

February 29, 2008

Fleetwood Enterprises, Inc.
3030 Myers Street / Riverside, CA 92503-5527
P.O. Box 7638 / Riverside, CA 92513-7638
p: 800.322.8216 / www.fleetwoodrv.com

Mr. Richard Boyd, Chief
Med/ Heavy Duty Vehicle Division
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

Subject: PE 07-055 Supplement Response

Dear Mr. Boyd,

This letter has been prepared in response to your PE07-055 Supplement to investigate reports of leaks in the gasoline fuel line that connects the onboard generator to the main fuel tank in 1998 and 1999 model 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.

- **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.

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.

Response

See attachment "Request Number One", Excel worksheet

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:

Response

See attachment "Request Number Two", Excel worksheet

- 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, notice 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.

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.

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:

Response

See attachment "Request Number Three", Excel worksheet

- 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.

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.

Response

See attachment "Request Number Four", Excel worksheet

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 state by customer; and
- k) Comment, if any, by dealer/technician relating to claim and/or repair;
- l) Description of the repairs conducted.

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:

Response

- a) the causal or contributing factors;

Fleetwood's review of exemplar generator fuel hoses failed to identify any specific cause. Fleetwood has ruled out UV, heat and cold, chaffing by an exterior component or other contributing factor. The exact cause of the failed fuel lines remains undetermined at this time.

- b) the failure mode;

Hardening and brittleness of the hose, which causes minor cracking or splitting of the hose, leading to erratic or non-operation of the generator.

- c) the risk to motor vehicle safety that it poses;

Fleetwood believes that this does not pose a significant risk to motor vehicle safety for the following reasons;

The fuel hose in question is not in or around any identifiable ignition source, is not a pressurized hose that would excrete a pressurized stream or vapor in high concentrations as fuel is pulled through the line at low negative pressures. The fuel hose would contain no pressure when the generator is not in use and upon failure the generator would exhibit erratic (surging) or non-operation of the generator alerting the operator to its failure.

Over the course of the last eleven (11) years Fleetwood has not determined that the alleged defect has caused or contributed in any way to an incident that has led to an accident, fire, property damage, loss of life or any similar event.

This is supported by the claim and customer complaint data that indicates a failure rate of .007 % across a population of approximately 35,776 units.

Of the customer complaints eighteen (18) or .0005 % indicated some form of minor fuel seepage.

Claim data for paid repairs indicated that of the total population of claims received and paid indicated that forty (40) or .0011 % indicated some form of minor fuel seepage.

The majority of the concerns received either in the form of customer complaints or claim reports indicated either erratic or non-operation of the generator.

Fleetwood's assessment of alleged fuel seepage has determined this to be from minor seeping and staining from stationary fuel that may be left in the fuel hose after generator operation.

- d) what warnings, if any, are provided to the vehicle operator and/or other persons.

In the event of a fuel hose failure the customer would be alerted to the problem by way of erratic (surging) or non-operation of the generator due to an interruption of the fuel flow.

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.

Response

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;

A new fuel line was incorporated on:

March 2, 2005. (Boulder)

December 23, 2005 (Southwind, Pace Arrow, Pace Arrow Vision, Flair, Storm)

December 21, 2005 (Tioga, Jamboree)

January 4, 2006 (Tioga SL, Jamboree GT)

Required Fuel line clamps were incorporated on February 28, 2005.

- b) A detailed description of the modification or change;

The generator fuel supply hose was revised from an SAE J30 R7 to a SAE J30 R9 fuel line.

A different style of fuel line clamps at the rubber fuel hose was a required RVIA/SAE code revision.

- c) The reason(s) for the modification or change;

The generator fuel supply hose was changed at the direction of Fleetwood Engineering.

The clamps were a required code revision by RVIA/SAE.

- d) The part numbers (service and engineering) of the original component;

**Hose-Gas 1/4ID L41-0002 SAE J30 R7
Clamp #4 ADJ MTL 1/4-5/8 M86-0004**

- e) The part number (service and engineering) of the modified component;

**Hose-Gas 1/4ID L41-0104 SAE J30 R9
Clamp-Crimp SS 11.3-13.8MM M86-0310**

- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;

**Hose-Gas 1/4ID L41-0002, was phased out beginning in March 2005.
(see response 6a for approximate dates)
Clamp #4 ADJ MTL 1/4-5/8 M86-0004, February 28, 2005**

These parts were phased out of production as part of a running design change. The original SAE J30 R7 has not been withdrawn for sale and is still specified as a replacement service part for applicable motor homes.

- g) When the modified component was made available as a service component; and,

See response to question 6F.

- h) Whether the modified component can be interchanged with earlier production components.

Yes, the new components are interchangeable, however both are currently offered as OEM replacements. Our research indicates that dealerships normally obtain these components in bulk on the open market and can be interchanged.

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

Fleetwood is not aware of any planned changes 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.

Response

Fleetwood is not aware of any documents that appear to be called for in response to number 7 and has no further planned activity within the next 120 days.

In summary, Fleetwood shares the NHTSA's concern that fuel leaks could be a safety hazard. Customers are instructed in their Owner's Manuals to inspect the generator fuel lines "often". Adherences to maintenance procedures outlined by the manufacturer are meant to identify and prevent these types of concerns.

The recent inspection of a 1999 Flair Motor Home attended by NHTSA and Fleetwood representatives indicated the presence of fuel seepage. As a result of this inspection Fleetwood will be conducting additional engineering analysis. The inspection of this motor home and interview of the customer revealed other factors and considerations, such as the possibility of overfilling of the fuel tank and alteration/modification of the OEM fuel delivery system that need to be investigated. However, the inspection in and of itself did not reveal enough information for Fleetwood to conclude that the population of units is at a greater risk than believed.

Our current investigation has not developed any new information that would lead us to believe that it would be feasible for a fire to occur from the minimal amount of fuel seepage that may be experienced from a cracked or split generator fuel supply hose. Customers are warned of a concern by way of erratic or non-operation of the generator due to an interruption of the generator fuel supply.

If, after review of this submittal, you have any questions, or wish to discuss this matter further, please contact Mr. George Weart, National Owner Relations Manager, Fleetwood Motor Home Group at (260) 724-5770.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Biazo". The signature is fluid and cursive, with the first name "Craig" written in a larger, more prominent script than the last name "Biazo".

Craig Biazo
Director of Service
Travel Trailer Division
Fleetwood Enterprises, Inc.