



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE.
Washington, DC 20590

OCT 28 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tom Peck
Customer Service Manager
DRV, Inc. - Double Tree RV
1000 Interchange Drive
P. O. Box 235
Howe, Indiana 46746

NVS-214tb
PE10-040

Dear Mr. Peck:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE10-040) to investigate reports of wheel separations that are alleged to have occurred in certain "towable" Recreational Vehicles (RVs) designated as "Mobile Suites" and manufactured by DRV, Inc. (designated herein as "DRV" or "Double Tree RV").

According to the information that Double Tree RV provided to ODI on September 30, 2010, Double Tree RV has received reports of 5 wheel separations during the fifteen - month period between March 2009 and September 2010. Four of these reported wheel separations were reported during the six-month period between March 2010 and September 2010.

The listed wheel separations are associated solely with broken wheel mounting studs.

Following is a summary of the alleged (complete or partial) wheel separation incidents.

Incident Number	Incident Date	Vehicle Designation	Vehicle Build Date	Description	Estimated Mileage	Intervening Wheel End Servicing	Nominal Wheel Size
1	3/11/2009	36TKSB	8/18/2008	complete separation of "door side" wheel	Unknown	Unknown	16"
2	6/7/2010	36TK	7/16/2009	VOQ 10357609: partial separation of left rear wheel	Unknown	Unknown	16"
3	6/22/1010	36TKSB	2/3/2010	VOQ 10357608: complete separation of "door side" wheel	Unknown	Unknown	16"
4	7/22/2010	36TKSB	7/19/2010	complete wheel separation	Unknown	Unknown	16"
5	9/23/2010	36TKSB	2/2/42010	complete separation of "door side" front wheel	Unknown	Unknown	16"

Source: DRV email 9/30/10.

In order for my staff to evaluate this issue, ODI is requesting certain information pertinent to the issue of wheel separations.

Newly Reported Incidents-

The purpose of this section of this Information Request is to formalize the verbal request made to Double Tree RV on September 30, 2010, for Double Tree RV to provide prompt reports to ODI of all newly reported wheel separation incidents.

ODI requests prompt notification of any newly reported wheel separation incidents reported to Double Tree RV since there is a high likelihood that ODI would send a team to inspect the affected vehicle and/or relevant wheel end components and would like to conduct this inspection as soon as possible before repairs are performed so that the risk that components are discarded, lost, re-used, etc. is minimized. Accordingly, Double Tree RV must notify ODI within 48 hours when Double Tree RV learns of a wheel separation due to any cause,

whether or not confirmed, regardless of vehicle age, and whether or not loosening or breakage of the wheel mounting nuts and/or wheel mounting studs is the suspected cause.

This request pertains to all sizes and all capacities of wheels (16", 17.5", etc.) and axles installed and sold in vehicles by Doubletree RV.

This request is ongoing and terminates on **October 30, 2011**, but may be extended if circumstances warrant.

Each notification should be e-mailed to **tom.bowman@nhtsa.dot.gov** (phone 202-366-2583). The notification should provide as much of the following incident information as possible. Timeliness is critical. Any of the requested information that is not immediately available at the time of initial incident notification must be provided as soon thereafter as it becomes available.

Each notification should, at a minimum, include the following information:

1. Vehicle Identification Number (VIN) of trailer;
2. Build date of trailer;
3. Owner's name, address, and phone number;
4. Date of incident;
5. Location of incident;
6. Whether any property damage, personal injuries, and/or fatalities are alleged to have resulted from the incident;
7. Current location of trailer, wheel mounting nuts and studs, and separated wheel;
8. Name of Double Tree RV's supplier of the axle assembly installed in the incident vehicle;
9. Double Tree RV's part number of the axle assembly; and
10. The Gross Axle Weight Rating (GAWR) of the installed axles;
11. The name of Double Tree RV's supplier of the wheels installed in the incident vehicle;
12. Double Tree's part number for the wheels; and
13. The nominal diameter and nominal width of the wheels;
14. The composition of the wheels (aluminum or steel);
15. The number of wheel mounting studs;
16. The nominal diameter of the wheel mounting studs;
17. The nominal mounting circle of the mounting studs connecting the wheel to the hub;
18. Description of incident.

Information Requested –

ODI is requesting certain additional information from Double Tree RV.

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

Subject vehicle(s): All "Travel Trailer and Fifth Wheel" vehicles manufactured by Double Tree RV since January 1, 2005, and sold or leased in the United States.

Subject components: All wheels, brake drums or brake rotors, hubs, wheel mounting studs, and/or wheel mounting nuts installed in the subject vehicles.

Double Tree RV ("Double Tree"): 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 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 Double Tree RV (including all business units and persons previously referred to), who are or, in or after 2005 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; or
- 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.

Alleged defect: Loosening or separation of the wheels.

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 Double Tree RV, 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.

In order for my staff to evaluate the alleged defect, certain information is required. 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 Double Tree RV'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 2000 Access or Excel electronic format.

Production Data by Wheel Configuration -

1. Provide a table that identifies the number of Double Tree Recreational Vehicles built since January 1, 2007,
 - (a) By model year,
 - (b) By plant,
 - (c) By vehicle model,
 - (d) By nominal wheel rim diameter;

- (e) By nominal wheel composition (steel, aluminum, etc.);
- (f) By number of wheel mounting holes;
- (g) By nominal wheel mounting hole diameter;
- (h) By nominal mounting bolt circle diameter (nominal diameter of mounting hole centers);
- (i) By wheel locating design principle (hub piloted or stud piloted).

Provide the table in Microsoft Access 2000, Excel 2000, or a compatible format, entitled "Request Number One – Production Data by Wheel Configuration."

Vehicle and Wheel End Component Information for Wheel Separation Incident Vehicles -

2. For each wheel separation incident reported to Double Tree since January 2008, identify:
 - (a) The VIN;
 - (b) The Gross Vehicle Weight Rating (GVWR);
 - (c) The number of trailer axles installed in the vehicle;
 - (d) The Gross Axle Rating (GAWR);
 - (e) The vehicle build date;
 - (f) The manufacturing or assembly site at which the wheels were installed to the vehicle;
 - (g) Double Tree RV's part number for the axle assembly installed;
 - (h) The supplier of the axle assembly installed in the incident vehicle;
 - (i) Double Tree RV's part number for the wheels installed in the incident vehicle;
 - (j) The supplier of the wheels installed;
 - (k) The number of wheel mounting holes;
 - (l) The mounting bolt circle of the wheel mounting studs;
 - (m) The nominal diameter of the wheel mounting studs;
 - (n) a brief description of the material composition of the wheels installed (steel, aluminum, etc.); and
 - (o) whether the wheel is hub piloted or stud piloted.

Provide the table in Microsoft Access 2000, Excel 2000 or a compatible format, entitled "Request Number Two – Vehicle and Wheel End Component Information for Wheel Separation Incident Vehicles"

Procedures and Process/ Procedure Changes Relative to Wheel End Assemblies-

3. Describe and provide a copy of the wheel mounting and wheel nut torque procedures that were in effect as of January 2005. Include a copy of all instructions that Double Tree RV provides to transporters, dealers, and vehicle owners.

4. Describe all changes in the wheel mounting and wheel nut torque procedures implemented since January 2005 until the present, the date that the change was implemented, and the reason for the change.

Procedures and Quality Control Plans / Changes Relative to Wheel End Assemblies-

5. Describe and provide a copy of the manufacturing quality control plans, including frequency and method that were in effect as of January 2005 that Double Tree RV has used to assure the correct mounting of the wheel to the hub and for validating that the wheel mounting nuts have been correctly installed and torqued.
6. Describe all changes in the manufacturing quality control plans, including frequency and method, since January 2005 until the present that Double Tree RV has used to assure the correct mounting of the wheel to the hub and for validating that the wheel mounting nuts have been correctly installed and torqued.
7. Provide a data based summary that indicates the conformance to specification (or percent non-conforming) of the torque values recorded during production quality audits conducted for each manufacturing plant since January 2005.

Vehicle Design – Wheel Retention Clamp Joint Components and Design / Changes Relative to Wheel End Assemblies -

8. Describe all modifications or changes made by, or on behalf of, Double Tree RV in the design, material composition, manufacture, quality control, supply, or installation of the subject components (wheel, axle hub, wheel mounting studs, wheel mounting nuts), from January 2005 to date, which relate to, or may relate to, the alleged defect in the subject vehicles. 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;
 - (b) A detailed description of the modification or change;
 - (c) The reason(s) for the modification or change;
 - (d) The part numbers (service and engineering) of the original component;
 - (e) The part number (service and engineering) of the modified component;
 - (f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - (g) When the modified component was made available as a service component; and,
 - (h) Whether the modified component can be interchanged with earlier production components.

Note: All changes intended to improve the integrity and durability of the wheel mounting system that were implemented in response to wheel separation and wheel loosening should be clearly identified as such.

9. Describe all requested deviations from conformance to specifications received from all sources, the affected vehicle production, and provide a summary of the disposition for each of the requested deviations for the wheels, hubs, brake drum or rotor, wheel mounting studs, and wheel mounting nuts installed in the vehicles manufactured since January 2005.

Field Return Information -

10. Provide a list that identifies by VIN each of the following associated with reported wheel separation incidents (i.e. those incidents identified in response to Request No. 2, "Wheel Separation Incident Data"):
- (a) A description of the returned parts (If no components were returned from a listed incident, so state);
 - (b) A copy of the inspection report / observations conducted by Double Tree RV, Double Tree RV's suppliers, and/or sub-contractors on returned wheel end components including but not limited to wheels, hubs, brake drums or rotors, wheel mounting studs and/or wheel mounting nuts;
 - (c) The current location of the retained returned components (if known). If the inspected components have been scrapped, so state.
11. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned (*), or are being planned by, or for, Double Tree RV. 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 designing and for conducting the action; and
 - (f) A brief summary of the findings and/or conclusions resulting from the action.

(*). Include Double Tree RV's plans for investigating / resolving the wheel separation issue.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Manufacturer's Assessment -

12. Furnish Double Tree's detailed opinion of the alleged defect in the subject vehicles. Include an assessment of the following:

- (a) the causal or contributing factors;
- (b) the failure mode;
- (c) the risk to motor vehicle safety that it poses;
- (d) what warnings, if any, are provided to the operator and other persons.

Notices -

13. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Double Tree RV has received from suppliers and/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.
14. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Double Tree RV has issued to any owners, 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 Double Tree RV is planning to issue within the next 120 days.

This letter is being sent to Double Tree RV 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. Double Tree RV's failure to respond promptly and fully to this letter could subject Double Tree RV 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 \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond to ODI information requests.

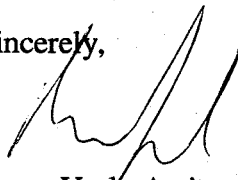
If Double Tree RV cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Double Tree RV does not submit one or more requested documents or items of information in response to this information request, Double Tree RV 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.

Double Tree RV's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **November 30, 2010**. Please refer to PE10-040 in Double Tree RV's response to this letter. If Double Tree RV finds that it is unable to provide all of the information requested within the time allotted, Double Tree RV must request an extension from me at (202) 366-6938 no later than five business days before the response due date. If Double Tree RV 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 Double Tree RV then has available, even if an extension has been granted.

If Double Tree RV 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, Double Tree RV 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-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Double Tree RV 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) 366-6961.

Sincerely,



Bruce York, Acting Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation