



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

JAN 23 2008

1200 New Jersey Avenue SE
Washington, DC 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George Weart
National Owner Relations Manager
Fleetwood Motor Homes
1010 Commerce Drive
Decatur, IN. 46733

NVS-214gtb
PE07-055

Dear Mr. Weart:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has developed some new information and has some additional questions pertaining to Preliminary Evaluation (PE07-055) which addresses reports of leaks in the gasoline fuel line that connects the onboard generator to the main fuel tank in 1998 and 1999 model year Fleetwood Bounder vehicles.

On January 17, 2008, ODI received a complaint alleging that the generator fuel line had cracked and leaked in a 1999 Fleetwood model Flair vehicle. Although ODI has not received any other complaints about cracked or leaking fuel lines in Flair vehicles, ODI is concerned that, in light of this new report, it is prudent to expand the scope of the inquiry sent to Fleetwood on November 16, 2007.

In order for my staff to evaluate this issue, certain information is requested.

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

- **Subject vehicles:** all models of all Fleetwood vehicles manufactured between January 1, 1997, and December 31, 1999, equipped with gasoline fuel line connecting the onboard generator to the main fuel tank.
- **Alleged Defect:** one or more cracks in or through the wall of the rubber fuel line connecting the onboard generator to the fuel tank and/or reports of fuel leaks whether or not confirmed.
- **Fleetwood RV ("Fleetwood"):** 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



Fleetwood (including all business units and persons previously referred to), who are or, in or after 1997 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.
- **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 Fleetwood'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 or Excel 2003 electronic format.

Population Information -

1. Provide a table that lists by model, model year, and manufacturing location, the total number of "Subject Vehicles" that Fleetwood has manufactured for sale or lease in the United States since January 1, 1996.

Provide the information in table format using in Microsoft Access or Excel 2003, or a compatible format, entitled "PE07-055 Supplement, Request Number One - Vehicle Production"

Complaint Information Summary -

2. State the number of each of the following, received by Fleetwood, or of which Fleetwood 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) Field reports, including dealer field reports;
 - c) Reports involving a crash, injury, or 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) Reports involving a fire, based on claims against Fleetwood involving a death or injury, notices received by Fleetwood 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;
 - e) Property damage claims;
 - f) Third-party arbitration proceedings where Fleetwood is or was a party to the arbitration; and,
 - g) Lawsuits, both pending and closed, in which Fleetwood is or was a defendant or codefendant.

For subparts "a" through "e," 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).

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

For items "f" and "g," 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 or Excel 2003, or a compatible format, entitled "PE07-055, Request Number Two Supplement- Complaint Information Summary."

Complaint Details -

3. Separately, for each item (complaint, report, claim, notice, or matter) identified in response to Request No. 2 above, state the following information:
 - a) Fleetwood's file number or other identifier used;
 - b) The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c) Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d) Vehicle's VIN, serial number, or other identifier;

- e) Vehicle's make, model and model year;
- f) Vehicle's mileage at the time of the incident;
- g) Incident date;
- h) Report or claim date;
- i) Whether a fire is alleged;
- j) Whether a crash is alleged;
- k) Whether property damage is alleged;
- l) Number of alleged injuries, if any; and
- m) Number of alleged fatalities, if any.

Provide the table in Microsoft Access or Excel 2003, or a compatible format, entitled "PE07-055, Request Number Three Supplement – Complaint Details."

Warranty Information -

4. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Fleetwood 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, for each such claim, state the following information:

- a) Fleetwood's claim number;
- b) Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c) VIN, serial number, or other identifier;
- 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; and
- k) Comment, if any, by dealer/technician relating to claim and/or repair;
- l) Description of the repairs conducted.

Provide the table in Microsoft Access or Excel 2003, or a compatible format, entitled "PE07-055. Request Number Four Supplement– Warranty Information."

Manufacturer's Investigation and Assessment -

5. Furnish Fleetwood's detailed opinion of the alleged defect in the subject vehicles. Include an assessment of the following:

- a) the causal or contributing factors;
- b) the failure mode;
- c) the risk to motor vehicle safety that it poses;
- d) what warnings, if any, are provided to the vehicle operator and/or other persons.

Product Changes -

6. Describe all modifications or changes made by, or on behalf of, Fleetwood in the design, manufacture, quality control, supply, or installation of the subject fuel line that, from the start of production to date, relate to, or may relate to, a fuel line 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;
- b) A detailed description of the modification or change;
- c) The reason(s) for the modification or 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 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.

Notices -

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Fleetwood 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, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Fleetwood is planning to issue within the next 120 days.

This letter is being sent to Fleetwood 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. Fleetwood's failure to respond promptly and fully to this letter could subject Fleetwood 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 \$16,050,000 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 69 Fed. Reg. 57864 (Sep 28, 2004)). This includes failing to respond to ODI information requests.

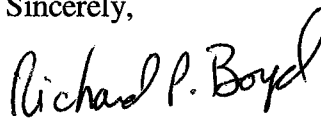
If Fleetwood cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Fleetwood does not submit one or more requested documents or items of information in response to this information request, Fleetwood 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.

Fleetwood's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **March 1, 2008**. Please refer to **PE07-055 - Supplement** in Fleetwood's response to this letter. If Fleetwood finds that it is unable to provide all of the information requested within the time allotted, Fleetwood must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Fleetwood 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 Fleetwood then has available, even if an extension has been granted.

If Fleetwood 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, Fleetwood 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 (NCC-110), National Highway Traffic Safety Administration, **Room W41-227, 1200 New Jersey Avenue SE, Washington, D.C. 20590**. Fleetwood 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. Tom Bowman of my staff at (202) 366-2583.

Sincerely,



Richard Boyd, Chief
Medium & Heavy Duty Vehicle Division
Office of Defects Investigation