

DP09-006

March 23, 2010

Enclosed are the following documents for the Public File DP09-006

- (1) Supplemental Information – Owner # 4 (rec'd 3/23/10)
- (2) Owner # 20 (rec'd 3/12/10)
- (3) Owner # 21 (rec'd 3/12/10)
- (4) Owner # 22 (rec'd 3/18/10)

Tom Bowman, ODI

DP-09-006
OWNER #4
RESENT IN
LARGER FONT
(REQUESTED FOR
LEGIBILITY)

3/23/10

[REDACTED]
Warton, Ontario

N0H 2T0
519 534-4505
[REDACTED]

Mr Richard Boyd, Chief
Medium and Heavy Duty Vehicle Division.

Mr Dan Smith
Associate Administrator of Enforcement

Tom Bowman
Office of Defect Investigation.

February

23, 2010
via email and being mailed

Gentlemen,

I have read the response by Blue Bird to your requests to Defect Petition DP09-006 and herein list the errors, omissions, deception and deceit that I find in the reply.

Blue Bird response to NHTSA

<http://nhthqnwws111.odi.nhtsa.dot.gov/acms/docServlet/Artemis/Public/Pursuits/2009/DP/INRL-DP09006-39102P.pdf>

"Numerous steps to remedy the safety defect" --- Not really factual as the defect is the undercapacity of the front axle. The true fix, which was initially offered was a replacement front axle.. As a cost saving measure , this new axle plan was scraped and the the reconfiguration of the coach was planned. Obviously the first attempts at the reconfiguration failed and two additional phases were implemented over a 24 month period.

In the response, Blue Bird says-"The remaining open issues on CERTAIN COACHES are items that do not affect the safe and normal operation or use of these vehicles"

--- but the remaining open issues DO effect the safe and normal operation of the REST of the coaches. The sentence was written with devious intent. Some coaches left after the first stage, overweight, without placards and with owners being told not take 4 passengers or much cargo. If there were not issues that had to be still addressed, Blue Bird would NOT have done them with phases 2 and 3.

1. in fact, it was the requested upgrade to 17,000 pounds that necessitated the tie rod exchange.

b, The new tires were the same size, brand, load rating. Exactly the same, not increased capacity or strength as suggested.

c. Front end alignment was required because many coaches left the factory without proper alignment. Nothing to do with the recall although it was required again after the tie rod exchange.

e. Hadley changes were done to equalize the side to side loads on the front axle as the imbalance overloaded the tires. It was promoted as a method to lighten the loading on the front axle. Not true or possible. The changes to the system removed much of the automatic leveling features of the system as any automatic leveling would overload the front tires which have minimal reserve.

h. auxiliary compressor. This was demanded by NHTSA. The proper solution would be the upgrade to 365 tires and rims as done by PREVOST.

m. decals for under floor storage bay capacities. These decals are placed ambiguously . They are duplicated on the curb side and the road side of the same bay, giving the impression that the capacity is for each side when it is not. The numbers are calculated using the non standard 2 passengers and 1/4 water instead of the accepted CCC for these coaches of four passengers and full water. These bay decals are also the total limit for ABOVE and BELOW the floor. i.e. in the coach including fridge/freezer contents, pot,dishes and pantry.

n. larger capacity coolant reservoir--- this was required as part of phase two because the initial design failed

o larger capacity cooling fan--- Blue Bird had the owners return to exchange the fans and increase the ductwork in all of the previous relocations as the initial design overheated

improve access-- original gen set was on a slide out and this was not included in the relocation due to cost restraints. (all other RV's have slide outs in this location). These access doors were later added in phase two to try to appease owners.

p. relocate generator power control box---Blue Bird had to move this in all the modified coaches as they overheated in the original designs

q. remove steel generator support structure from the front generator compartment. This is part of stage three . A further attempt to lighten the front end as some of the coaches were still too heavy

3b "increased load carrying capacity of the front tires to over 17,000 lbs. SAME tire -- no change. 5% drop in tire pressure from the maximum puts the tire in overloaded condition. TPMS alarms are 10% to 12.5%

3e The control unit that effects the drive:tag ratio was changed from 60:40 to 65:35 in order to lighten the load on the front axle. the original system had the ratio at 60:40 , allowing the tag to go to its maximum of 13,000 pounds and thereafter any additional loading would then be taken by the drive axle. The change keeps the tag lighter (and therefore the front somewhat lighter) but puts more loading on the drive taking it over the DOT legal maximums with the coach unloaded.

3g. "(genset move) relocated approximately 1,200 lbs from the front of the coach" The genset weighs approx 900 pound total. The move to mid coach takes 450 pounds off the front axle.

"reduced approximately 37 cu ft".--- This is a number fudge

"45 of 51 coaches"---This is a convenient use of numbers at that particular time. Blue Bird was actively sealing these old genset locations in phase three after Dec 16th. On the coaches that had the space, there was a rating of 50 pounds or less and it was not watertight.

3k. "Owners manual addendum" -- Blue Bird has done a complete change in definitions and standards that were in the original manuals and on the placard above the dash in the coach. The definition of CCC "cargo carrying capacity" which stated cargo carrying capacity is that available AFTER full water and 4 passengers.

3m. again- placards in the bays are misleading-- not UNDERFLOOR only

The placards should be based on the accepted CCC definitions agreed to at the time of manufacture and sale, not with 1/4 water and 2 people.

3n. "Install larger capacity cooling reservoir" -Blue Bird had to return to the coaches to modify the relocation design as it overheated.

3m. "Install larger capacity cooling fan" The design overheated. It took them almost a year to correct this design.

3p. Relocate generator power control box. The controls were failing from excessive heat. Part of owners return for phase two

3q Remove steel generator support. Part of phase three and on going as Blue Bird tries to reduce the front axle loading. There is a real possibility of decreased safety in removal of structure from the coach as there are no engineered drawings done. One coach has had over 2700 pounds removed in total.

4. compromises -- Under floor storage space volume is decreased much more significantly then these numbers given by Blue Bird. There were four, half bays available before the gen set relocation. The two additional half bays are used for the entertainment centre , bar-b q, and tools. The genset relocation and the auxiliary compressor has taken over 1.5 of these bays. Only on a few coaches, the old genset slide out area is available for 50 pounds of wet storage . Therefore over 1/3 of the available storage space has been lost.

A compromise tactfully omitted is that the Cargo Carrying Capacity has been reduced and that impractical and unreasonable loading restrictions have become mandatory when there were none originally.

Depending on the coach, Blue Bird may indicate a 3000 pound CCC. But the bay decals indicate 1000 pounds. Adding full water and 2 persons brings this down to 500 pounds. This is the weight allowed in the bays AND in the coach forward of the drive axle; pantry, galley etc. That is unreasonable and does not allow the intended use of such a vehicle.

The remaining 2000 pounds of CCC must be carried behind the drive wheels: In the bathroom or bedroom where the minimal cupboards are used for clothes , linens , blankets etc. There is a single drawer under the bed that holds 2 pillows and a blanket for the guest bed/couch.

6. "Describe the process that blue Bird followed when weighing..." "Process for weighing units was the same before and after recall work was done. Units were weighed with full fuel and 1/4 water." --- Simply not true. Blue Bird began weighing the coaches with full water and calculated using 4 passengers as was the standard that they had agreed to and had indicated so in all the coaches. I have my copies of weight and forms taken by Blue Bird which were with full water. When Blue Bird decided to drop the new axle remedy, they changed the

weighing procedures to accommodate themselves and fictitiously make the numbers appear better.

I have earlier lodged an official complaint that Blue Bird knew of the overweight issue while they were manufacturing these units and that they ignored the safety issue. I have submitted proof . I have not had acknowledgement from NHTSA. Blue Bird's attempts at this remedy is not a fix of the defective part/problem but is a alteration of the vehicle, destroying its functionality as an RV for both short or extended use.

Blue Bird's limited remedy was done strictly as a cost saving measure with the knowledge and hope that the relatively few owners would, and could not protest strongly.

I respectfully request that NHTSA regard this issue with the same conviction as similar issues involving many more vehicles. Safety rules, laws and ethics shouldn't be affected by numbers.

Sincerely,

[REDACTED]

Additional

Some bay placards are calculated with $\frac{1}{4}$ water and no passengers (see James Robertson coach)

There have been coaches where the water system is leaking adding hundreds of pounds of weight as the water is absorbed in the bay floors. The Manabloc water system was modified because of the genset move. One of the main advantages of the Manabloc system that was destroyed by the genset move was that there were no joints to leak.

OWNER #20
1/3

To: [REDACTED] Owners

OFFICE OF DEFECTS &
INVESTIGATIONS

Re: Water leaks adding to weight problems

2010 FEB 28 P 12:02
MAR 12

I want to make you aware of some important information regarding water leaks. The rear stabilizer hydraulic pumps and generator cooling fan are located in bay five curbside of my 06 450LXI. Last year I was investigating a leak in the pumps, and noticed the ground wire for the pumps, which interestingly was screwed to an un-grounded location, was rotted off. While investigating the issue, I noticed a trace of rust along the edge of the formed stainless piece covering the marine plywood flooring. Further investigation led to a number of screws that were literally rusted to the point of being useless. For example, the genset cooling fan blower was held on by only one fastener.

I removed the stainless trim, and what was left of the useable hardware and pried up the plywood to get a view of the sub-floor of the coach. What I found was alarming to say the least. The plywood was severely deteriorated, and the insulation placed in the floor was soaked with water. At the time, I was unable to determine the source of the water, but thought it might have entered through the louvered bay door.

I recently spent several days correcting a leak that found water dripping into my shore power bay. That particular leak was caused by caulking issues in the shower. It caused floor damage under the shower, and also allowed water to get into the sub flooring. While on the chase for the shower leak, I decided to remove the trim panels hiding my Headhunter pump, Manibloc system, and other components...all re-located to bay four curbside of my coach. Upon doing so, I found delaminated plywood under the Headhunter, more loose hardware, and significant amounts of water in the bay. Bluebird moved the Headhunter and Manibloc system during the generator transplant.

During the process, they over tightened a section of brass pipe while installing it in a PVC tee cracking the tee. They also created leaks on the input and output sides of the Manibloc. As a result, I've had water leaking into the bays for over a year...all impossible to see as a result of the panels hiding the holding tanks and water pump, and because the coach bottom is sealed.

Previous work done left a fairly large hole in the floor of the bay, and sticking a finger inside results in a very wet digit. A prior BB employee told me that a couple of coaches with leaks required a complete "gutting" of the basements to correct the problems. The insulation I was able to reach was completely saturated, and it is obvious it will not dry out lying in the belly of the coach.

It is readily apparent the poorly executed move of the Headhunter and Manibloc created this problem. And, it will be impossible to correct without removing the holding tanks, much of the plumbing, and possibly electrical components. Who will do the work...and with what degree of integrity? And, how much additional weight at eight plus pounds per gallon has been added to the coach? I consider this latest debacle part of the recall work done on my coach.

I talked to Tom Bowman at NHTSA last year, and told him about water leaks being a possible cause of unwanted weight. I called him again several days ago to relate my latest discovery and leak related concerns. He is very interested in hearing about other coaches that might have similar issues. I strongly suggest that you take a close look at your coach basement. If you see any signs of rust around the trim pieces that hide the marine plywood in your basement, or any other water related damage, remove the screws and check further. If you find damage, and can pry up the flooring...do so. A former BB employee told me that once the insulation is wet, it will not dry out.

If you have had water leaks of any kind in the basement of your coach, and those leaks have not shown up on the ground, there's a good chance the water is still in your coach...just not where you want it. If you have water in the belly of your coach, it is now a permanent, indefinable addition to the weight of your vehicle.

Before repairing the Headhunter leaks in my coach I fabricated a container to catch water dripping from the cracked tee. I collected over a quart during a two day period. The tee has been leaking for over a year, and doing the math to determine the possible weight ramifications at eight plus pounds per gallon leads to an ugly conclusion. Please take the time to check your coach, and let NHTSA know of your findings.

OWNER #21
1 of 2

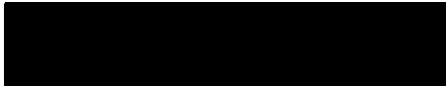
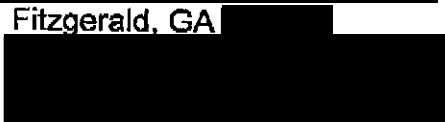
OFFICE OF DEFECTS &
INVESTIGATIONS

2010 FEB 28 A 11:09

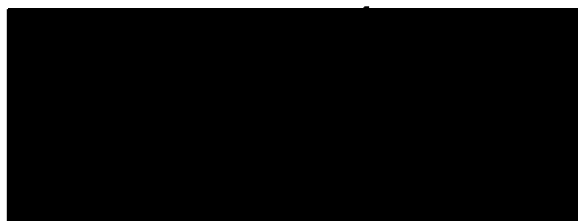
MAR 12

[Handwritten signature]

QUESTION
NO.

- 1 
Fitzgerald, GA 
- 2 Model: M450
Make: BLUEBIRD
Year: 2006
Vin: 1BBCRBG836W 
- 3 August 11, 2006
- 4 Current mileage 15,600
- 5 Purchased to take family on trips and camping as well as church groups which requires carrying luggage and food and supplies as well as fuel.
- 6 Refer to answer for number 5 – travel & camping
Load capacity:
- 7 Purchased to travel but has been very limited due to recall.
- 8 New high pressure tires
New tire rod assembly
Installed air compressor in motorhome to maintain 130 pounds of air pressure in front tires.
Front alignment
Scheduled to move generator from front to underneath storage area
- 9 Not able to use to the extent of what planned and not able to carry the weight necessary for extended trips.
- 10 Limited in passengers and cargo weight.
- 11 Right front light does not work; burglar alarm had to be repaired; side door on generator falls off; air conditioning in the rear gives problems; generator will shut off and had other problems and starting; vents in bathroom had to be repaired; switch cover in bedroom had to be replaced; had problems with paint peeling; light switch over table had to be replaced; repair TV because it was coming loose; rear wheel problems; step cover problems; more generator problems: light covers fall off.

- 12 Was not told but usage of vehicle was told to seller. Was told to carry only 100 pounds per compartment and this limits us to use it was planned for. Now they want to put generator in one of the under compartments which will take up space. We do not want it in that area. We will be concerned for overheating and fumes in coach. We would not have purchased it if the generator had been there.
- 13 Replace it because modifications will not allow us to use for what we purchased it.
- 14 Had a tire blow out.
Had a tire to wear out in less than 2000 miles usage.
- 15 A - Full
B - Partial
C - Partial
D - With driver
E - One in drivers seat



OWNER # 22

Tom Bowman
Room 48-330
Office of Defects Investigation (ODI)
National Highway Traffic Safety Administration
(NHTSA)
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OFFICE OF DEFECTS &
INVESTIGATIONS

2010 MAR 18 P 12:54

Dear Sirs

Regarding petition request number DP09-006.

Regarding item:

1
2
3
4

Jasper Ga.

2006Lxi
1BBCRBG816W

Purchased January 2006 New

Present Miles. 28000

This coach has a retail price of \$876000. Its use is 3- 5 months per year. We have lost the service of this coach for a total of 5 weeks due to the campaign. This coach has been back 3 times for this specific work. All phase of campaign are done. Ours has the roof awnings full length both sides so it adds to the weight. That said we lost the front storage bay (had this bay after the second trip to Ft Valley) We had to make another trip as they still didn't like the weight, they removed my front bay (probably used in another coach) and also removed my tow hooks and brackets.

Pg 1 of 2

Pg 2 of 2

The new air compressor has a faulty gauge (the needle is bent) can't accurately read the pressures. Talked with Allen Barbee he said they are aware of this and looking for guidance from the engineering group.

I have a hard time leveling the coach as they have programed it differently, (not resolved)

The 57 coaches that have been done are different, specifically the exhaust and air intake plumbing, check valves installed in some to correct the leveling problem. I have No check valve. I don't like the Rube Goldberg approach they have taken with my coach, these items were not detected before I picked it up.

The 2 inch water drain is no longer available

The first phase I didn't have access to the generator now I do.(kinda)

I just got back from Florida, I had around 1800 pounds of cargo. I travel with a little more the 1/4 water. No handling issues, it should have a payload close to 4000 pounds according to the original specs in Family Motorcoach Magazine.

One comment on the water in the bays, I drilled holes the hinge side of each bay door and got plenty of water, it has soaked the insulation under the floor. I'm not sure how much that weighs or how I'm going to dry it out. I sure hate the thought of tearing this thing up to correct this problem. (I'm sure someone knows about that at Bluebird)