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OFFICE OF DEFECTS INVESTIGATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

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MHDV Division
Office of Defects Investigation
National Highway Traffic Safety Adm.

NVS-214phk
PE07-043

This letter is Wheeled Coach Industries response to your letter of August, 2007 in which you raised several questions about a field service campaign Wheeled Coach is conducting on certain Ford powered ambulances. As you instructed, each specific question will be listed and then the answer supplied. Should these answers not meet your needs, please supply follow up questions and we will attempt to answer those questions as well.

1. Separately by model, state the number of subject vehicles that Wheeled Coach has manufactured for sale or lease in the United States.

Year	Type II	Type III (SRW)	Type III(DRW)	Type IIIA(DRW)	OTHERS
2004	114	10	67	179	209
2005	257	0	121	289	258
2006	321	0	180	456	431
2007	118	0	19	2	247

The Type II ambulances listed are all based on the Ford Econoline van chassis with diesel engines and automatic transmissions. The Type III (SRW) ambulances are all based on the Ford single rear wheel cutaway E-350 chassis and have diesel engines and automatic transmissions. The Type III (DRW) ambulances are conversions based on the Ford E-350 dual wheel cutaway chassis with diesel engines and automatic transmissions. The Type IIIA (DRW) ambulances are based on the Ford E-450 cutaway chassis and have diesel engines and automatic transmissions. OTHERS are all other ambulances manufactured by Wheeled Coach in this time period and are conversions on other types of chassis such as Ford F series cab chassis trucks and Navistar cab chassis trucks. These ambulances are not involved in this program and don't have the fuse that is the subject of Wheeled Coaches service program. All information was gathered via a query from our MAPICS Software on 9/26/2007.



2. Separately by model, for each subject vehicle manufactured to date by Wheeled Coach, provide the following:
 - (a) VIN's
 - (b) Make
 - (c) Model
 - (d) Model Year
 - (e) G.V.W.R
 - (f) Date of chassis manufacture
 - (g) Date of warranty coverage commenced
 - (h) State where the vehicle was originally sold

Please find attached an excel spread sheet with columns labeled according to your scheme with the requested data. As you suggest the file name is Production Data. It is submitted both as a disc and as a printed format. Please note that we have separated the information based on units that were affected by corrosion and those units in warm weather states that were not affected by corrosion. Wheeled Coach provides warranty coverage to customers conditioned upon receiving a customer signed warranty registration card. Those units showing no warranty start date indicate that the customer hasn't sent in the warranty registration card at this time. All information was gathered via a query from our MAPICS Software on 9/26/2007. Data is currently sorted by State.

3. For each model vehicle identified in questions No. 1 and 2, state the location of the location of the 400 Amp fuse panel.

Type II units - Fuse is located curbside under curbside entrance doors between the two OEM batteries. There will be a rubber cover surrounding the fuse.

All Type III units the fuse is located under the unit, curbside, and forward of the battery compartment attached to the back of the cab step well.



4. State the total number of each for every category listed below, and separately 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):
 - (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.

As you suggest, answers are attached listed as Appendix III in an excel spreadsheet. All supporting documents are packaged in separate envelopes and marked to show which vehicle class they pertain. As you will notice as you review the attached material, there are a very small number of field complaints. All that Wheeled Coach is aware of are listed in the appropriate appendix. All information was gathered via a query from our Approach Software on 9/26/2007.



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
- (c) Vehicle owner or fleet name address, and telephone number
- (d) Vehicle's model and model year
- (e) Vehicle's mileage at the time of the 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 to aid in repairs

If any vehicle was the subject of an inspection by Wheeled Coach, provide a copy of any resulting report as well as any conclusion or recommendations.

As you suggest the answers to this series of questions is compiled in another excel spreadsheet that is attached as Appendix IV. There have been no wrecks as a result of the corrosion of the fuse involved in these vehicles. So many of the answers to your questions are none. The appropriate spread sheet has the file name NO5CLAIMDATA. All information was gathered via a query from our Approach Software on 9/26/2007.



6. State, by model year and model, a total count for all 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; 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 in which Wheeled Coach provided NHTSA with a copy of the communication.

Copies of all appropriate warranty claims are attached to this letter. Each of the four models listed above have an envelope with claims addressed to that class of ambulance. Wheeled Coach has never given NHTSA copies of this claim until this submission. All information was gathered via a query from our Approach Software on 9/26/2007.

7. Separately for each claim listed in No. 6, provide the following information:
- (a) Wheeled Coach's claim number
 - (b) Vehicle owner or fleet name and telephone number
 - (c) VIN
 - (d) Repair date
 - (e) Vehicle mileage at time of repair
 - (f) Repairing dealer's name, telephone number, city and state or zip
 - (g) Labor operation number
 - (h) Problem code
 - (i) Replacement part numbers and description
 - (j) Concern stated by customer
 - (k) Comment if any, by dealer relating to claim and or repair
 - (l) Wheeled Coach's assessment of claim

Responses to this listing of questions will be listed in an excel spreadsheet entitled Appendix V with a file name linked to your number 7: Resp7CIPaid. The file is supplied on the enclosed disc and in printed format. All information was gathered via a query from our Approach Software on 9/26/2007.



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 workshop manuals. Also include the latest draft copy of any communication that Wheeled Coach is planning to issue. Additionally, for each item: state the date on which the document was provided to NHTSA; identify which vehicles are affected; and provide a brief summary of the subject and object of the action.

All pertinent documents are attached to this letter. Stapled to each document is a listing of vehicles to which the document pertains, date submitted, and a summary of the publication. All information was gathered via a query from our Approach Software on 9/26/2007.

9. Describe and provide a copy of all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations that relate to, or may relate to, the alleged defect in the subject vehicles the 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: action identifier; the actual start date; the actual end date; brief summary of the subject and objective of the action; engineering groups/ suppliers/ responsible for designing and conducting the field action; and a brief summary of findings and/ or conclusions resulting from the field action.

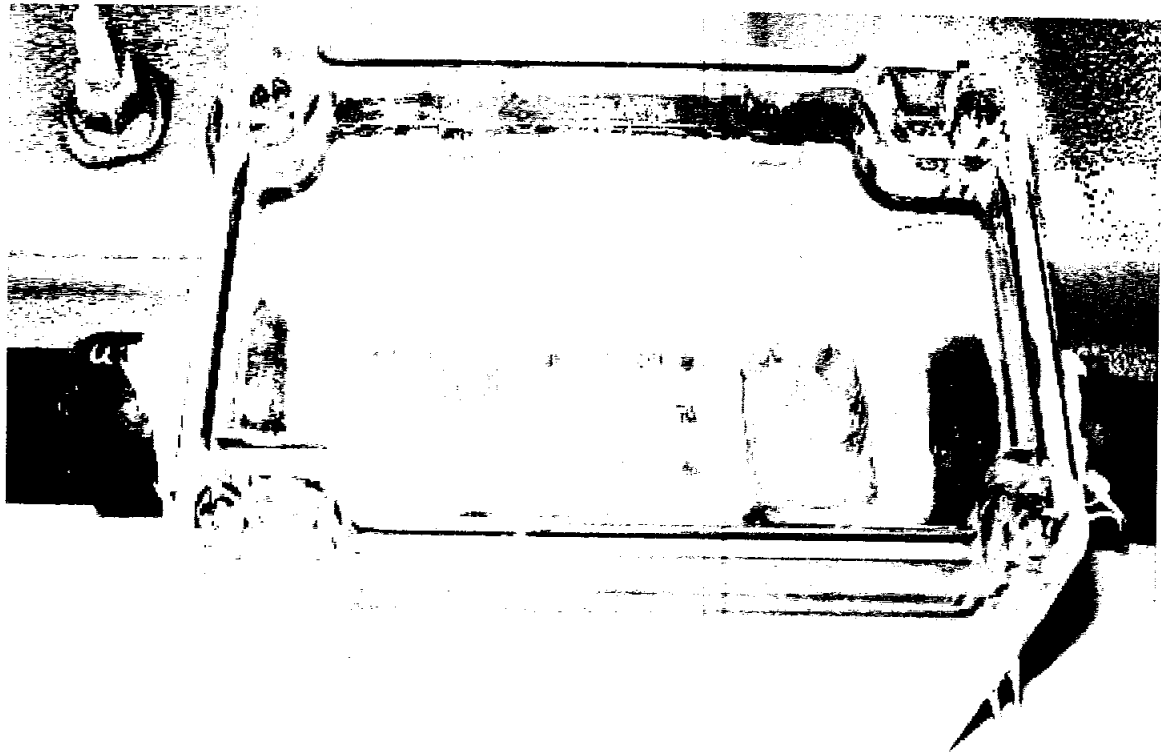
There are none.



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 preformed 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.

The Electrical Engineering department of Wheeled Coach developed a production solution. This solution is implemented in two different ways. The first way is relocating the ANL 400 Amps Fuse on Type III units (E-350 and E-450 Cutaway chassis) into the battery compartment. The second way for the E-350 van was to install an enclosed fuse box on the back of the step well compartment in which the fuse and cables are located. See next page for visual picture:



As you can see from the picture, the fuse is fully enclosed in the sealed box. This procedure applies to Type II ambulances. The Type III ambulances has the fuse mounted inside the battery compartment on the right side of the ambulance body. The battery and Fuse are serviced by pulling out a drawer on slides that allows access to the battery and the fuse. Both items are protected from the elements in this slide out drawer.



11. Furnish Wheeled Coach's detailed assessment of the alleged defect in subject vehicles, including.

- (a) the causal or contributing factors(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.

Wheeled Coach has concluded that the most significant contributor to the corrosion on the main circuit fuse is the road deicing compounds used in many northern states. Currently, there are no claims from ambulances operating in southern states. If salt water was a contributor, this issue would have shown up in coastal areas. This circuit interrupts takes sometime to happen, even in the most heavily salted roads of Michigan or Wisconsin. The earliest claims Wheeled Coach has, took about two calendar years of vehicle operation for the problem to appear. It does appear that the corrosion spread slows down during the summer months.

A typical time to failure is about two years. Inspection of the fuse will give plenty of time to correct the situation prior to losing power to the patient compartment. Keep in mind the vehicle still operates if power is disrupted to the patient compartment. That is to say that transport patients still arrive at their destinations. What is lost is the ability to provide the full complement of emergency medical treatment options to patients. It is important to note that the full warning light system isn't available with power disrupted to the patient compartment. During the power interruption, emergency personnel must precede using normal traffic procedures. They do still have the siren available to allow them to signal other motorists.

The failure mode is the complete disruption of the main power circuit to the Wheeled Coach conversion. This power disruption is not a risk to regular traffic. It poses a threat to the patient being transported. Personnel will know this power lost has occurred when lights in the patient compartment can not be illuminated. In one claim a small electrical fire occurred near the fuse. You can read about this incident in Wheeled Coach claim numbered 28034. The warranty claim forms you requested are attached to this letter. This fire required \$400 to repair which shows the limited nature of the fire hazard. Only one such claim was received by Wheeled Coach.



Wheeled Coach believes that all the information you seek is included in this letter. Should you have specific questions to discuss, you can contact Wheeled Coach's customer service manager at 407-677-7777 during normal business hours.

Sincerely

A handwritten signature in dark ink, appearing to read 'Daniel Del Rio', written over a horizontal line.

Daniel Del Rio
Customer Service Manager
Wheeled Coach Industries