*) vehicles were affected.

^(*) Fleetwood amended the original estimate of 3,727 affected vehicles to include 18 Heritage vehicles and to eliminate eleven vehicles deemed "unreachable" due to export, theft, scrap, and the like.

Information Requested -

In order for my staff to further evaluate the effectiveness of Campaigns intended to address front tire failures, ODI is requesting certain information regarding the vehicles that were the subject of Campaign 99V-277.

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

- **Subject vehicle(s)**: all 1996-2000 Model Year Fleetwood American Eagle, American Dream, and American Tradition vehicles that Fleetwood addressed with Campaign 99V-277.
- **Subject components**: front tires installed as either original or replacement equipment in the subject vehicles.
- **Fleetwood Enterprises, Inc. ("Fleetwood")**: 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 Fleetwood (including all business units and persons previously referred to),

who are or, in or after 1999 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 due to unknown causes, abuse, 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 Fleetwood, 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 Fleetwood'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 99V-277 EFFECTIVNESS -

1. State the number of subject vehicles that Fleetwood addressed with Campaign 99V-277 in which Fleetwood intended and/or specified that one or both of the originally-installed right and left front tires be replaced with "new larger capacity front tires."
2. State the number of vehicles that Fleetwood has remedied to date by replacing one or both of the originally-installed right and left front tires with "new larger capacity front tires" as intended and/or specified by Campaign 99V-277.
3. State the number of front tire failures that have occurred in the subject vehicles addressed by Campaign 99V-277

- (a) Prior to having one of both front tires replaced with a larger capacity tire as intended/specified by Campaign 99V-277;
- (b) After vehicles had been remedied by having one or both of the front tires replaced with a new larger capacity front tire as prescribed by Campaign 99V-277;
- (c) In unresponsive vehicles (i.e. those vehicles that Fleetwood's Campaign 99V-277 identified as candidates for having one or both of the front tires replaced with a new larger capacity front tire but which had not been remedied prior to the tire failure due to misdirected / misplaced notices, unresponsive owners, etc.)

FRONT TIRE CAPACITY IMPROVEMENT – Campaign 99V-277

4. The following table summarizes the originally-installed front tires and recommended replacement front tires prescribed by Fleetwood's Recall Service Bulletin # 91015 for Campaign 99V-277.

Originally Installed Tire	Replacement Tire
275/70R22.5	275R80R22.5
265/75R22.5	275R70R22.5
255/70R22.5	275R70R22.5
245/75R22.5	275R70R22.5

For each of the originally installed front tire sizes (i.e. the four tire sizes listed above) that Fleetwood intended and/or specified be replaced with a new larger capacity front tire, provide a table that identifies:

- (a) the nominal size of the originally installed front tires (e.g. 275/70R22.5; 265/75R22.5; 255/70R22.5; and 245/75R22.5)
- (b) the recommended tire inflation pressure for the originally installed front tires;
- (c) the nominal size of the Campaign-replacement front tires (e.g. 275R80R22.5 and 275R70R22.5)
- (d) the recommended tire inflation pressure for the Campaign-replacement front tires;
- (e) an estimate of the increase in front tire capacity achieved for each of the above-listed (four) replacements by replacing the originally-installed front tire(s) when inflated to the originally recommended inflation pressure with the corresponding new larger capacity replacement front tire(s) when inflated to the Campaign-recommended inflation pressure.

5. ODI notes that Part 4 of Fleetwood Service Bulletin # 91015 specifies that certain vehicles require modification to the wheel well to accommodate the larger size 275/80R22.5 tires when replacing the originally-installed 275/70R22.5 tires.

- (a) Provide a summary of the number of vehicles that Fleetwood determined would require the wheel well modification described in Fleetwood Service Bulletin # 91015.

(b) Provide a summary of the number of vehicles whose wheel wells were modified as outlined by Fleetwood Service Bulletin # 91015.

(c) Other than the wheel well modifications performed to accommodate the larger size 275/80R22.5 tires as described in 5(a) and 5(b) above, briefly describe all other field modifications, if any, that Fleetwood made to the body or frame of the vehicles addressed by Campaign 99V-277 to accommodate the installation (i.e. provide clearance) for the new larger capacity replacement front tires being installed per Campaign 99V-277 and briefly describe which product lines, vehicle configurations and/or group(s) of vehicles, if any, required the described modifications.

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

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

This letter is being sent to Fleetwood 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. Fleetwood's failure to respond promptly and fully to this letter could subject Fleetwood 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 Fleetwood 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, Fleetwood does not submit one or more requested documents or items of information in response to this information request, Fleetwood 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.

Fleetwood's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by May 10, 2006. Please refer to EA05-011 in Fleetwood's response to this letter. If Fleetwood finds that it is unable to provide all of the information requested within the time allotted, Fleetwood must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Fleetwood 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 Fleetwood then has available, even if an extension has been granted.

If Fleetwood 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, Fleetwood 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. Fleetwood 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