



Driven to Explore

May 9, 2006

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Mr. Richard Boyd, Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Subject: Effectiveness of Fleetwood Campaign 99V-277
Ref: Office of Defect Investigation (ODI) File: EA05-011 (Country Coach)

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OFFICE OF DEFECT INVESTIGATION

Dear Mr. Boyd,

This letter has been prepared in response to your request for peer information on EA05-011, dated April 10, 2006 that will assist ODI in an investigation 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.

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.

Fleetwood has based the responses to questions 1, 2, 3, 4, and 5 upon a search of records at the facilities of Fleetwood Enterprises, or at subsidiary locations, where documents of the type that appear to be called for by the request can reasonably be expected to be found.

In completing these searches, it was first necessary to interpret the requests. Once the search was completed, documents were forwarded for review and these documents provide the basis for the responses contained in this reply.

The search that was conducted did not involve all personnel or offices of Fleetwood and its subsidiaries. Such a broad search would be unlikely to produce any significant additional information, because in the ordinary course of business information of this type is transmitted to the locations that have been searched. In addition, such a search could be extremely time-consuming and expensive.

Additionally, the search described above was conducted subsequent to receipt of your letter and should have resulted in the identification of information received or generated between the time the search was completed and the date of this response. Any such information has not been included. Please advise if you require more specific information about the nature or the scope of the search that we made.

CAMPAIGN 99V-277 EFFECTIVENESS

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".

Response

3745 motor homes

Sources are Fleetwood Enterprises records. The information was gathered April 21, 2006.

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.

Response

3736 motor homes

Sources are Fleetwood Enterprises records. The information was gathered April 21, 2006.

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 or both front tires replaced with a larger capacity tire as intended/specified by Campaign 99V-277;

Response

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- (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;

Response

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- (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.)

Response

2

FRONT TIRE CAPACITY - 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:

- the nominal size of the originally installed front tires (e.g. 275/70R22.5; 265/75R22.5; 255/70R22.5; and 245/75R22.5)
- the recommended tire inflation pressure for the originally installed front tires;
- the nominal size of the Campaign-replacement front tires (e.g. 275R80R22.5 and 275R70R22.5)
- the recommended tire inflation pressure for the Campaign-replacement front tires;
- 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

Response

Originally Installed Tire (4a)	Recommended Original Inflation Pressure (Pounds per square inch) (4b) *	Replacement Tire (4c)	Recommended Tire Inflation Pressure for Campaign Replacement Front Tire (pounds per square inch) (4d) *	Increase in Front Tire Capacity (4e)
275/70R22.5	115	275/80R22.5	115	8.5%
265/75R22.5	110	275/70R22.5	105	10.5%
255/70R22.5	90	275/70R22.5	100	21.5%
245/75R22.5	105	275.70R22.5	100	20.0%

* These pressures are specified at full gross vehicle weight and should be set to match the weight of the loaded motor home.

This information was gathered from Fleetwood Recall Service Bulletin #91015 and Goodyear Tire and Rubber inflation charts, as included in Fleetwood Recall Service Bulletin #91015, published in October 1999.

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.

Response

2317 motor homes. This information was gathered during April of 2006 by summarizing production volumes of the affected subject vehicles.

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

Response

2317 motor homes. This information was obtained during April of 2006.

- (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.

Response

A small number of mud flap adjustments were reported to have been required. These would be on the subject vehicles. This information was provided during April of 2006.

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.

Response

Fleetwood Enterprises, Inc., and its subsidiaries currently utilizes over 40 configurations of motor home chassis from 5 chassis manufacturers. The chassis manufacturers are:
Freightliner Customer Chassis Corporation of Gaffney, South Carolina
Spartan Chassis, Inc., of Charlotte, Michigan
Workhorse Custom Chassis of Highland Park, Illinois
Ford Motor Company of Dearborn, Michigan
General Motors Corporation of Detroit, Michigan

Current tires equipped to the chassis are from:
Goodyear Tire & Rubber Company of Akron, Ohio
Michelin North America, Inc., of Greenville, South Carolina
Continental Tire North America, Inc., of Charlotte, North Carolina

The chassis manufacturers are responsible for tire offerings and specifications.

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

Response

The following is excerpted from a 2006 Fleetwood motor home owner's manual:

"For safety and maximum tire life, vehicle speeds must be proper, proper inflation pressure must be maintained, and tread depth and wear must be monitored. Properly inflated and maintained tires

also contribute to overall motor home stability and safety. Refer to the tire section in your *Chassis Operator's/Owner's Guide/Manual* or any tire manufacturer's information that may be provided in your *Owner's Information Package* for information on maintenance and tire care. If no information is provided please contact your local tire manufacturer's location for advice."

"The maximum cold inflation pressures are stated on the tire sidewall. The recommended maximum tire inflation pressure for this coach is shown on the Federal Certification Tag located on the sidewall near the driver's seat. To maximize tire performance, consult with the tire manufacturer's guidelines or *Chassis Operator's/Owner's Guide/Manual* for recommended tire inflation pressure."

The following is excerpted from the Goodyear Tire Warranty:

"Tire Service Life - Tires are designed and built to provide many thousands of miles of excellent service. For maximum benefit, tires must be maintained properly to avoid tire damage that may result in removal from service before the tread is worn down to minimum depth."

"It is not practical to accurately predict the service life of any specific tire in chronological time since service conditions vary widely. The serviceability of a tire over time is a function of the storage and service conditions (inflation pressure, load, speed, road hazard injury, etc.) to which a tire is subjected. Consumers should not rely solely on the appearance of the tire, but should be aware of any change in dynamic performance such as increased air loss, noise or vibration, which could be a sign to remove the tire. Therefore, it is essential to have tires, including spares, inspected regularly (at least monthly) for proper inflation pressure, damage and tread wear."

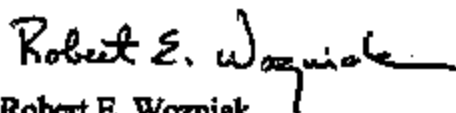
8. Describe Fleetwood's current policy and design guidelines for specifying / selecting front tires based on speed rating.

Response

Please see response to number 6.

If you have any additional questions please contact myself.

Sincerely,



Robert E. Wozniak
Director of RV Product Compliance
Recreational Vehicle Group