



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

AUG 21 2007

1200 New Jersey Avenue SE
Washington, DC 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Daniel Del Rio
Customer Service Manager
Wheeled Coach Industries
2737 N. Forsyth Road
Winter Park, FL 32792

NVS-214phk
PE07-043

Dear Mr. Del Rio:

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 (PE07-043) to investigate Wheeled Coach ambulance's that use the Model Years 2004 – 2007 E-350/E-450 Ford cutaway chassis. ODI is aware of the April 20, 2007 corrective action request on Wheeled Coach's relating to corrosion of the 400 amp primary fuse circuit on the subject vehicles. This corrosion of the fuse block circuit may result in a loss of power to the interior/exterior lights (including warning lights) and render inoperative all patient compartment 12V circuits. Disabled warning lights may result in an increased risk of a crash while the ambulance is responding to an emergency. ODI learned from the CAR report that the corrosion is caused by the calcium chloride chemical elements that are used in the northern states during the winter seasons.

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

- **Subject vehicles:** Wheeled Coach Model Years 2004-2007 E-350/E-450 Ford cutaway and E-350 van chassis.
- **Alleged Defect:** Corrosion of the 400 Amp primary fuse circuit resulting in a loss of power to the interior/exterior lights and equipment in the patient cab area of the ambulance.
- **Subject Component:** ANL 400 Amp primary fuse circuit.
- **Wheeled Coach:** Wheeled Coach, 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 Wheeled Coach (including all business units and persons previously referred to), who are or 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; or
 - 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.
- **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 Wheeled Coach, 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. Insofar as Wheeled Coach has previously provided a document to ODI, Wheeled Coach may 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 an explanation.

Please repeat the applicable request verbatim above each response. After Wheeled Coach's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. Separately by model, state the number of subject vehicles that Wheeled Coach has manufactured for sale or lease in the United States.
2. Separately by model, for each subject vehicle manufactured to date by Wheeled Coach, provide the following:
 - a. vehicle identification number (VIN);
 - b. make;
 - c. model;
 - d. model year;
 - e. gross vehicle weight rating (GVWR);
 - f. date of chassis manufacture;
 - g. date warranty coverage commenced; and
 - h. the State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Excel, or a compatible format, entitled Response No. 2, PRODUCTION DATA.

3. For each model vehicle identified in questions No. 1 and 2, state the location of the 400 Amp fuse panel.
4. State the total number of each for every category listed below, and separately (by category) provide copies of the following, received by Wheeled Coach, or of which Wheeled Coach is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. consumer complaints, including those from fleet operators;
- b. claims that were made to the chassis supplier;
- c. field reports, including dealer field reports;
- d. reports involving a crash, injury, or fatality;
- e. property damage claims;
- f. third-party arbitration proceedings where Wheeled Coach is or was a party to the arbitration (to include all pleadings, orders, depositions, and related documents); and
- g. lawsuits (to include all pleadings, orders, depositions, and related documents) both pending and closed, in which Wheeled Coach is or was a defendant or codefendant.

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).

In addition to the requested hardcopies, provide a table in Excel, or a compatible format, entitled "Response No. 4, CLAIM DATA."

5. Separately and grouped by model for each item (complaint, claim, field report, etc) within the scope of your response to Request No. 4, provide the following information:
 - a. Wheeled Coach's file number or other identifier used;
 - b. the category of the item, as identified in Request No. 4 (i.e., consumer complaint, field report, etc.);
 - c. vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. vehicle's, model and model year;
 - e. vehicle's mileage at time of incident;
 - f. incident date;
 - g. report or claim date;
 - h. whether a crash is alleged;
 - i. whether a fire is alleged;
 - j. whether property damage is alleged;
 - k. number of alleged injuries, if any;
 - l. number of alleged fatalities, if any;
 - m. concern stated by customer;
 - n. what parts were repaired, changed or replaced;
 - o. comment/notes, if any, by dealer/technician relating to claim and/or repair;
 - p. Wheeled Coach's assessment of the claim;
 - q. a copy of any documents that were sent to the dealer or repair facility to aid or assist in repairing the problem.

If any vehicle was the subject of an inspection by Wheeled Coach, provide a copy of all field reports along with the conclusion and recommendations or resolution.

In addition to providing the requested documentation, provide this information in Excel, or a compatible format, entitled "Response to No. 5 CLAIM DATA."

6. State, by model year and model, a total count for all of the following categories of claims, collectively, that have been paid by Wheeled 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, provide a copy of each claim. Also, state the date(s) in which Wheeled Coach provided NHTSA with a copy of the communication.
7. Separately for each such claim listed in No. 6, provide the following information:
 - a. Wheeled Coach's claim number;
 - b. vehicle owner or fleet name (and fleet contact person) and telephone number;
 - c. VIN;
 - d. repair date;
 - e. vehicle mileage at time of repair;
 - f. repairing dealer's or facility's name, telephone number, city and state or ZIP code;
 - g. labor operation number;
 - h. problem code;
 - i. replacement part number(s) and description(s);
 - j. concern stated by customer;
 - k. comment, if any, by dealer/technician relating to claim and/or repair; and
 - l. Wheeled Coach's assessment of the claim.

Also, Provide this information in Excel, or a compatible format, entitled "Response to No 7 CLAIM PAID DATA."

8. Produce copies of any and all service, warranty, and other documents that relate to, or may relate to the alleged defect in the subject vehicles, that Wheeled 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, special instructions or other documents or communications, with the exception of standard shop manuals. Also, include the latest draft copy of any communication that Wheeled Coach is planning to issue. Additionally, for each item:
 - a. state the date on which the document was provided to NHTSA pursuant to CFR 579.5;
 - b. identify which vehicles are affected or involved; and
 - c. provide a brief summary of the subject and objective of the action.
9. Describe and provide a copy of any/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, Wheeled 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 field action; and
- f. a brief summary of the findings and/or conclusions resulting from the field action.

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.

10. Describe all modifications or changes made by, or on behalf of, Wheeled Coach in the design, supply, or installation of the subject component, 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 or performed as a field action;
- b. a detailed description of the modification or change;
- c. the reason(s) for the modification or change;
- d. the part number (service and engineering) of the modified component;
- e. when the modified component was made available as a service component; and
- f. whether the modified component can be interchanged with earlier production components.

11. Furnish Wheeled Coach's detailed 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 persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning.

This letter is being sent to Wheeled Coach 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. Wheeled Coach's failure to respond promptly and fully to this letter could subject Wheeled Coach 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 \$5,000 per day, with a maximum of \$15 million 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 to ODI information requests.

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

Wheeled Coach's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **October 1, 2007**. Please refer to **PE07-043** in Wheeled Coach's response to this letter. If Wheeled Coach finds that it is unable to provide all of the information requested within the time allotted, Wheeled Coach must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Wheeled Coach 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 Wheeled Coach then has available, even if an extension has been granted.

If Wheeled Coach claims 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, Wheeled Coach 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 (68 Fed. Reg. 44209 et seq; July 28, 2003), to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Wheeled Coach 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 Mr. Peter Kivett of my staff at (202) 366-6178.

Sincerely,



Richard P. Boyd, Chief
MHDV Division
Office of Defects Investigation
Safety Assurance