



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

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

DEC 14 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ron Post
Product Safety Administrator
Winnebago Industries, Inc
P.O. Box 152
Forest City, IA 50436

NVS-214njs
PE06-058

Dear Mr. Post:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE06-058) to investigate allegations of inadvertent extension of the "slide-out cooler" on certain Navion recreational vehicles and to request certain information.

This office received three Vehicle Owner's Questionnaire's reporting inadvertent extension of the slide-out cooler, while the vehicle was in motion. Copies of these reports are enclosed for your information.

ODI has multiple concerns about the inadvertent deployment of a vehicle slide-out during normal highway operations. CFR 49 does not specifically address recreational vehicle slide-out compartments. Recreation Vehicle Industry Association (RVIA) also doesn't address this component directly. However, a survey of several manufacturers and models reveals that there are safer designs used today. The slide-out option is relatively new and is continually being improved by manufacturers. This is evident in Navion's 2007 model. ODI believes a safety latch, similar to those required for engine compartment hoods is appropriate in an application such as this. As a minimum it needs to be obvious when a compartment is not secured or ready for travel.

Unless otherwise stated in the text, the following definitions apply to this information request:

- **Subject vehicles:** all MY 2006 Itasca Navion recreational vehicles incorporating a "slide-out cooler" feature and manufactured by Winnebago for sale or lease in the United States.
- **Subject component:** slide-out cooler assembly and related equipment



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888-327-4236

- **Manufacturer:** Winnebago Industries, Inc (Winnebago), 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 Winnebago (including all business units and persons previously referred to), who are or, in or after 2004.
- **Alleged defect:** any unintentional extension, separation, or movement of the slide-out cooler component system while the vehicle is in motion.
- **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 Winnebago, 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.

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 Winnebago has previously provided a document to ODI, Winnebago 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 Winnebago's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State the number of subject vehicles Winnebago has manufactured for sale or lease in the United States.
2. State the number and provide copies of each of the following, received by Winnebago, which relate to, or may relate to, the alleged defect in the subject vehicles:
 - a. Consumer / fleet complaints;
 - b. Field reports;
 - c. Reports involving a crash, injury, or fatality;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings where Winnebago is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Winnebago is or was a defendant or codefendant.

For subparts "a" through "f," 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 in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint). For "d" through "f," provide a summary of the event.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. Vehicle VIN;
 - b. Vehicle's owner or fleet name (and fleet contact person), address, and telephone number;
 - c. Vehicle's mileage at time of incident, if known;
 - d. Incident date;
 - e. Manufacturing Plant;
 - f. Date of manufacture; and
 - g. Date warranty coverage commenced.

If desired you may submit items "a" through "g" on an electronic disk. Excel or Microsoft Access 2000, are the preferred formats.

4. State the total count for all warranty claims that have been paid by Winnebago to date that relates to, or may relate to, the alleged defect in the subject vehicles.
5. Provide copies of any service or technical bulletins, product improvement campaign announcements, or advisories, and all other communications concerning the alleged defect that Winnebago has issued or is considering issuing to owners, fleets, dealers, zone offices, or field offices. If Winnebago has drafted any such communications, furnish a copy of the draft. For any such communication that has been issued, state the date on which the communication was sent, and the model of vehicle to which the communication pertained. For each such communication:
 - a. Provide a complete chronology, listing all activities or events, including, but not limited to, incidents involving the subject component, which led Winnebago to issue the communication;
 - b. Provide a listing (in chronological order) of all testing through which the need for the communication was identified and/or assessed, even if the testing was being conducted for another purpose. Please provide a copy of all relevant information from each listed test; and
 - c. State the number of repairs and/or replacements paid for by Winnebago that resulted from the communication identified. List your response by repairing dealer (and included the dealer's name, address, and telephone number).
6. If someone other than Winnebago manufactures the slide-out equipment/system, identify all suppliers of the slide-out equipment to Winnebago, including company name, address, telephone number and contact person.
7. Describe all modifications or changes made by, or on behalf of, Winnebago in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production 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 on which the change was incorporated into vehicle production;
 - b. A detailed description of the change;
 - c. The reason(s) for the 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, inventory(s) 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 Winnebago is aware of which may be incorporated into vehicle production within the next 120 days.

8. Provide a complete description of the slide-out assembly. Include operating instructions, safety features, and design considerations. In particular, explain how the subject component remains in the closed position when the vehicle is in motion. Describe the "locking system" which prevents an inadvertent slide out extension during over the road operations. Supplement this with any engineering drawings, schematics or pictures necessary to fully describe the system.
9. Furnish Winnebago's assessment of the alleged defect in the subject vehicle, 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 that it poses; and
 - e. What warnings, if any, the operator and other people both inside and outside the vehicle would have that the alleged defect was occurring?

This letter is being sent to Winnebago 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. Winnebago's failure to respond promptly and fully to this letter could subject Winnebago 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. See 49 CFR 578.6 (as amended by 71 Fed. Reg. 28279 (May 16, 2006)). This includes failing to respond to ODI information requests.

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

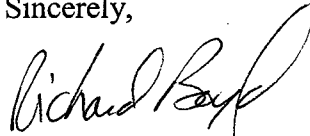
Winnebago's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **February 2, 2007**. Please refer to PE06-058 in Winnebago's response to this letter. If Winnebago finds that it is unable to provide all of the information requested within the time allotted, Winnebago must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Winnebago 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 Winnebago then has available, even if an extension has been granted.

If Winnebago 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, Winnebago 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 (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Winnebago 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 Nate Seymour of my staff at (202) 366-6965.

Sincerely,



Richard Boyd, Chief
Med/Heavy Duty Vehicle Division
Office of Defects Investigation

Enclosures: 3 VOQs



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

DOT Auto Safety Hotline
Vehicle Owner's Questionnaire
To Report Vehicle Safety Defects
1-888-DASH-2-DOT
(1-888-327-4236)
INTERNET: www.nhtsa.dot.gov/hotline

FOR AGENCY USE ONLY 100148

Date Received

08-JUN-2006

Repository Reference No.
10159324**OWNER INFORMATION (Type or Print)**

Name

Address

City

Daytime Telephone Number

E-mail Address

Evening Telephone Number

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES NO
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

Signature of Owner

Date

VEHICLE INFORMATION

17 digit Vehicle Identification Number Located at bottom of windshield on driver's side

Make
ITASCAModel
NAVIONModel Year
2006

Date Purchased

Dealer's Name and Telephone Number

Engine:
No: CylindersFuel Type:
Diesel

Original Owner

Dealer's City

State

Zip Code

Transmission Type

AUTOMATIC

 Antilock Brakes Cruise Control

Powertrain

REAR WHEEL DRIVE

Vehicle Component Code

170000 LATCHES/LOCKS/LINKAGES

Multiple Failure: 2

FAILED COMPONENT(S)/PART(S) INFORMATIONIncident Date(s)
28-MAY-2003Failure Mileage
2900Failure Speed
55**ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE**

Tire Make

Tire Model (Name or Number)

Tire Size (Example P215/65R15)

DOT No. (Example: DOTM19ABC036)

 Original Equipment
 Prior Repair

Failure Location:

Tire Component Code

Tire Failure Type

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE

Make:

Date Manufactured:

Model No./Name:

Seat Type:

Installation System:

Child Seat Component Code:

Failed Part:

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies).)

Crash

 Yes No

Fire

 Yes No

Number of Persons Injured

Number of Deaths

Reported to Police

N

Narrative Description of Incident(S), Crash(es), and Injury(ies).

Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e, parts repaired or replaced (and if old part is available).

THE 100LB OUTSIDE STORAGE CONTAINER LOCATED ON THE PASSENGER SIDE OF MY ITASCA NAVION, H MODEL HAS SLID OUT TO THE OPEN POSITION TWICE WHILE DRIVING. THIS IS A SAFETY ISSUE THAT REQUIRES A FIX BEFORE SOMEONE IS SERIOUSLY INJURED. *JB

Include, if available: Police/Fire Department Report, Photos, and Repair Invoice.

ATTACH ADDITIONAL SHEETS IF NECESSARY

The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond this questionnaire. Your response may be used to assist the NHTSA in determining whether a Manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.



U.S. Department of Transportation
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DOT Auto Safety Hotline
Vehicle Owner's Questionnaire
To Report Vehicle Safety Defects
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(1-888-327-4236)
INTERNET:www.nhtsa.dot.gov/hotline

FOR AGENCY USE ONLY 100148

Date Received

16-APR-2006

Repository

Reference No.
10155428

OWNER INFORMATION (Type or Print)

Name

Address

City

Daytime Telephone Number

E-mail Address

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES NO
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.
Signature of Owner _____ Date ____/____/____

VEHICLE INFORMATION

17 digit Vehicle Identification Number Located at bottom of windshield on driver's side

BLT 10-3-05

Make

ITASCA

Model

NAVION

Model Year

2006

Date Purchased
21-OCT-05

Dealer's Name and Telephone Number

Engine:

No: Cylinders 5

Fuel Type:

Diesel

Original Owner

Dealer's City

State

Zip Code

Transmission Type

AUTOMATIC

Antilock Brakes

Cruise Control

Powertrain

REAR WHEEL DRIVE

Vehicle Component Code

170000 LATCHES/LOCKS/LINKAGES

Multiple Failure: 1

FAILED COMPONENT(S)/PART(S) INFORMATION

Incident Date(s)
30-MAR-2006

Failure Mileage
1647

Failure Speed
15

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE

Tire Make

Tire Model (Name or Number)

Tire Size (Example P215/65R15)

DOT No. (Example: DOTM19ABC036)

Original Equipment
 Prior Repair

Failure Location:

Tire Component Code

Tire Failure Type

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE

Make:

Date Manufactured:

Model No./Name:

Seat Type:

Installation System:

Child Seat Component Code:

Failed Part:

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies).)

Crash

Yes No

Fire

Yes No

Number of Persons Injured

0

Number of Deaths

0

Reported to Police

Y

Narrative Description of Incident(S), Crash(es), and Injury(ies).

Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e. parts repaired or replaced (and if old part is available).

2006 ITASCA NAVION UNDERCARRIAGE STORAGE BIN LATCH DID NOT HOLD WHILE DRIVING. BIN SLID OPEN AND HIT TREE, SHEARING OFF THE STORAGE BIN AND LOWER SIDE PANELS. *NM

Include, if available: Police/Fire Department Report, Photos, and Repair Invoice.

ATTACH ADDITIONAL SHEETS IF NECESSARY

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INTERNET:www.nhtsa.dot.gov/hotline

FOR AGENCY USE ONLY 100148

Date Received

01-NOV-2005

Repository

Reference No.
10141433

OWNER INFORMATION (Type or Print)

Name

Address

City

Vehicle Identification Number

E-mail Address

Evening Telephone Number

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES NO
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

Signature of Owner _____ Date ____/____/____

VEHICLE INFORMATION

17 digit Vehicle Identification Number Located at bottom of windshield on driver's side

Make

ITASCA

Model

NAVION

Model Year

2006

Date Purchased
03-OCT-05

Dealer's Name and Telephone Number
LAZY DAYS

Engine:
No. Cylinders 5

Fuel Type:
Other

Original Owner

Dealer's City
TAMPA

State
FL

Zip Code

Transmission Type
AUTOMATIC

Antilock Brakes
 Cruise Control

Powertrain
REAR WHEEL DRIVE

Vehicle Component Code
170000 LATCHES/LOCKS/LINKAGES

Multiple Failure: 1

FAILED COMPONENT(S)/PART(S) INFORMATION

Incident Date(s)
28-OCT-2005

Failure Mileage
3000

Failure Speed
20

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE

Tire Make

Tire Model (Name or Number)

Tire Size (Example P215/65R15)

DOT No. (Example: DOTM19ABC036)

Original Equipment
 Prior Repair

Failure Location:

Tire Component Code

Tire Failure Type

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE

Make:

Date Manufactured:

Model No./Name:

Seat Type:

Installation System:

Child Seat Component Code:

Failed Part:

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies).)

Crash

Yes No

Fire

Yes No

Number of Persons Injured

0

Number of Deaths

0

Reported to Police

N

Narrative Description of Incident(S), Crash(es), and Injury(ies).
Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e, parts repaired or replaced (and if old part is available).

THERE IS NO VISUAL INDICATION WHETHER THE EXTERIOR "COOLER" STORAGE AREA IS LATCHED OR UNLATCHED. IF UNLATCHED, STORAGE AREA CAN EXTEND WHILE DRIVING, ENDANGERING PEDESTRIANS, BICYCLISTS, OR CAUSING PROPERTY DAMAGE. *NM

Include, if available: Police/Fire Department Report, Photos, and Repair Invoice.

ATTACH ADDITIONAL SHEETS IF NECESSARY

The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond this questionnaire. Your response may be used to assist the NHTSA in determining whether a Manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.