



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

JUL 31 2008

1200 New Jersey Avenue SE
Washington, DC 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dick Sabath
Senior Manager – Compliance Administration
Country Coach LLC
P. O. Box 400
135 East First Avenue
Junction City, Oregon 97448

PE08-046
NVS-214gtb

Subject: Loss of Power Steering Assist in Model Years 2007 and 2008 Affinity Model Country Coach Vehicles

Dear Mr. Sabath,

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) opened a Preliminary Evaluation (PE08-046) on July 24, 2008, to investigate allegations that certain model year 2007 and 2008 Affinity vehicles have experienced a loss of power steering assist without prior warning while the affected vehicles were being operated at highway speeds.

ODI is concerned that the loss of power steering assist in a Class A motor home such as the Country Coach Affinity may critically limit the maneuverability of the affected vehicle during normal and/or emergency maneuvers which could pose a risk to the driver and/or passengers of the affected vehicle and/or to pedestrians and/or other vehicles being operated in proximity to the affected vehicle.

Background-

On June 10, 2008, ODI received a Vehicle Owner's Questionnaire (VOQ 10230479) in which the owner of a 2007 model year Country Coach Affinity reported that his vehicle had experienced a loss of power steering assist. The owner also commented that controlling the vehicle following the loss of power steering assist had been challenging. Soon thereafter, ODI contacted Country Coach and requested that it review and assess this complaint. On July 17, 2008, ODI received Vehicle Owner's Questionnaire (VOQ 10234742) in which the owner reported a similar loss of power steering assist in a 2008 model year Affinity vehicle.

In order for my staff to evaluate this issue, ODI is requesting that Country Coach provide certain information.



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

- **Subject Vehicles**: all vehicles manufactured by Country Coach LLC equipped with a power steering system identical or similar to those installed in the vehicles that are the subject of VOQ 10230479 and VOQ 10234742.
- **Subject Components**: all power steering systems that are identical or similar to those installed in the vehicles that are the subject of VOQ 10230479 and 10234742.
- **Alleged Defect**: any unintended loss of power steering assist due to any cause including, but not limited to, loss of spline integrity caused by spline wear, fretting, fretting-corrosion, shearing, abrading, and the like, that can interrupt the power flow from the engine power take off system (PTO) to the power steering pump.
- **Country Coach LLC** (“Country 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 to a consultant) by or under the control of Country Coach (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;
 - 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; or
 - e. Management of any litigation involving Country Coach’s products that relate to the alleged defect.
- **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 Country 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.

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 Country Coach'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 2003 or Excel 2003 electronic format.

Vehicle Production-

1. Provide a table that identifies by (a) model year and (b) vehicle model the quantity of "subject vehicles" that Country Coach has manufactured for sale or lease in the United States.

Provide the table in Microsoft Access or Excel 2003, or a compatible format, entitled "PE08-046, Request Number One - Production Summary Information."

Vehicle Specifications -

2. For each of the vehicles identified in response in Request No 1, provide a table that identifies:

- (a) Vehicle Identification Number (VIN);
- (b) Vehicle make;
- (c) Vehicle model;
- (d) Vehicle model year;
- (e) Date of vehicle manufacture;
- (f) Date of sale or date that warranty coverage commenced;
- (g) First purchaser's name;
- (h) First purchaser's address;
- (i) First purchaser's phone number;
- (j) Maximum allowable Gross Vehicle Weight Rating (GVWR) specified on the certification label;
- (k) Maximum allowable Front Gross Axle Weight Rating (Front Axle GAWR) specified on the certification label;
- (l) Vehicle Wheelbase;
- (m) Size of the originally installed front tires;
- (n) Loaded Radius of the originally installed front tires;
- (o) Manufacturer of the originally installed front tires;
- (p) Complete model designation of the originally installed front tires;
- (q) Country Coach's recommended tire inflation pressure for the originally installed front tires;
- (r) The vehicle's front axle king pin angle (from vertical);
- (s) The vehicle's front axle scrub radius (intersection of tire centerline and king pin centerline when projected to the plane of a level ground surface).

Provide the table in Microsoft Access or Excel 2003, or a compatible format, entitled "PE08-046, Request Number Two - Vehicle Specifications."

Steering System Specifications -

3. For each of the vehicles identified in response in Request No 1, provide a table that identifies:

- (a) Vehicle Identification Number (VIN);
- (b) Engine make;
- (c) Engine model;
- (d) Engine size (displacement);
- (e) Engine horsepower;
- (f) Power take-off (PTO) mechanism (that powers the power steering pump) make;
- (g) Power take-off (PTO) mechanism (that powers the power steering pump) model;
- (h) The value of the gear / speed reduction between the engine crankshaft / flywheel (or equivalent) and the output shaft of the power take off mechanism that powers steering pump;
- (i) Power steering pump make;
- (j) Power steering pump model;
- (k) Power steering pump operating pressure;
- (l) Power steering pump displacement (or flow rate at a specified RPM);
- (m) Power steering gear make;
- (n) Power steering gear model;
- (o) Power steering gear ratio;
- (p) The vertical distance between the centerline of the steering gear output shaft to the centerline of the pitman arm mounted ball stud;
- (q) The horizontal distance between the centerline of the steering arm mounted ball stud to the midpoint of the king pin centerline;
- (r) The diameter of the steering wheel.

Provide the table in Microsoft Access or Excel 2003, or a compatible format, entitled "PE08-046, Request Number Three - Steering System Specifications."

4. For each of the power steering systems identified in response to Request No. 3, provide an assembly-level engineering drawing for each of the following:
 - (a) the power take-off mechanism as an individual sub-assembly;
 - (b) the power steering pump as an individual sub-assembly;
 - (c) the power take-off mechanism and power steering pump in the as-mounted, supported, and/or coupled position in the subject vehicles; and
 - (d) a representative drawing(s) depicting the vehicle's power steering system including, but not limited to, the power take-off mechanism, the power steering pump, the power steering gear, the steering wheel and steering shaft assembly, steering linkages including the tie rod, tie rod arms, and tie rod ends, the steering arms, steering knuckle, etal.
5. Describe the operation of the vehicle steering system(s) installed in the vehicles identified in response to Request No 1.

Reports of Incidents Alleging Loss of Power Steering Assist -

6. State the number of each of the following, whether or not confirmed, received by Country Coach, or of which Country 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) Field reports, including dealer field reports;
 - (c) Reports involving an injury or a 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) Property damage claims;
 - (e) Third-party arbitration proceedings where Country Coach is, or was, a party to the arbitration; and,
 - (f) Lawsuits, both pending and closed, in which Country Coach is, or was, a party;
 - (g) Warranty claims, whether or not reimbursed, including requests for special policy adjustment, extended warranty, and/or other similar consumer considerations such as "good will" and/or any and all other reimbursement request programs.

For subparts "a" through "d" and "g," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple reports of the same incident are to be counted separately (i.e., a consumer complaint and a field report involving the same incident are to be counted as a field report and a consumer complaint, etc.).

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

For items "e" and "f," 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 "PE08-046, Request Number Six - Complaint Information Summary."

Incident Information Regarding Reports of Loss of Power Steering Assist-

7. For each incident report received by Country Coach, or of which Country Coach is otherwise aware, whether or not confirmed, that a loss of power steering assist in the subject vehicles identify:
- (a) Country Coach's file number or other identifier used;
 - (b) The category of the incident as identified in Request No. 6 (i.e., consumer complaint, field report, etc.);

- (c) The vehicle's 17 digit Vehicle Identification Number (VIN);
- (d) The owner's (at the time of the incident) name;
- (e) The owner's (at the time of the incident) address;
- (f) The owner's (at the time of the incident) phone number;
- (g) The current owner's name (note: the current owner's name may differ from "first owner's name" requested in Request No.1 and "owner at the time of the incident" requested above);
- (h) The current owner's address;
- (i) The current owner's phone number
- (j) The incident date;
- (k) The incident location;
- (l) The report or claim date;
- (m) A brief description of the incident;
- (n) Whether property damage is alleged;
- (o) The number of alleged injuries, if any;
- (p) The number of alleged fatalities, if any.

8. Describe in detail the search criteria used by Country Coach to identify the claims identified in response to Request Nos. 6 and 7, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles.

Chronology-

9. Provide (A) a chronology and (B) a copy of all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions"), including, but not limited to, pre-productions tests, that relate to, or may relate to, the alleged defect in vehicles identified in response to Request No. 1 that have been conducted, are being conducted, are planned, or are being planned by, or for, Country Coach, its suppliers, customers, dealers, and/or its representatives or agents since Country Coach first became aware of the issue to the present date.

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 planning and for conducting the action; and
- (f) A summary of the actions, assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations and/or conclusions resulting from the action.

Provide this information in Microsoft Access 2003, Excel 2003, Word 2003 or a compatible format, entitled "PE08-046 Request Number Nine - Product Investigations & Evaluations."

Part Sales -

10. Provide a list of the major components or sub-assemblies (including predecessor part and assembly numbers) that are typically replaced in a vehicle that has experienced a failure due to the subject defect including, but not limited to, the power take off assembly and the power steering pump.

Provide a table that lists by calendar year, the quantity of each of the listed major component or sub-assemblies part / assembly number sold as replacement or service parts since January 1, 2003.

Provide this information in Microsoft Access 2003, Excel 2003, Word 2003 or a compatible format, entitled "PE08-046 Request Number Ten - Replacement Parts Sales."

Notices -

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

Manufacturer's Assessment -

12. Provide a data-based (quantified) assessment of the steering effort required for the operator to perform various maneuvers (a) with power steering assistance; and (b) without power steering assistance.
13. Furnish Country Coach's assessment of the potential risk(s) associated with the alleged defect including:
 - (a) The failure mechanism(s) and typical sequence of events that has, or may, precede or lead to the loss of power steering assist;
 - (b) The risk to motor vehicle safety posed by a vehicle being operated without the benefit of power steering assist;
 - (c) What warnings, if any, would be provided to (1) the vehicle operator; (2) pedestrians; and/or (3) nearby motorists that would indicate the alleged defect had occurred or was about to occur.

This letter is being sent to Country 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. Country Coach's failure to respond promptly and fully to this letter could subject Country 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 \$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 Country 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, Country Coach does not submit one or more requested documents or items of information in response to this information request, Country 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.

Country Coach's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office **September 17, 2008**.

Please refer to PE08-046 in Country Coach's response to this letter. If Country Coach finds that it is unable to provide all of the information requested within the time allotted, Country Coach must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Country 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 Country Coach then has available, even if an extension has been granted.

If Country Coach 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, Country Coach 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**. Country 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. Tom Bowman of my staff at (202) 366-2583.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Boyd". The signature is written in a cursive style with a large, looping initial "R".

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