

12/1/2009

Dear Blue Bird Owner

Subject: ODI / NHTSA Petition Review DP09-006 -- Vehicle Modifications
Conducted by Blue Bird under Campaign 07V-586

This letter is to inform affected owners that the Office of Defects Investigation (ODI) of NHTSA has received and accepted a petition regarding owner dissatisfaction with the remedy that Blue Bird Body Company ("Blue Bird") has developed and implemented to remedy the defects that Blue Bird identified in model year 2005 – 2007 Wanderlodge vehicles as described in Blue Bird Safety Recall 07V-586.

ODI has assigned this petition request number DP09-006. ODI has, and continues to receive, similar petition requests and complaints from various owners of Blue Bird Wanderlodge vehicles. ODI will endeavor to include each of these related petitions and complaints in consideration of DP09-006.

Background Information

On March 11, 2008, Blue Bird provided a Defect Report 07V-586 to NHTSA (revised from an earlier December 11, 2007, report) that summarized various defects that Blue Bird deemed to exist in 58 model year 2005 - 2007 Blue Bird Wanderlodge Model M450 motor homes (marketed as "450 LXi") manufactured from March 10, 2004, through September 27, 2006. The defects that Blue Bird identified and the proposed remedies are summarized in Appendix A of this letter.

It should be noted that Blue Bird may have implemented certain remedial modifications for specific vehicles that are not listed on the Defect Report such as adjustments to the air suspension to redistribute vehicle loads and requiring cargo (load limit) restrictions as evidenced by the warning labels applied to certain vehicle storage compartments. (There may also be other vehicle modifications that owners have had performed on their vehicles.)

While Blue Bird's Defect Report 07V-586 to NHTSA provides a general description of the various remedial modifications, ODI anticipates that the specific remedies appear likely to vary among the affected vehicles due to the custom-design nature of motor home vehicles.

ODI is considering the adequacy of the proposed remedy. One matter under consideration is how some limits articulated by and modifications proposed and/or implemented by Bluebird impact operation of these vehicles as motor homes.

As a preliminary comment, ODI is aware that Blue Bird may have prescribed cargo (load limit) restrictions on certain vehicles. It is not clear whether and/or to what extent these restrictions may affect vehicle functionality.

ODI's goal is to develop a preliminary assessment of this issue by early-January 2010.

Therefore, the Agency is attempting to collect as much pertinent data-based (objective) information as possible within the next 30 days.

Summary of Issues Raised by Petitioner and Other Complainants to NHTSA –

As of November 24, 2009, the Office of Defects Investigation has received several complaints from owners of the affected Blue Bird vehicles regarding various aspects of Blue Bird's 07V-586 Campaign.

ODI preliminarily has summarized the owner dissatisfaction views on the remedial modifications as follows:

- The Cargo Capacity in the storage bins (which includes loads on the vehicle platform above the affected storage bins) is unacceptable.
- Placement of the vehicle generator in a location where ventilation is restricted, risking over-heating leading to premature malfunction of the generator is unacceptable.
- The front axle is loaded in excess of its rating.
- The vehicle has impractical load and passenger restrictions, such as limiting the amount fuel and/or water that may be carried.

ODI has contacted Blue Bird, who tentatively has responded that the issue is miscommunication / misunderstanding with owners. Blue Bird has indicated that they plan to provide owners with some additional information.

ODI invites affected owners to submit information, and offers the following as a proposed framework for responses. Note that all information provided by owners pertaining to the petition are being provided solely as a voluntary submission by owners.

Note: The inquiries listed below are provided as a guide and are not all-inclusive. Owners should elaborate on any issues (such as those views listed above) if these (or other) issues have affected the operation of the vehicle. Owners should provide specific information related the remedially modified vehicle and/or its operation.

Note: As a suggested framework, owners may want to provide information and discuss the effects of the remedial modifications on their modified vehicle as it pertains to the two basic functions of a fully-functional motor home: (1) transportation / mobility; and (2) stationary living quarters.

The following information is pertinent to NHTSA's review. Please number the responses so that the responses may be easily aggregated and reviewed.

- 1) Provide the owner's name, address, phone number and e-mail contact address.
- 2) Provide the model, model year, and the complete (17 digit) VIN of the vehicle being described in the following responses.
- 3) Provide the date of purchase.
- 4) Provide the current vehicle mileage.
- 5) Provide a description of the intended vehicle operational use: Why was it purchased? How did the owner intend to use it? What load carrying capacity / operating features were expected / needed / represented?
- 6) Did the owner describe the intended use when purchasing the vehicle? (Provide names, dates, details if possible).
- 7) Describe the vehicle's actual use.

- 8) Provide a description of the vehicle modifications that were performed under 07V-586.

State if the vehicle has received no modifications associated with 07V-586 and the reasons why the modifications have not been completed.

State if the vehicle has received a portion of the proposed modifications associated with 07V-586 and why the remaining modifications have not been completed.

- 9) State whether the owner is currently able to use the modified vehicle.

Describe and quantify limitations in use that the owner has experienced in remedially modified vehicles.

Provide a description of the perceived limitations (if any) associated with remedially modified vehicles related to tire pressure, load carrying capacity, generator location, and/or other issues related to operation.

- 10) Provide a summary (with documentation, if available) of all changes in vehicle operating instructions / parameters that were provided to the owner following the vehicle modifications performed under 07V-586.
- 11) Provide a description of all malfunctions (vehicle component failures) associated with post-remedy vehicles if these malfunctions are reasonably associated with the remedy actions.
- 12) What was the vehicle cargo carrying capacity at time of purchase? How was the capacity changed and how has this affected the owners' ability to use the vehicle as originally intended?
- 13) What does the owner suggest be done to modify the vehicle so that the vehicle will be satisfactory to the owner?
- 14) Provide all other ideas, objections, points of information and/or supporting facts that owners believe may be pertinent to supporting the owners' petition.

- 15) Vehicle Axle / Tire Loads. If the owners intend to provide vehicle loading information, ODI makes the following suggestions:

Information regarding vehicle weights and loading has limited value unless the owner provides the condition of vehicle loading at the time that the vehicle was weighed, such as:

- a) full or partial (specify level) fuel;
- b) full or partial (specify level) fresh water;
- c) full or partial (specify) waste water;
- d) with or without driver;
- e) how many passengers and where seated; and
- f) how much cargo (estimated / measured weight of cargo and whether that constitutes completely unloaded, lightly loaded, normal, maximum, etc.).

Individual wheel end loads are generally more useful for analysis than overall axle loads. ODI realizes that obtaining individual wheel end loads is challenging for owners and owners may be unable to easily obtain this level of loading detail.

Owners should provide information in as much detail and as specifically and clearly as possible.

If there are any questions, you may contact:

Tom Bowman
Room 48-330
Office of Defects Investigation (ODI)
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Ave. S E
Washington, D.C. 20590

202-366-2583
tom.bowman@nhtsa.dot.gov

Sincerely,

Tom Bowman, NHTSA

Appendix A
Response to Petition DP09-006

In 07V-586, Blue Bird identified the following defects:

- (A) "The tie rod assemblies supplied to Arvin/Meritor [sic] on the front suspension were produced with steel tubing that did not meet the design specifications which could result in failure of the tie rod assembly when coach mileage approaches or exceeds 100,000 miles.
- (B) The front axle curb weight may exceed the specified 16,000 pounds weight rating.
- (C) Insufficient front tire inflation pressure reduces the weight rating of the front tires.
- (D) Improper alignment of the front suspension can cause premature tire wear and subsequent degradation of the structural integrity of one or both of the front tires."

In the amended 07V-586 report, Blue Bird states that the defect(s) will be corrected in the following manner:

"The original TRW left and right-hand tie rods ends will be replaced with the redesigned TRW tie rod ends. New certification labels showing a 17,000 pounds front GAWR, new labels stating weight limits for each of the three storage bays, and instruction for the application of these labels will be issued.

Appropriate replacement tires will be provided and the front steering alignment will be checked and corrected, if necessary. New tire data labels will be supplied requiring 130 PSI tire inflation pressure."