



MONACO
COACH CORPORATION

9/1/05

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 25, 2005

Richard Boyd, Chief
Medium & Heavy Duty Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street SW
Washington, DC 20590

RE: NVS-214gtb
PE05-026

Dear Mr. Boyd:

This letter and accompanying materials are the response of Monaco Coach Corporation ("Monaco Coach" or "the Company") to your July 18, 2005 request for information letter directed to the undersigned in the above referenced matter.

Monaco Coach's responses are as follows:

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.

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 1-A Monaco Coach Production Information Powered Units.

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.

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 1 – B Monaco Coach Production Information Towable Units.

Provide the table in Microsoft Access or Excel 2000, or 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.

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 2 Monaco Coach Wheel Information.

- 3.** For each wheel part number listed in response to request No. 2, provide a table that identifies:
- a. Monaco Coach's part number;
 - b. The name of the wheel supplier;
 - c. The supplier part number;
 - d. The wheel rating;
 - e. The number of mounting holes;
 - f. The mounting bolt circle diameter;
 - g. The nominal size of the mounting holes; and
 - h. A brief description of the material composition and construction of the wheel (e.g. cast aluminum, fabricated steel, fabricated chrome plated steel, etc).

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 3 Monaco Coach Wheel Specification table.

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 complaints;
- 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.

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 4 – A Wheel Complaint Summary Data Powered Units.

Provide this information in Microsoft access or excel 2000, or 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 complaints;

- 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 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.

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 4 - B Wheel Complaint Summary Data Towable Units. There is a second sheet with explanation to 1 coach on 4-B-e.

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, filed 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.

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 5 – A Wheel Complaint Details Powered Units.

Provide this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Numbers 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 reports, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle 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."

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 5 – B Wheel 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).

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 6 - A Warranty Claims Powered Units.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "Request Number 6-A, Warranty Information, Power 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, Power Units."

Monaco Coach Response is in Excel spreadsheet labeled as Request Number 6 - B Warranty Claims 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.

Monaco Coach Response to # 7.

We retrieved all consumer complaints by model year requested and then filtered data by TREAD code for wheels. The labor operations numbers have the TREAD code pre-assigned to the background so when searching TREAD code it would find all applicable labor/ job operation codes.

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.

Monaco Coach Response to Warranty Coverage.

- (a) ***Diesel-powered motorhomes: all models and model years are covered by the Company's Roadmaster Chassis Limited Warranty for a period of 3 years or 36,000 miles, whichever comes first. Exclusions include "component parts covered by their own manufacturer's warranty, including by way of example the engine, transmission, tires, tubes, batteries, exhaust system and the emission control systems; . . . Component part manufacturers issue limited warranties covering those portions of the Roadmaster Chassis not covered by the Limited Warranty provided by [the Company]."***
- (b) ***Gas-powered motorhomes: all models and model years were built on either Ford or Workhorse chassis and any warranty coverage of chassis items, including running gear, would have been pursuant to those manufacturer's limited warranties. Monaco Coach issued a limited warranty with a coverage period of 12 months or 24,000 miles, whichever comes first, that excludes the chassis.***
- (c) ***Towables: all models and model years are covered by the Company's limited warranty for a period of 12 months. Exclusions include ". . . components covered by their own manufacturer's warranty, including by way of example the tires, . . ."***

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 present.

Monaco Coach Response to Number 8 is in Excel labeled "Request Number 8 Replacement Part Sales Info".

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;

Tredit Tire & Wheel stopped providing any Chrome Steel Wheels to Monaco Coach's production facilities and Parts warehouse on approximately July 15, 2005.

- b. A detailed description of the modification or change;

Tredit Tire & Wheel has provided a Cast Aluminum Wheel to replace the Chrome Steel Wheel application.

- c. The reason(s) for the modification or change;

It is the Company's understanding that Tredit Tire & Wheel decided that the change should be made until its supplier was in a position to provide a different Chrome Steel Wheel tested and approved for the intended application.

- d. The part numbers (service and engineering) of the original component;

These are the same as listed on 3 – A spreadsheet For Chrome Steel Wheels.

- e. The part number (service and engineering) of the modified component;

These are the same as listed on 3 -A spreadsheet as the Aluminum Wheels.

- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;

The Company's production with the original component stopped on approximately July 15, 2005. At that time, all units in production and released but unshipped units were equipped with new Aluminum Wheels.

- g. When the modified component was made available as a service component; and,

It became available in the Spring of 2005 and then in June / July 2005 as a replacement for the Chrome Steel Wheels.

- h. Whether the modified component can be interchanged with earlier production components.

The Aluminum Wheel is interchangeable, requiring only a new center hub cover and lug nuts.

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.

No modification or change is currently planned.

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.

Monaco Coach has requested that our wheel and tire supplier, Tredit Tire & Wheel, recommend to Monaco any improvement or necessary changes. This is consistent with historical practice of utilizing the expertise of our tire and wheel supplier.

9. 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 requested deviations.

There have been no deviations or modifications. Monaco Coach specified intended GAWR and GVWR for the applications and requested tire and wheels to meet these specifications in all respects.

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.

Consistent with historical practice, the Company has been working with Tredit Tire & Wheel. Based on the tire and wheel expertise of Tredit and Tredit's superior access to the entire market for which it has supplied such wheels, Monaco Coach is relying on Tredit to perform testing and share its test results and analyses with the Company.

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.

Monaco Coach is not in possession of any inspection reports. The Company has attended visual inspections with Tredit Tire & Wheel and its supplier, but to the Company's knowledge no written reports resulted from these inspections. Monaco Coach has been waiting for further information from Tredit.

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.

It is the Company understanding that Tredit Tire & Wheel has scheduled test sessions to check wheel applications and stress in different situations and loads. Monaco Coach is awaiting results of these tests to work with Tredit in future designs and applications.

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.

Monaco Coach is presently unaware of any documents responsive to this request.

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.

Monaco Coach has not issued any documents to any repair facilities and has not drafted any procedure. The Company is waiting for pending test results and recommendations from Tredit Tire & Wheel.

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 vehicle and (b) "towable" vehicles, including:
 - a. The failure mechanism(s);

A possible cause is cold welds and contamination of welds from assembly process. There may also be also tolerance issues of center section fit to outer hoop.

b. The failure modes(s),

From Monaco's observations, no failures appear to have been identical in relationship to travel, load or time of failure.

c. The risk to motor vehicle safety that posed

The risk to motor vehicle safety is the potential of a lost wheel could result in loss of control of the towed vehicle.

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.

Warning to the vehicle operator would be a slight disturbance of vehicle handling. An outside observer would notice a wheel starting to wobble or come loose.

17. Furnish Monaco Coach's assessment of a wheel that is cracked or broken through the rim resulting in a loss of tire pressure in the subject components, when installed in (a) powered vehicles and (b) "towable" vehicles including:

a. The failure mechanism(s);

It is possibly caused by an overheated weld which has crystallized steel and is causing porous metal fatigue cracks.

b. The failure mode(s),

The rim cracks open and air leaks out.

c. The risk of motor vehicle safety that posed

The risk of motor vehicle safety would be potential from damage of a failed tire run low on air pressure and loss of control of the towed vehicle.

- 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. Including a discussion about the likelihood that a persistent loss of air pressure would be evident to the operator.

Constant low tire pressure and finding it necessary to frequently add air pressure to the tire.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Zucker', with a long horizontal flourish extending to the right.

Chuck Zucker
Technical Coordinator Supervisor
Monaco Coach Corporation