

1/21/08

Newmar's response to ODI request for information relative to PE07-061

- 1) PE07-061, Request Number One-- Production information
 - a. Newmar Corporation has not knowingly manufactured any motor homes equipped with one or more cargo doors equipped with a feature that lifts a cargo door when unlatched as described in the "Subject Component" definition of this inquiry. Newmar has manufactured motor homes equipped with one or more cargo doors equipped with a strut that is capable of retaining or holding an open cargo door in the open position. This strut system does not act in such a way that it would lift an unlatched cargo door away from the latch to the open position. The force applied to the door by the strut as designed serves to hold the door closed against the latch strike rod even when the door is unlatched. The strut system is designed so that the force applied by the strut will hold the door closed against the latch until an outside force acts on the door lifting it partially open such that the strut mechanism goes "over center". Once the door is opened a sufficient distance that the strut mechanism passes "over center", the force applied by the strut then serves to lift against the weight of the door to support the door in a raised position.
 - b. Newmar has manufactured approximately 6373 motor homes during the 2005 through 2008 model year which may have had one or more cargo doors equipped with a strut system designed to hold an opened cargo door in the open position. It should be noted that the 2008 model year is still in process at the time of this report and that as a result these numbers do not include the entire 2008 model year.
- 2) PE07-061, Request Number Two—Number of Vehicles equipped with a Secondary latch
 - a. None
- 3) PE07-061, Request Number Three—Number of Vehicles with lift assist cargo doors equipped with warning systems
 - a. None
- 4) PE07-061, Request Number Four—Complaint information summary
 - a. Of the 6373 subject vehicles manufactured, Newmar has received complaints from only three customers alleging that a cargo door (subsequently determined to be a top hinged cargo door with a strut designed to hold the door open in a raised position) came open while traveling. In addition to these three customer complaints determined to be related to top hinge door applications, Newmar has also received an additional twelve complaints alleging either that an unidentified cargo door came open while traveling or alleging that a top hinge door came open without specifying whether or not the unit was in motion at the time. It is not known if the doors alleged to have opened in these

twelve complaints were of the top hinge design or not, nor in some cases whether or not the unit was moving at the time of the alleged incident.

5) PE07-061, Request Number Five—Incident details

- a. **Incident 1**—MACA Unit 902652 —customer alleged that a compartment door came open while going down the road—this door is believed to be a top hinged door--no damage, injuries or fatalities were reported in this incident

Incident 2—DSDP Unit 602759—customer alleges that a compartment door came open and struck a parked motorcycle while the motor home was turning off the roadway into a “turn out”—this door is believed to be a top hinged door--no injuries or fatalities were reported in this incident

Incident 3—DSDP Unit 603196—customer alleges that a compartment door on the driver side of the vehicle came open and struck a guard rail while driving--this door is believed to be a top hinged door--no injuries or fatalities were reported in this incident

Incidents 4 through 15--- customer alleged a baggage door came open---it has not been determined what door design was involved in these incidents—no collisions, injuries or fatalities were reported in any of these twelve alleged incidents

6) The search criteria used by Newmar Customer Service to identify the incidents described above from Newmar Warranty call center records, Newmar Consumer affairs call notes and Newmar Warranty Service records for 2005 through 2008 models was as follows:

- a. Cargo and open
- b. Door and open
- c. Baggage and open
- d. Bay and open
- e. Door and unlatched
- f. Cargo and unlatched
- g. Baggage and unlatched
- h. Bay and unlatched

7) Product Characteristics

- a. Strut systems are used on cargo doors of Newmar motor homes as well as peer products in the industry for the purpose of supporting the door in an open position while the customer is accessing the storage bay to load and unload or service cargo and equipment located in the compartment. The strut allows the customer to have both hands free to access cargo and equipment without the need to use one hand to continuously hold the door in position
- b. Older motor home designs tend to use cargo doors that open vertically due to the fact that this design allows the best access to the cargo area and is the easiest to operate and simplest and most reliable design to manufacture. In the last several years, motor home floorplan designs have evolved to include more expandable slideout rooms. When the motor home is parked and these expandable rooms are extended, the expandable room limits the distance that a top hinged cargo door can be opened and restricts access to the cargo areas located below the expandable rooms. As a result, side opening cargo doors have become more popular in recent years as they can provide better

access to cargo areas below the expandable rooms than what can be provided by vertically opened doors. Many motor homes use a combination of vertically opening and horizontally opening cargo doors in an effort to maximize customer convenience and access to cargo areas depending of the location of the cargo bay on the motor home. These designs are widely used throughout the industry by all known peer manufacturers.

- c. Vertically opening compartment doors are usually designed so that they open to a nearly vertical and upright position against the motor home sidewall. However, some vertically opening doors are necessarily restricted from opening beyond a horizontal position due to other features of the motor home affecting the door position. One example of this would be doors located below an expandable room. Vertically opening doors located below an expandable room are typically design to be supported in two positions. The first position (horizontal) allows the door to be held open with the room extended without causing damage to the door due to striking against the underside of the expandable room. Often times these doors are designed with either a two stage strut or a slotted strut bracket that permits the door to be opened further to a more vertical orientation at those times when the expandable room may be retracted. Another example would be doors located below a furnace or water heater vent. In these situations, the ANSI standard which governs motor home design does not permit the vertically opening door to open so far that it would pose a dangerous obstruction to the exhaust vent of these fuel burning appliances.
 - d. There is no know standard requiring the use of secondary latches on the cargo doors of a motor home and field experience to date has not indicated a need for such a device. The strut systems used on vertically opening baggage doors on Newmar motor homes are the same as those commonly used throughout the motor home industry. Newmar is not aware of any peer manufacturers using such a secondary latch device. The use of a secondary latch would presumably make it less convenient for the customer to operate the baggage doors.
 - e. There is no know standard requiring the use of warning systems on the cargo doors of a motor home and field experience to date has not indicated a need for such a device. The strut systems used on vertically opening baggage doors on Newmar motor homes are the same as those commonly used throughout the motor home industry. Newmar is not aware of any peer manufacturers using such a warning system. Many manufacturers including Newmar do use plunger type switches on their cargo doors to automatically turn on lighting inside the cargo compartment when the cargo door is opened. It is possible that an inspector who was not familiar with this design might assume that these switches were part of such a warning system when in fact they are operating interior lighting. This may explain ODI's indication that a peer motor home appeared to be equipped with a warning system.
- 8) PE07-061, Request Number Eight—Product Investigation and evaluations
- As part of Newmar's investigation in response to this inquiry, Newmar engineering and service personnel reviewed vertically opening baggage doors on both current production units as well

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