Road Rescue
AN ALLIED SPECIALTY VEHICLES COMPANY
In Service for Life

DEFECTS &
INVESTIGATIONS
2013 MAR 13 A 8:32

CERTIFIED MAIL – 7009 2820 0004 1353 0484
RETURN RECEIPT REQUESTED

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

March 5, 2013

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

Re: PE12-037

Dear Mr. York:

This correspondence is in response to your letter to Daniel Del Rio received on January 29, 2013 regarding Preliminary Evaluation PE12-037. The following information is provided per your request. The information provided herein was collected and reviewed by our staff after receipt of your letter.

For historical reference your staff should know that I am the Vice President of Sales and Marketing for Wheeled Coach Industries, Inc. On September 20, 2010, Wheeled Coach Industries, Inc. purchased Road Rescue from Spartan Motors, Inc. Wheeled Coach Industries, Inc. produces two brands of ambulances under the Wheeled Coach and Road Rescue brand labels. Therefore your staff should know that during the course of this investigation you will receive emails from me that could come to you from either a Wheeled Coach or a Road Rescue email address.

During the course of this investigation our staff reviewed warranty and customer data available to us prior to the September 20, 2010 purchase date as well as post purchase data which migrated to our current systems. I believe we have accurately reviewed the data and have a complete picture of the situation. From an antidotal perspective, you should know that we were very public in our announcement of Wheeled Coach Industries' purchase of Road Rescue and continue to deal with pre-purchase Road Rescue customers on a regular basis. I can assure you that based on pre-purchase customer claims for cosmetic related Road Rescue warranty issues, any failed electrical systems would have been on our radar early on. This is not the case and I am confident we are accurately reporting the facts to you in this response.

1. State, by model and model year, how many subject vehicles Road Rescue has manufactured for sale or lease in the United States. For each vehicle provide the following:

   a. VIN;
   b. Make
   c. Model;
   d. Date of manufacture; and

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e. Date warranty coverage commenced.

Response. There are eight (8) subject vehicles manufactured by Road Rescue during the period identified. See the **Production Data** table on tab 1 for this data. This information was collected and reviewed by the staff of Wheeled Coach Industries, Inc. from both **pre-purchase** and **post purchase** records for Road Rescue ambulances.

2. State the number and provide copies of each of the following, received by Road Rescue, which relate to, or may relate to, the alleged defect in the subject vehicles:

   a. Consumer / fleet complaints;
   b. Field reports;
   c. Reports involving a crash, injury, or fatality;
   d. Reports involving a fire;
   e. Property damage claims;
   f. Third-party arbitration proceeding where Road Rescue is or was a party to the arbitration; and
   g. Lawsuits, both pending and closed, in which Road Rescue is or was a defendant or codefendant.

Response. See **Response 2** table on tab 2 for this data. This information was collected and reviewed by the staff of Wheeled Coach Industries, Inc. from both **pre-purchase** and **post purchase** records for Road Rescue ambulances.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

   a. Cab ID number;
   b. VIN;
   c. Vehicle's owner or fleet name (and fleet contact person), address, and telephone number;
   d. Vehicle's make, model and model year;
   e. Vehicle's mileage at time of incident, if known;
   f. Failed part number;
   g. Incident date;
   h. Report date;
   i. Concern stated by customer;
   j. Whether a fire was reported;
   k. Date warranty coverage commenced; and
   l. Road Rescue's assessment of the incident.

Response. See **Request Number Two Data** on tab 3 for this data. This information was collected

and reviewed by the staff of Wheeled Coach Industries, Inc. from both **pre-purchase** and **post purchase** records for Road Rescue ambulances.

4. State, by make, model, and model year, a total count for all of the following categories of claims, collectively, that have been paid by Road Rescue to date that relate to, or may relate to, the alleged defect in the subject components: 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, for each such claim, state the following information:

   a. Road Rescue's claim number;
   b. VIN;
   c. Vehicle's owner or fleet name (and fleet contact person) and telephone number;
   d. Vehicle's make, model, and model year;
   e. Vehicle's build date;
   f. Warranty start date;
   g. Incident date;
   h. Report date;
   i. Vehicle's mileage at time of repair;
   j. Repairing facility's name, telephone number, and address;
   k. Labor operation number;
   l. Problem code;
   m. Replacement part number(s) and description(s);
   n. Concern stated by customer; and
   o. Comment, if any, by dealer/technician relating to claim and/or repair.

Response. See **Warranty Data** on tab 4 for this data. This information was collected and reviewed by the staff of Wheeled Coach Industries, Inc. from both **pre-purchase** and **post purchase** records for Road Rescue ambulances.

5. Provide copies of any service or technical bulletins, product improvement campaigns, announcements, or advisories, and all other communications concerning the alleged defect in the subject vehicles that Road Rescue has issued or is considering issuing to fleets, dealers, zone offices, or field offices. If Road Rescue has drafted any such communications, furnish a copy of the draft. For any such communication that has been issued, identify, by name, address, telephone number, and contact person, each entity to which it was sent, the date on which the communication was sent, and the specific equipment to which the communication pertained. For each such communication:

a. Provide a complete chronology, listing all activities or events, including, but not limited to, incidents, which led Road Rescue to issue the communication;
b. Provide a listing (in chronological order) of all testing through which the need for the communication was identified and/or assessed, even if the testing was being conducted for another purpose. Please provide a copy of all relevant information from each test listed; and
c. State the number of repairs and/or replacements paid for by Road Rescue that resulted from the communication identified. List your response by repairing dealer (and include the dealer's name, address, and telephone number).

Response. Wheeled Coach Industries, Inc. has not issued any service or technical bulletins, product improvement campaigns, announcements, advisories, or other communications concerning the alleged defects in the subject vehicles. This statement includes both **pre-purchase** and **post purchase** record review by the staff of Wheeled Coach Industries, Inc. for Road Rescue ambulances.

a. Not applicable.
b. Not applicable.
c. This information is listed under **Warranty Data** on tab 4 of this response.

6. Provide a detailed chronology of all events leading up to the alleged defect starting from the time Road Rescue first became aware of this issue to present. Describe how Road Rescue first became aware of the potential problem and state the date on which Road Rescue first became aware of the possibility of the alleged defect. Include all information including dates of both internal and external meetings, meetings with fleets, manufacturers, or any others involved in this issue and discuss the resolution, planned action, and/or the manner in which Road Rescue addressed this issue. Also separately, provide a copy of any/all document(s) and presentation materials that were used during the meeting(s) whether Road Rescue generated the document(s) or the document(s) were generated by others.

Response.

a. **January 29, 2013** – First notification of an alleged defect in MY2008 Road Rescue Sprinter 2500 ambulances to Wheeled Coach Industries, Inc. upon receipt of your letter advising that a Preliminary Evaluation (PE12-037) had been opened based on a complaint received from an ambulance fleet regarding electrical issues with two of their emergency response vehicles.
b. **January 30, 2013 – February 5, 2013** – Initial Wheeled Coach Industries, Inc. staff review of records and documents to review this alleged defect. This initial review determined that there was no basis to require submission of a PART 573 report to NHTSA regarding the alleged defect identified in PE12-037.
c. **February 6, 2013 – February 28, 2013** – Continued review by the staff of Wheeled Coach Industries, Inc. of both **pre-purchase** and **post purchase** records and documents regarding

the MY2008 Road Rescue Sprinter 2500 ambulances and the alleged defect identified in PE12-037.

d. **March 1, 2013 – Present** – Preparation by the staff of Wheeled Coach Industries, Inc. this response to PE12-037.

7. Describe all modifications or changes made by, or on behalf of, Road Rescue in the design, material composition, manufacture, quality control, supply, or installation of the subject components, from the start of production 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 on which the change was incorporated into production;
   b. A detailed description of the change;
   c. The reason(s) for the change;
   d. The part numbers (service and engineering) of the original components;
   e. The part number (service and engineering) of the modified component;
   f. Whether the original unmodified component was withdrawn from production, inventory(s) 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.

Response.

a. Not Applicable. No modifications or changes made to the design, material composition, manufacture, quality control, supply, or installation that relate to, or may relate to, the alleged defect in the subject vehicles.
b. Not Applicable.
c. Not Applicable.
d. Not Applicable.
e. Not Applicable.
f. Not Applicable.
g. Not Applicable.
h. Not Applicable.

8. 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, Road Rescue. 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.

Response.

a. Not Applicable. No assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively "action") that relate to, or may relate to, the alleged defect in the subject vehicles have been conducted, are being conducted, or are being planned in this regard.
b. Not Applicable.
c. Not Applicable.
d. Not Applicable.
e. Not Applicable.
f. Not Applicable.

9. Furnish Road Rescue's assessment of the alleged defect in the subject vehicles, including:

a. The causal or contributory factor(s);
b. The failure mechanism(s);
c. The failure mode(s);
d. The risk to the patient and the vehicle's mission when a patient is being transported and cared for and the cab experiences a loss of power;
e. The risk to motor vehicle safety if an ambulance loses exterior lighting and sirens while on the road; and
f. What warnings, if any, the operator and other people both inside and outside the vehicle would have that the alleged defect had occurred?

Response.

a. Of the eight (8) subject vehicles manufactured by Road Rescue, seven (7) incorporate the same electrical system design and components in the ambulance "conversion" produced by Road Rescue. There is one (1) subject vehicle that incorporated a completely different design and had some of the same electrical components as the other seven (7).

The seven (7) subject vehicles referenced above incorporated a "multiplex" (digital) based electrical system. These units are identified below:

1. WDOPE74568[redacted] – Road Rescue Work Order # 5537
2. WDOPE7457[redacted] – Road Rescue Work Order # 5659
3. WDOPE7459[redacted] – Road Rescue Work Order # 5560
4. WDOPE745X[redacted] – Road Rescue Work Order # 5662
5. WDOPE7450[redacted] – Road Rescue Work Order # 5661
6. WDOPE7459[redacted] – Road Rescue Work Order # 5518

7. WDOPE7457[redacted] – Road Rescue Work Order # 5668

The eighth (8th) subject vehicle, referenced above, incorporated a "PC" (analog) based electrical system. This unit is identified below:

1. WDOPE74588[redacted] – Road Rescue Work Order # 5519

During our staff review of both **pre-purchase** and **post purchase** records for the subject vehicles there are only two (2) of the subject vehicles that were identified with a history of electrical system customer complaints, and on said two (2) subject vehicles where a warranty claim was filed for processing. Both subject vehicles were purchased by the fleet customer filing the ODI complaint for PE12-037. These units are:

1. WDOPE74588[redacted] – Road Rescue Work Order # 5519
   Contributory Factor – Failure of the "Master" power disconnect switch utilized in the Road Rescue electrical system. See **Warranty Data** on tab 4 of this response for additional details.
2. WDOPE745685310920 – Road Rescue Work Order # 5537
   Contributory Factor – Failure of the "Master" power disconnect switch utilized in the Road Rescue electrical system and "programming disruption/failure of the "multiplex" primary electrical supply node. See **Warranty Data** on tab 4 of this response for additional details. (NOTE: These two (2) units have different Road Rescue designed electrical systems. The "Master" power disconnect switch is the same even though one is an analog electrical system and the other is a digital electrical system.

The remaining six (6) subject vehicles have no history of electrical system customer complaints or warranty claims for the electrical system. (NOTE: Three (3) of these six (6) subject vehicles had cosmetic (Formica cracks) warranty claims filed against them).

b. WDOPE745885[redacted] – Road Rescue Work Order # 5519
   Failure Mechanism – Intermittent interruption of electrical power to the Road Rescue ambulance conversion. "Master" power disconnect switch replaced. See **Warranty Data** on tab 4 of this response for additional details. (NOTE: While the "Master" power disconnect switch was replaced under warranty it is the belief of Road Rescue that the customer's electrical issues were due to installed electrical components "post" delivery by their organization or a contractor/service facility chosen by them.

   WDOPE74568[redacted] – Road Rescue Work Order # 5537
   Failure Mechanism – Intermittent interruption of electrical power to the Road Rescue ambulance conversion. "Master" power disconnect switch replaced. This unit featured a different electrical system design (multiplex system) and the primary node in that system lost its programming and was replaced. See **Warranty Data** on tab 4 of this response for additional details. (NOTE: While the "Master" power disconnect switch and the primary multiplex node were replaced under warranty it is the belief of Road Rescue that the

customer's electrical issues were due to installed electrical components "post" delivery by their organization or a contractor/service facility chosen by them.

c. WDOPE745885[redacted] – Road Rescue Work Order # 5519
Failure Mode – Failure of "Master" power disconnect switch terminates flow of 12vDC electrical service to the Road Rescue ambulance conversion. Chassis function and drivability is not affected.

WDOPE745685[redacted] – Road Rescue Work Order # 5537
Failure Mode - Failure of "Master" power disconnect switch terminates flow of 12vDC electrical service to the Road Rescue ambulance conversion. Failure of/loss of programming in the primary multiplex node can affect portions of 12vDC electrical service, including complete loss of power to the Road Rescue ambulance conversion. Chassis function and drivability is not affected.

d. The risk to motor vehicle safety is minimal as the vehicle continues to operate including drivability, headlights, horn, 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.

Mr. York, it is my belief that this complaint was filed at your office as the customer, Impulse Ambulance, has no other venues to which he can complain. I personally met with Impulse's General Manager at an Open House at our California dealer's location sometime in 2011. He complained to me of some electrical issues with one of his two Road Rescue Sprinter 2500 ambulances. I apologized for his issues, and stated that I would work with our dealer to resolve his concerns. I further informed him that I was not intimately informed as to the history of these ambulances, when they were purchased and when the warranty might expire. I remember telling him that regardless of the warranty expiration date we would honor the warranty for the electrical issues he was describing and that he did not need to worry about the "warranty clock running out". His reply was that he preferred that I re-purchase these two ambulances from him so he could "just be done with them". I remember stating that I would not consider re-purchase of the ambulances based our conversation at that time. I further reminded him that my company, Wheeled Coach Industries, Inc., did not manufacture those ambulances, but as the new owner of Road Rescue I would make sure the original warranty obligations would be honored.

The California state statute that deals with automotive warranty rights (Lemon Law) is Song-Beverly Warranty Rights, California Civil Code 1790. Paragraph C of that document defines who is covered. That paragraph reads **"The law applies to a new motor vehicle that is bought or used primarily for personal, family or household purposes. The law also applies to a new motor vehicle with a gross vehicle weight under 10,000 pounds that is bought or used primarily for business purposes by a person, including a partnership, limited liability company, corporation, association, or any other legal entity, to which not more than five motor vehicles are registered in this state"**. It is my understanding that Impulse Ambulance has more than five (5) vehicles in their corporate fleet. Therefore the Song-Beverly Warranty Rights document provides them no relief other than a civil suit in California.

I feel compelled to inform you that as of this writing, Impulse Ambulance is in arrears to our Road Rescue dealer, Emergency Vehicle Group, for $1,723.49 for service work performed at the request of Impulse Ambulance. This is non-warranty related service work.

Of the eight (8) subject vehicles that are covered in your PE12-037 only two (2) have had any electrical system related complaints or warranty claims. As reported above those two (2) ambulances are owned by the complainant, Impulse Ambulance. Other than the conversation I had with Impulse's General Manager, there has been no verbal or written correspondence between Impulse Ambulance and my office in this regard. I am confident that this is a consumer that is abusing your good office with this complaint, rather than seeking a traditional legal remedy. The data provided to you in this response clearly shows there is not a systemic electrical system issue with the subject vehicles and the alleged complaint.

Should you require any additional information or have any additional questions please do not hesitate to contact me.

Best regards,

Scott L. Barnes
Vice President, Sales and Marketing

cc: Christopher Riley, Barnes and Thornburg, LLP
Ron Sorensen
Bob Collins