



March 3, 2006

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Fleetwood Enterprises, Inc.
2970 Meyers St. P.O. Box 7638
Riverside, CA 92513-7638
p: 951-351-3814 / f: 951-353-7032

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

Dear Mr. Boyd,

This letter has been prepared in response to your Preliminary Evaluation PE06-005, dated January 24, 2006, to investigate reported incidents of "Alleged Inadvertent Deployment of Slide-Outs Rooms During Normal Highway Operations". Please note this is a two-section response. One response for the Riverside based Recreational Vehicle Group and one response for the Somerset based Folding Trailer Division. This response is separate due to the nature of the product, manufacturing technologies, warranty reporting system, and customer contact management.

1. State, by model and model year, the number of subject vehicles Fleetwood has manufactured for sale or lease in the United States.

Response

Refer to document 6

2. State the number and provide copies of each of the following, received by Fleetwood, which relate to, or may relate to, the alleged defect in the subject vehicles:

For subparts "a" through "g" 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 "e" through "g", provide a summary of the event.

Response

- a. Consumer / fleet complaints
Refer to document 7 and 7A for count and copies
- b. Field reports;
0 reports pertaining to (b)
- c. Reports involving a crash, injury, or fatality;
0 reports pertaining to (c)
- d. Reports involving a fire;
0 reports pertaining to (d)
- e. Property damage claims;
0 reports pertaining to (e)
- f. Third-party arbitration proceedings where Fleetwood is or was a party to the arbitration;
and
0 reports pertaining to (f)

- g. Lawsuits, both pending and closed, in which Fleetwood is or was a defendant or codefendant.
0 reports pertaining to (g)

Fleetwood has based the responses to questions 2, 3 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.

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 model and model year;
- d. Slide-out(s) location(s), example: Bedroom/Passenger side, Living Room/Driver side, etc);
- e. Vehicle's mileage at time of incident, if known;
- f. Incident date;
- g. Manufacturing Plant;
- h. Date of manufacture; and
- i. Date warranty coverage commenced.

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

Response

Refer to attachment 7A for items (a) through (i)

4. State, by model and model year, a total count for all warranty claims that have been paid by Fleetwood to date that relates to, or may relate to, the alleged defect in the subject vehicles.

Response

Refer to document 8

5. Provide copies of any service or technical bulletins, product improvement campaign announcements, or advisories, and all other communications concerning the alleged defect that Fleetwood has issued or is considering issuing to owners, fleets, dealers, zone offices, or field offices. If Fleetwood 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 Fleetwood 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 Fleetwood that resulted from the communication identified. List your response by repairing dealer (and include the dealer's name, address, and telephone number).

Response

0 reports pertaining to items (a) through (c)

6. If someone other than Fleetwood manufactures the slide-out equipment/system, identify all suppliers of the slide-out equipment to Fleetwood, including company name, address, telephone number and contact person. If multiple suppliers are used, identify the supplier of equipment for each Fleetwood model and slide-out location.

Response

Norco Industries, Inc
532236 Country Road 13
Elkhart, IN 46514
Bernie Garceau
Travel Trailer Dinette, bed, & sofa
Refer to document 3

Lippert Components, Inc
2766 College Ave.
Goshen, IN 46528
Jason Lippert
Travel Trailer Main Slide
Refer to document 3B

Power Gear
1217 E. 7th Street
Mishawaka IN 46544
Martin Palmer
All slide locations all products
Refer to document 9

Happijac
505 N. Kays Dr.
Kaysville, UT 84037
(801) 544-2585
Truck Camper Bed and dinette slide

No current contact point

No drawings or installation guides for this product available from vendor

7. Describe all modifications or changes made by, or on behalf of, Fleetwood 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 Fleetwood is aware of which may be incorporated into vehicle production within the next 120 days.

Response

No modifications or changes have been planned, made, or requested resulting from the alleged defect in the subject vehicles.

8. Provide a complete description of the slide-out assembly. Including 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.

Response

Refer to documents, 3, 3B, and 9

9. Provide a full description and copies of the maintenance and inspection requirements furnished by Fleetwood or for Fleetwood to owners that relate or may relate to the alleged defect in the subject component/assemblies.

Response

Refer to documents, 3, 3B, and 9

10. Furnish Fleetwood's assessment of the alleged defect in the subject vehicle, including:

Response

- a. The causal or contributory factor(s);
The single significant causal factor (over 60%, 115 of 189 total units) appears to be the manual brake release lever being in the released position.
- b. The failure mechanism(s);
Unknown. The lever must be manually moved. In many cases the consumer had experienced a slide room stuck in the extended position at a campground and had followed instructions to manually retract the room. Part of the process for manual retraction is the manual release of the brake with the final

step being the reapplication of the brake. We hypothesize that possibly 115 units out of a production population of 156,652 units (0.0007%) may have left the brake lever released after manually retracting the slide-out room.

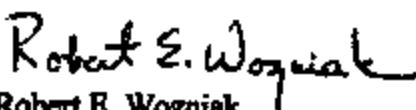
- c. The failure mode(s);
Manual brake lever released.
- d. The risk to motor vehicle safety that it poses; and
Based on Power Gear testing, the dynamic braking force generated by the gearmotor assembly alone results in a range of 300-600 pounds. The complete gearmotor with integrated brake assembly generates a holding/braking force of 800-2400 pounds. This means that it would take a lateral acceleration force on a typical 1200 pound room of over 1 G to overcome the dual braking features of the Power Gear slideout mechanism. Based on the testing by Power Gear, a maximum noted extension of 4 inches prior to frictional forces stopping the extension, and the low incidence of occurrence Fleetwood does not believe there is a risk to motor vehicle safety. Other slide-out room mechanisms used by Fleetwood Motor Homes and Travel Trailers use similar braking technology.
- e. What warnings, if any, the operator and other people both inside and outside the vehicle would have that the alleged defect was occurring?
Vehicle operator and other people may observe the room extended away from the side of the vehicle.

Fleetwood believes that a highway safety issue exists if a full deployment of a slide-out room should occur, however, all analysis indicates that a condition that could be called room creep (room movement of 1 to 3 inches as reported) is what is occurring. This condition does not represent a highway hazard for either the Motor Home or Travel Trailer operator or other traffic.

Please note the attached research into both warranty files and customer contact records for the units identified as subject vehicles in PE06-005. These are noted as "Document 10" and are 4 pages in length.

If you have any additional questions please contact myself.

Sincerely,



Robert E. Wozniak
Director of Engineering and Product Compliance
Recreational Vehicle Group