

INFORMATION Redacted PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)



JUL 22 2011

July 19, 2011

Mr. Bruce York, Acting Chief
National Highway Traffic Safety Administration
Office of Defects Investigation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: PE11 – 015

Dear Mr. York:

Based upon the review of your letter to Daniel Del Rio received on June 10, 2011 regarding Preliminary Evaluation PE11-015 the following information is provided per your request. The information provided herein was gathered by our staff after review of the ODI Resume Summary and Vehicle Owner's Questionnaire provided to us.

All documents provided to us point to a potential root cause to be the effects of corrosion. It is our belief that this potential corrosion could come from various agents used in certain states used to combat snow and ice during winter months. Therefore the "vehicle population" data provided in this response is based on vehicles in the traditionally identified "salt states" including CT, DC, IA, IL, IN, MA, MD, ME, MI, MN, MO, NH, NJ, NY, OH, PA, WI and WV. The remainder of the data reported in this response is in total to units produced and happen to be in the salt states identified above.

1. Separately by model year state the number of subject vehicles that Wheeled Coach has manufactured for sale or lease in the United States.

Response. There are 926 subject vehicles manufactured by Wheeled Coach during the period identified. See **Response 1 – Units Built** for this data. This information was gathered through Wheeled Coach's internal manufacturing records. This data was gathered July 13, 2011.

2. Separately by model year, for each subject vehicle manufactured to date by Wheeled Coach, provide the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;

- d. Model Year;
- e. Gross Vehicle Weight Rating (GVWR) and Combined Vehicle Weight Rating (CVWR);
- f. Date of chassis manufacture;
- g. Date warranty coverage commenced;
- h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease); and
- i. For each model vehicle identified in questions No. 1 and 2, state the location of the secondary remote battery terminal.

Response. See **Response 2 – Production Data** for this data. This information was gathered through Wheeled Coach's internal manufacturing records. This data was gathered July 13, 2011.

- 3. State the total number of each for each categories listed below, and separately (by category) provide copies of the following, received by Wheeled Coach, or of which Wheeled 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. Claims that were made to the chassis supplier;
 - c. Field reports, including dealer field reports;
 - d. Reports involving a crash, injury, or fatality;
 - e. Property damage claims;
 - f. Third-party arbitration proceedings where Wheeled Coach is or was a party to the arbitration (to include all pleadings, orders, depositions, and related documents); and,
 - g. Lawsuits (to include all pleadings, orders, depositions, and related documents) both pending and closed, in which Wheeled Coach is or was a defendant or codefendant.

Response. See **Response 3 – Claim Data** for this information. This information was gathered through Wheeled Coach's internal manufacturing records. This data was gathered July 13, 2011.

- 4. Separately and grouped by model for each item (complaint, field report, etc) within the scope of your response to Request No. 3, provide the following information:
 - a. Wheeled Coach's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 3 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Identify the final stage manufacturer, vehicle's VIN and body or serial number;
 - e. Vehicle's, model and model year;
 - f. Vehicle's mileage at time of incident;

- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether a fire is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any;
- m. Number of alleged fatalities, if any;
- n. Concern stated by customer;
- o. What parts were repaired, changed or replaced;
- p. Comment/notes, if any, by dealer/technician relating to claim and/or repair;
- q. Wheeled Coach's assessment of the claim, and
- r. A copy of any documents that were sent to the dealer or repair facility to aid or assist in repairing the problem.

Response. See **Response 4 – Claim Data.** This information was gathered through Wheeled Coach's internal manufacturing records. This data was gathered July 13, 2011.

5. State, by model year and model, a total count for all of the following categories of claims, collectively, that have been paid by Wheeled Coach to date that relate to, or may relate to, the alleged defect in the subject vehicles; warranty claims; extended warranty claims; claims for good will services that were provided; field, zone or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign. Separately, provide a copy of each claim. Also, state the date(s) in which Wheeled Coach provided NHTSA with a copy of the communication.

Response. See **Response 5 – Initial Claim Data.** This information was gathered through Wheeled Coach's internal manufacturing records. This data was gathered July 13, 2011.

6. Separately, by final stage manufacturer, for each such claim listed in No. 5, provide the following information:

Final stage manufacturer;

- a. Wheeled Coach's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer;
- k. Comment, if any, by dealer/technician relating to claim and/or repair; and
- l. Wheeled Coach's assessment of the claim.

Response. See **Response 6 – Claim Paid Data**. This information was gathered through Wheeled Coach's internal manufacturing records. This data was gathered July 13, 2011.

7. Produce copies of any and all service, warranty, and other documents that relate to, or may relate to the alleged defect in the subject vehicles, that Wheeled 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, special instructions or other documents or communications, with the exception of standard shop manuals. Also, include the latest draft copy of any communication that Wheeled Coach is planning to issue. Additionally, for each item:
 - a. State the date on which the document was provided to NHTSA pursuant to CFR 579.5;
 - b. Identify which vehicles are affected or involved; and
 - c. Provide a brief summary of the subject and objective of the action.

Response. No documents that relate or may relate to the alleged defect have been issued by Wheeled Coach as of this date.

- a. A draft copy of a proposed work instruction dated 7.12.2011 is included in this response.
- b. Vehicles affected or involved would be those identified in Response 1 of this correspondence.
- c. The purpose of this work instruction is to eliminate the possibility of loss of accessory electrical functions for the Wheeled Coach final stage conversion due to corrosion of the Ford O.E.M. secondary remote battery terminal as defined on page one of PE11-015.

This data was gathered by Wheeled Coach's internal staff July 12, 2011.

8. Describe and provide a copy of any/all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquires 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, Wheeled Coach. For each such action, provide the flowing information:
 - a. Action title or identifier;
 - b. The actual or planned start date;
 - c. A brief summary of the findings and/or conclusions resulting from the field action.

Response.

- a. Document # - W-278. Work Instruction For Installation Of Cable From Battery To ANL 400 Amps Fuse. Dated 7.12.2011.
- b. Modification activities per Item (a) above to commence on or before 8.15.2011.

- c. It appears that there is the potential for the Ford O.E.M. secondary remote battery terminal as defined on page one of PE11-015 to be affected by road salt and other anti-icing agents used on the public roads in the states identified in Response 1 of this correspondence. This in turn could have an adverse affect on Wheeled Coach's accessory power cable.

These actions were conducted by Wheeled Coach staff the week of July 11, 2011.

9. Describe all modifications or changes made by, or on behalf of Wheeled Coach in the design, supply, or installation of the subject component, 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 or performed as a field action;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part number (service and engineering) of the modified component;
 - e. When the modified component was made available as a service component; and,
 - f. Whether the modified component can be interchanged with earlier production components.

Response. Wheeled Coach did not design, supply or install the subject component (i.e. the Ford O.E.M. secondary remote battery terminal) as defined on page one of PE11-015. Wheeled Coach did install a positive power cable from our 400 amp fuse to the subject component, which in itself should not have caused the alleged corrosion failure of this component.

- a. On approximately July 1, 2011 a modification was made to production units to relocate Wheeled Coach's positive battery cable from the O.E.M. secondary remote battery terminal to the positive post of the O.E.M. battery.

Our anticipated date to implement the field action is to begin on or before August 15, 2011.

- b. Relocation of Wheeled Coach's positive cable from the Ford O.E.M. secondary remote battery terminal to the positive post of the O.E.M. battery for units in production. Field action for existing vehicle identified per the above.
- c. To eliminate Wheeled Coach's final stage warranty exposure on an O.E.M. furnished component.
- d. Not applicable.
- e. Anticipated on or before August 15, 2011.
- f. No.

This information was compiled by Wheeled Coach staff the week of July 11, 2011.

10. Furnish Wheeled Coach's detailed assessment of the alleged defect in the subject vehicle, including.

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety it poses; and
- e. What warnings, if any, the operator and other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning.

Response.

- a. Based on the information provided by NHTSA to Wheeled Coach it appears that corrosion of the O.E.M. secondary remote battery terminal is due to road salt and other caustic anti-icing agents used on the public roads of the identified states.
- b. Corrosion of the O.E.M. secondary remote battery terminal is the failure mechanism.
- c. When the O.E.M. secondary remote battery terminal fails due to corrosion it affects Wheeled Coach's accessory power cable.
- d. The risk to motor vehicle safety is minimal as the vehicle continues to operate including drive ability, headlights, tail lights, brake lights, etc.
- e. Accessory electrical functions such as siren, warning lights and interior patient compartment lights would be intermittent or fail to operate.

This information was compiled by Wheeled Coach staff the week of July 11, 2011.

It is clear from the information contained in the Vehicle Owner's Questionnaire dated February 7, 2011 that is tied to PE11-015 that the complainant clearly stated that this alleged concern is present on ambulances he has serviced other than the Wheeled Coach brand. It appears that since Wheeled Coach is the only brand of ambulance identified, the direction of ODI and the subsequent PE11-015 is directed to this company rather than the Ford E350 Type 2 ambulance population at large.

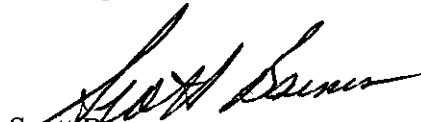
In our review of this matter we have identified only two (2) actual claims involving this alleged defect. While claims involving this alleged defect are extremely low and Wheeled Coach has no ability to address these "other" brands we will address this alleged defect in our vehicles by:

1. Directly routing the Wheeled Coach accessory power cable from the Ford O.E.M. secondary remote battery terminal to the positive battery post for ambulances in production since approximately July 1, 2011. This has been an internal correction to ambulances in the current and future manufacturing process.
2. Conducting a full Field Service Campaign for all vehicles identified in this response. We will provide the necessary replacement cable and other parts, as well as the labor costs, identified in the Work Instruction For Installation Of Cable From Battery To ANL 400 amps Fuse, document number W-278 included in this response.

This Field Service Campaign will commence on or before August 15, 2011. Each customer identified and their corresponding service center will be notified by mail and our call center as to the details of this Field Service Campaign. We will create an internal tracking program to ensure the identified vehicles have this correction implemented. We will maintain this Campaign until we can confirm the identified vehicles are corrected or are no longer in operation as an ambulance.

If I can provide any additional information in this matter please do not hesitate to contact me.

Best regards,

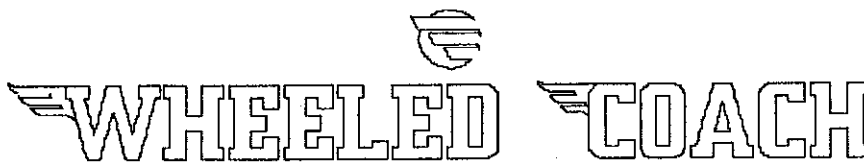


Scott Barnes
Vice President, Sales and Marketing

cc: Daniel Del Rio

AFA Number

32465



WHEELED COACH

ADVANCED FACTORY AUTHORIZATION

Status

Accounting

Salesperson Name

NERV

Action

COMPLETED

VIN #

Customer Name

Initials

DE

work order #

282446

DATE

3/29/2010

factory

Orlando

CAR Created

Yes

Current Mileage

22053

Registration returned

Yes

Delivery/Warranty Start Date

07/13/2009

Description

battery connection corroded at the jump start post replace the cable ends and seal.

PARTS SENT 04/13/10 03:10:06 PM

sending one jumper cable and two lugs.

Part Number	Quantity	Part Description	Part Cost	Part Sale

Code 1 - Parts & Labor

Source 1

Code 2 - Parts & Labor

Source 2

Code 3 - Parts & Labor

Source 3

Labor estimate

91-Inhouse warr Orlando

90.00

\$90.00

Code fill date

03/29/10

Accounting Information

Work Being Done By

nerv

fax 315-437-3007

Code 1 Total - Labor Only

91-\$90.00

Code 2 Total - Labor Only

Code 3 Total - Labor Only

Final Total - Labor

\$90.00

Signature

WCAFA-00-2003

WHEELED COACH WARRANTY CLAIM FORM

PLEASE FAX BACK TO 800-241-5177

THIS IS NOT AN AUTHORIZATION FOR REPAIR!

PLEASE PRINT

DATE 3/8/10 WHEELED COACH WORK ORDER ~~22053~~ 282446CUSTOMER [REDACTED] VIN# 1ED5534P68D [REDACTED]CURRENT MILEAGE ~~22053~~ 22053 DELIVERY DATE _____

PLEASE DESCRIBE PROBLEM WITH UNIT (be as specific as possible)

1st {BAT. Jumper Post Corrosion - install new Ford Bat Jumper
Term + Cable ends + Silicone. Connections}

Parts used:

Payable
or pay?

1 - Ford - 4C2Z14300-AAA - Bat Jumper Term. (46.50)
1 - 3/8 Cable lug - \$8.00
1 - 1/2 Cable lug - \$3.00

ESTIMATE AMOUNT: \$ 90⁰⁰ (labor) 147.50 (estimate required before an approval number can be issued)DSM/DEALER NERU

SHIPPING ADDRESS _____

CONTACT NAME Bill Smith PHONE# 315-525-1090SIGNATURE [Signature] FAX# 315-437-3007

All Corrosion Claims must have an estimate for repair
and digital photos attached to process claim.

Faxed 3/12/10

95.00
46.50
11.00
159.50

Invoice

Syracuse, NY

Date	Invoice #
3/29/2010	15371

Bill To	Vehicle Info
Wheeled Coach 2737 N. Forsyth Rd Winter Park, FL 32792 Attn: Warranty Dept.	

Mileage	Vehicle	R.O. #	Rep	Terms
22053	Menter 282446		BS	Net 30

Description	Qty	Rate	Amount
battery connection corroded at the jump start post replace the cable ends and seal WC is sending one jumper cable and two lugs AFA32465	1	90.00	90.00T

Subtotal	\$90.00
-----------------	---------

Sales Tax (0.00)	\$0.00
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Total	\$90.00
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Balance Due	\$90.00
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Status

Invoice

AFA Number

W 50105

ADVANCE FACTORY AUTHORIZATION

Salesperson Name

Pfund Superior

Action

Completed

VIN#

1FDSS34P0

Customer Name

Initiated

Work Order #

WCJBEHRE

292349

Date	CAR Created	Current Mileage	Registration Returned	Delivery/Warranty Start Date
05/14/2010	N	11,017	Y	09/11/2009

Description

the unit lost power-found the cable end was corroded-replaced

Part Number	Quantity	Part Description	Code	Part Cost	Labor Cost
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WLABOR	1.00	Warranty Labor	82	.00	70.00
.					
.					
.					
.					
.					
.					
.					
.					

WC	VEN	SUB	Labor Estimate
70.00	.00	.00	70.00

Accounting Information

Pfund Superior Sales
Tim
221 Chester Dr

LOWER BURRELL, PA 15068
724.339.1600 P
724.339.7509 F

Final Total - Labor

70.00

Signature

DATE RECEIVED

ACCOUNT NO. _____
DESCRIPTION _____
AMOUNT _____

Grand Superior Sales Company, Inc.
FUNERAL COACHES & AMBULANCES — NEW AND USED
221 CHESTER DRIVE • LOWER BURRELL, PA 15068
Phones: 724-339-1600 / 339-2473 • Fax: 724-339-7509

DATE RECEIVED
\$48,110.09
YEAR MAKE MODEL
2009 Ford
SERIAL
PHONE
LICENCE
SPEEDOMETER 14017

Name _____
Address _____
City, State, Zip _____

LAURENCE, PA

Replaced removed off end of power stroke

Appr. # 50105

LABOR

Total Labor	
Total Parts	
Sales Tax	
TOTAL AMT.	70 00

WC 09-22

WHEELED COACH

WHEELED COACH WARRANTY CLAIM FORM

PLEASE FAX BACK TO 800-241-5177

THIS IS NOT AN AUTHORIZATION FOR REPAIR!

PLEASE PRINT

DATE 5-13-10 WHEELED COACH WORK ORDER 292349CUSTOMER [REDACTED] VIN# 1F08834P09 [REDACTED]CURRENT MILEAGE 11017 DELIVERY DATE 9-11-09

PLEASE DESCRIBE PROBLEM WITH UNIT (be as specific as possible)

Customer lost all power to AMB conversion items
found main power cable END corroded off power wire under
truck, Replace cable END, check all equipment

ESTIMATE AMOUNT: \$ 70.00 (estimate required before an approval number
can be issued)DSM/DEALER Pfund Superior SalesSHIPPING ADDRESS 221 Chester Dr
Lower Burrell Pa 15068CONTACT NAME Tim PfundPHONE# 724 339-1600SIGNATURE [Signature]FAX# 724 339-7509

All Corrosion Claims must have an estimate for repair
and digital photos attached to process claim.



WORK INSTRUCTION FOR INSTALLATION OF CABLE FROM BATTERY TO ANL 400 Amps FUSE

Document # : W - 278
Issue Date : 07.12.2011
Revision # : 1
Revision Date : 07-12-2011
Written by : Field Srv. Eng.
Page : 1 of 2

1. PURPOSE

The purpose of this work instruction is to eliminate the possibilities of corrosion at the OEM Jump Stud causing power loss to the ambulance conversion.

2. DEFINITIONS AND ABBREVIATIONS

IN-LB = *Inch Pounds*

3/0 – *size of the battery cable,*

R/G – *color code of the battery cable, RED/GREEN tape at each end.*

3. RESPONSIBILITY AND APPLICABILITY

The technical service mechanic is responsible to follow this work instruction for proper installation of the 3/0 RED/GREEN cable from the positive post of the battery to the ANL 400 Amps Fuse.

COMPENSATION FOR THIS WORK WILL BE 1 hours of LABOR @ \$65 per hour.

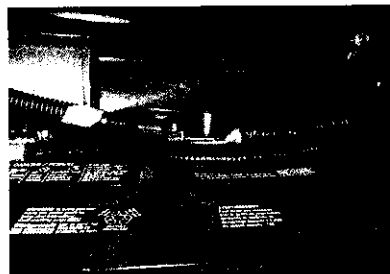
4. WORK INSTRUCTION

1. Disconnect all batteries before commencing any work.
2. Remove the RED/ GREEN cable from the ANL 400 Amp fuse (see picture 3) located in the weather proof box, located on the back of the step well to the OEM Jump stud located on the frame rail passenger side.
3. Add the new RED/ GREEN cable from the ANL 400 Amp fuse (see picture 3) located in the weather proof box which is located on the back of the step well and then re-grommet, re-seal, re-apply dielectric grease liberally (customer supplied), and re-install the cover.
4. Remove the Red plastic cover at the bottom of the jumper cable as you see it in the picture numbered 4 with the razor knife.
5. Connect the other end of the RED/ GREEN cable to the top of the positive battery stud (see picture 2).
6. Apply dielectric grease to the battery post liberally.
7. Re-Install the battery cover.

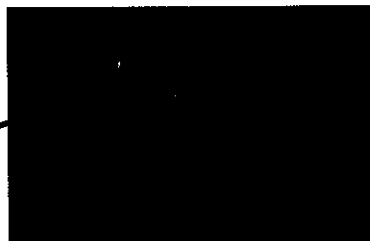
Ford OEM
Jump Stud
Picture 1.



Add RED/
GREEN cable to
the positive
battery post
Picture 2.



Ford OEM Jump
Stud Cable
(Battery End)
Picture 4.



The finished product
should resemble this
picture
Picture 3.

