



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

SEP 15 2006

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Joyce Skinner
Director of Aftermarket Services
Starcraft R V, Inc.
P. O. Box 458
Topeka, IN 46571

PE06-036
NVS-214gtb

Subject: Wheel Separations / Axle Breakage

Dear Ms. Skinner,

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) opened a Preliminary Evaluation (PE06-036) on September 7, 2006, to investigate wheel separations.

Note that although ODI is primarily concerned about wheel separations that have occurred due to axle cracking, breaking, and/or fracturing, this inquiry also addresses wheel separations that may have occurred due to other causes.

On September 1, 2006, in response to ODI's request, Lippert Components, Inc. provided ODI with a list of reported axle fractures affecting several vehicle manufacturers, including Starcraft RV. Lippert informed ODI of two incidents that allegedly occurred in a single Starcraft towable recreational vehicle equipped with axles rated at 3500 lbs. (each) and identified by axle serial numbers 204394 and 212634.

In order for my staff to evaluate this issue, ODI is requesting Starcraft RV to provide the following:

- (1) Prompt notification to ODI of all newly-reported incidents of wheel separations including, but not limited to axle cracking, breaking, or fracturing that are reported to Starcraft; and

(2) Responses to certain requested information.

(1) Newly Reported Incidents-

ODI requests that Starcraft notify ODI promptly of all newly reported (1) wheel separation incidents regardless of suspected cause and (2) incidents of cracked, broken, or fractured axles, whether or not the incident resulted in a complete wheel separation, which has been reported to Starcraft since September 1, 2006. ODI requests Starcraft to notify ODI within 48 hours when Starcraft learns of a wheel separation or an incident of a cracked, broken, or fractured axle, whether or not confirmed and regardless of the vehicle age and/or suspected cause.

This request is ongoing and terminates on December 31, 2006, but may be extended if circumstances warrant.

Each notification should, at a minimum, provide the information listed in the table below. ODI is providing a copy of the required format to Starcraft by e-mail. Starcraft should report incidents by e-mail to **tom.bowman@dot.gov** (phone 202-366-2583). The notification should provide as much of the requested information as possible. Timeliness is critical. Any of the requested information that is not available at the time of the initial incident notification must be provided as soon as it becomes available.

No.	Information
1	Date of Report
2	Incident Date
3	VIN
4	Vehicle OEM (Mfr)
5	Model Year
6	Vehicle Make
7	Vehicle Model
8	Veh Mfg Date
9	Vehicle Purchase Date

No.	Information
17	Trailer Mileage at Incident
18	Injury or Fatality (specify and describe)
19	Property Damage (describe)
20	Location of Vehicle
21	Axle position on Vehicle (forward or rearward)
22	Wheel Separation (Complete or Partial)
23	Describe Suspected Cause (Axle Fracture or Damage). Provide further description if other than axle fracture.
24	Axle fracture/damage side (roadside or curbside)
25	Was the fractured end recovered ? (yes or no)

10	Owner's Name
11	Owner's Street Address
12	Owner's State
13	Owner's ZIP code
14	Owner's Phone Number
15	Location of Incident
16	Description of Incident

26	Disposition of Failed Axle / Broken End / Other Components
27	Axle Manufacturer
28	Axle Series or Family
29	Axle Model
30	Axle Serial Number
31	Axle Build Date
32	Comments

(2) Information Requested -

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

- **Subject vehicles:** all towable recreational vehicles equipped with one or more of the subject components manufactured by Starcraft RV since January 1, 2006, to date, and sold or leased in the United States.
- **Subject components:** trailer axle assemblies.
- **Starcraft R.V., Inc. ("Starcraft"):** 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 to a consultant) by or under the control of Starcraft (including all business units and persons previously referred to), who are or, in or after 2006 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;
 - 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; or

- e. Management of any litigation involving Starcraft products that relate to the alleged defect.
- **Alleged defects:** (1) Any wheel separation due to any cause and (2) any cracking, breaking, and/or fracturing of the axle assembly.
 - **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 Starcraft, 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.

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. 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 Starcraft’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 2003 electronic format.

1. Provide a table that identifies the total number of subject vehicles (towable recreational vehicles) that Starcraft has manufactured for sale or lease in the United States by (a) vehicle model (b) model year; and (c) month of production since January 1, 2006.

Identify the installed axle assembly by axle manufacturer, axle model and/or axle series for each of the vehicle models listed.

Provide the table in Microsoft Access 2003 or Excel 2003, or a compatible format, entitled “PE06-036 Request Number One – Total Production, Starcraft RV.”

2. Provide a table that identifies the number of subject vehicles equipped with Lippert axle assemblies that Starcraft has manufactured for sale or lease in the United States by (a) vehicle model; (b) model year; and (c) month of production since January 1, 2006.

Identify the installed axle assembly by axle model and/or axle series for each of the vehicle models listed.

Provide the table in Microsoft Access 2003 or Excel 2003, or a compatible format, entitled "PE06-036 Request Number Two – Production of RVs Equipped with Lippert Axles, Starcraft RV."

3. State the number of each of the following, received by Starcraft, or of which Starcraft is otherwise aware, which relate to, or may relate to, the alleged defects in the subject vehicles:
 - a) Consumer complaints, including those from fleet operators;
 - b) Field reports, including dealer field reports;
 - c) Reports involving an injury or a fatality, based on claims against the manufacturer involving a death or injury, 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 Starcraft is or was a party to the arbitration; and,
 - f) Lawsuits, both pending and closed, in which Starcraft is or was a party.

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple reports of the same incident are 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, etc.).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and Starcraft's assessment of the problem, with a summary of the significant underlying facts and evidence.

For items "e" and "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 the table in Microsoft Access 2003 or Excel 2003, or a compatible format, entitled "PE06-036 Request Number Three – Complaint Information, Starcraft."

4. Separately, for each item (complaint, report, claim, notice, or matter) identified in response to Request No. 3 above, state the following information:
 - a) Starcraft's file number or other identifier used;
 - b) The VIN of the affected Starcraft RV;
 - c) The model and model year of the Starcraft RV;
 - d) The date that the Starcraft RV was manufactured;
 - e) The category of the item, as identified in Request No. 3 (i.e., consumer complaint, field report, etc.);
 - f) The individual or fleet owner, address, and telephone number;
 - g) The manufacturer of the affected axle assembly;
 - h) The model of the affected axle assembly;
 - i) The serial number of the affected axle assembly;
 - j) The date of the incident;
 - k) The date of the report or claim;
 - l) A description on the incident (e.g. whether the wheel completely or partially separated;
 - m) A description of the probable cause (e.g. whether the axle had completely or partially fractured or whether some other cause is alleged. If the separation was due to a cause other than the axle fracturing, provide a description of the probable cause);
 - n) Whether property damage is alleged;
 - o) Number of alleged injuries, if any;
 - p) Number of alleged fatalities, if any; and
 - q) The disposition of the affected axle assembly or assemblies or related components (e.g. "no problem found," repaired in the field, returned to supplier for analysis, examined by Starcraft representatives, scrapped in the field, etc.)

Provide the table in Microsoft Access 2003 or Excel 2003, or a compatible format, entitled "PE06-036 Request Number Four – Complaint Details, Starcraft."

5. State, by model and model year or calendar year, a total count for all of the following categories of claims, collectively, that have been paid by Starcraft to

date that relate to, or may relate to, the alleged defect in the subject components identified in response to Request No.1: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign; and pre-delivery failures^(*).

(*) Starcraft's response to Request No. 5 should include all incidents of the alleged defect that have occurred prior to sale to the consumer (i.e. during vehicle assembly, in transit to selling dealer, at dealer's location, etc.).

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

- a) Starcraft's claim number;
- b) The VIN of the affected Starcraft RV;
- c) The model and model year of the Starcraft RV;
- d) The date that the Starcraft RV was manufactured;
- e) The name, address, and telephone number of the owner or fleet name (and fleet contact person);
- f) The manufacturer of the affected axle assembly;
- g) The model of the affected axle assembly;
- h) The serial number of the affected axle assembly;
- i) Incident date;
- j) Report or claim date;
- k) Whether a complete or partial fracture is alleged;
- l) Whether property damage is alleged;
- m) Number of alleged injuries, if any;
- n) Number of alleged fatalities, if any;
- o) Repair or replacement date;
- p) Repairing or replacing dealer's or facility's name, telephone number, city and state or ZIP code;
- q) Labor operation number;
- r) Problem code;
- s) Replacement part number(s) and description(s);
- t) Concern stated by customer;
- u) Verbatim comments made, if any, by any dealer/technician relating to the claim and/or repair; and
- v) Whether the axle assembly was inspected or analyzed by Starcraft or Starcraft's employees, representatives, or agents.

Provide the table in Microsoft Access 2003 or Excel 2003, or a compatible

format, entitled "PE06-036 Request Number Five – Warranty and Pre-delivery Performance Information, Starcraft."

6. Describe in detail the search criteria used by Starcraft to identify the claims identified in response to Request No. 5, 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.
7. Describe the normal warranty coverage terms that Starcraft provided for the subject components.
8. Describe any extended warranty coverage option(s) that Starcraft offered for the subject components and state by option, model, and model year, the number of components that are covered under each such extended warranty.
9. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions"), including, but not limited to, pre-productions tests, that relate to, or may relate to, the alleged defect in any axle assemblies installed in vehicles identified in response to Request No. 1 that have been conducted, are being conducted, are planned, or are being planned by, or for, Starcraft, its suppliers, customers, dealers, and/or its representatives or agents. 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 planning and for conducting the action; and
 - (f) A summary of the actions, assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations and/or conclusions resulting from the action.

Provide this information in Microsoft Access 2003, Excel 2003, Word 2003 or a compatible format, entitled "PE06-036 Request Number Nine – Starcraft Product Investigations/Evaluations."

10. Furnish Starcraft's assessment of the alleged defect in the subject vehicles, including:

- (a) The causal or contributory factor(s);
- (b) The failure mechanism(s);
- (c) The failure mode(s);
- (d) The risk to motor vehicle safety posed by the alleged defect;
- (e) What warnings, if any, the operator and the other persons, whether inside or outside of the vehicle, would have that the alleged defect was present and/or whether the subject component was malfunctioning.

This letter is being sent to Starcraft 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. Starcraft's failure to respond promptly and fully to this letter could subject Starcraft 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 \$6,000 per day, with a maximum of \$16,375,000 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 fully to ODI information requests.

If Starcraft 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, Starcraft does not submit one or more requested documents or items of information in response to this information request, Starcraft 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.

Starcraft's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office **October 16, 2006**.

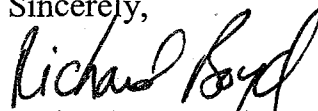
Please refer to PE06-036 in Starcraft's response to this letter. If Starcraft finds that it is unable to provide all of the information requested within the time allotted, Starcraft must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Starcraft 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 Starcraft then has available, even if an extension has been granted.

If Starcraft 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, Starcraft 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, National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Starcraft is required to submit two copies of the documents containing allegedly confidential information (accept 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