



March 3, 2006

Folding Trailer Division

258 Beacon Street / P.O. Box 111

Somerset, PA 15501-3100

p: 814.445.9661 / f: 814.443.7320

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 response prepared by the Fleetwood 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 1

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
0 reports pertaining to (a)
- 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

Not applicable, refer to question #2

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 1 and 1A

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

Lifeco Inc.
24076 Reedy Drive
Elkhart, IN 46514
Scott Hammontree
2002 through 2004 Caravan - driver's side, dinette or sofa
Refer to Document 2

Norco Industries, Inc
532236 Country Road 13
Elkhart, IN 46514
Bernie Garceau
2005 Resort - driver's side dinette and/or sofa and rear bed
Refer to Documents 3 & 3A

Lippert Components, Inc
2766 College Ave.
Goshen, IN 46528
Jason Lippert
2004 MicroLite - driver's side, dinette and sofa
No response from supplier - refer to attached request letter (Document 3B)

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.

Response

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

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 changes anticipated

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 2, 3, 3A, 3B, 4, 4A and 5

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 2, 3, 3A, 3B, 4, 4A and 5

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

Response

- a. The causal or contributory factor(s);
Latch mis-positioned during design
- b. The failure mechanism(s);
Slide box latch
- c. The failure mode(s);
Not positioned far enough outboard
- d. The risk to motor vehicle safety that it poses; and
None, ACME Screwdrive prevents movement of more than an inch
- e. What warnings, if any, the operator and other people both inside and outside the vehicle would have that the alleged defect was occurring?
Visible gap between slide-out box molding and sidewall if outside the vehicle.
Unlikely someone inside vehicle would notice



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DOCUMENT IDENTIFICATION

Document 1.....Synopsis of Units Produced with Slide-outs, Total Slide-out Warranty Claims, Total Warranty Claims for Folding Trailer Slide-outs with "Disengagement Problems During Travel

Document 1A.....Warranty Claims for Folding Trailers Related to "Disengagement"

Document 2.....Lifco Slide-out Information and Request Letter

Documents 3 & 3A.....Norco Slide-out Information and Request Letter

Document 3B.....Lippert Slide-out Information and Request Letter

Document 4.....Travel Trailer Slide-out Information (Information taken from owner's manual)

Document 4A.....Travel Trailer Slide-out Information (Information taken from owner's manual)

Document 5.....Folding Trailer Slide-out Information