U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

December 17, 2013

NVS-215cg
EQ 13-006
13E-039
13E-067

Via USPS Certified Mail
Attn: Materials Manager
American Surplus & Manufacturing Inc.
3134 E Highway 7 PO Box 326
Montevideo, MN 56265

Subject: Fastec Door Locks

Dear Materials Manager:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain travel trailer door locks sold by Fastec Industrial Corporation (Fastec) that several vehicle manufacturers have decided contain a safety related defect. This investigation has been assigned the identification EQ 13-006.

The purpose of this letter is to make you aware of a potential safety defect in the vehicles and/or equipment your company may have manufactured, and to remind you of your responsibility under Federal Law.

In a letter dated July 11, 2013, Fastec notified the NHTSA that it decided a defect exists in certain door locks manufactured between January 2006 and April 2013 with a keyed paddle handle and deadbolt. It may be possible to remove the key from the lock while it is in a horizontal, 9 o'clock position, potentially jamming the deadbolt. If the key is removed while in the 9 o'clock position, the interior side of the door lock may be inoperable. A passenger inside the recreational vehicle may not be able to exit the vehicle without using the emergency exit, increasing the risk of injury. This matter was assigned recall number 13E-039.

We have now received similar reports from other vehicle and equipment manufacturers. Specifically, in a letter dated November 1, 2013, Lippert Components, Inc., (Lippert), notified the NHTSA of the same defect it determined exists in certain model doors. This recall was assigned recall number 13E-067. Lippert reported that it sold **1108** of these doors to American Surplus & Manufacturing Inc., (your company), for assembly into recreational vehicles and/or equipment. Accordingly, we require the following information:

1. State whether your company has made or intends to make a decision that vehicles and/or equipment it manufactured with the subject doors contain a safety defect, and will notify its purchasers by conducting a safety recall.

2. If your company does not believe that the vehicles and/or equipment it manufactured with the subject doors contain a safety defect, provide all information, supporting documentation, and/or test results that support this opinion.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn that a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

Should you decide your vehicles contain a safety defect, your company that it is required to issue timely notification to owners who may have purchased vehicles with the subject doors. Within 60 days of its filing of its Part 573 notification and report with NHTSA, in advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles and/or equipment. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Part 573 notification and report, and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;

b. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,

c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state.

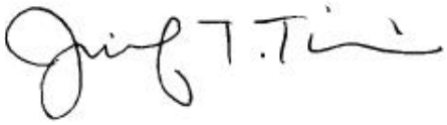
If your company does not agree that vehicles it manufactured with these doors are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), 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. Your company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ 13-006**. If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail or by e-mail to: rmd.odi@dot.gov **and** cynthia.glass@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

December 17, 2013

NVS-215cg
EQ 13-006
13E-039
13E-067

Via USPS Certified Mail
Attn: Materials Manager
AP Products
200 Jay Street
Coldwater, MI 49036

Subject: Fastec Door Locks

Dear Materials Manager:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain travel trailer door locks sold by Fastec Industrial Corporation (Fastec) that several vehicle manufacturers have decided contain a safety related defect. This investigation has been assigned the identification EQ 13-006.

The purpose of this letter is to make you aware of a potential safety defect in the vehicles and/or equipment your company may have manufactured, and to remind you of your responsibility under Federal Law.

In a letter dated July 11, 2013, Fastec notified the NHTSA that it decided a defect exists in certain door locks manufactured between January 2006 and April 2013 with a keyed paddle handle and deadbolt. It may be possible to remove the key from the lock while it is in a horizontal, 9 o'clock position, potentially jamming the deadbolt. If the key is removed while in the 9 o'clock position, the interior side of the door lock may be inoperable. A passenger inside the recreational vehicle may not be able to exit the vehicle without using the emergency exit, increasing the risk of injury. This matter was assigned recall number 13E-039.

We have now received similar reports from other vehicle and equipment manufacturers. Specifically, in a letter dated November 1, 2013, Lippert Components, Inc., (Lippert), notified the NHTSA of the same defect it determined exists in certain model doors. This recall was assigned recall number 13E-067. Lippert reported that it sold **5386** of these doors to AP Products, (your company), for assembly into recreational vehicles and/or equipment. Accordingly, we require the following information:

1. State whether your company has made or intends to make a decision that vehicles and/or equipment it manufactured with the subject doors contain a safety defect, and will notify its purchasers by conducting a safety recall.

2. If your company does not believe that the vehicles and/or equipment it manufactured with the subject doors contain a safety defect, provide all information, supporting documentation, and/or test results that support this opinion.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn that a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

Should you decide your vehicles contain a safety defect, your company that it is required to issue timely notification to owners who may have purchased vehicles with the subject doors. Within 60 days of its filing of its Part 573 notification and report with NHTSA, in advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles and/or equipment. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Part 573 notification and report, and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;

b. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,

c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state.

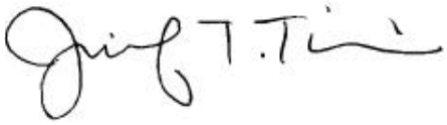
If your company does not agree that vehicles it manufactured with these doors are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), 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. Your company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ 13-006**. If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail or by e-mail to: rmd.odi@dot.gov **and** cynthia.glass@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

December 17, 2013

NVS-215cg
EQ 13-006
13E-039
13E-067

Via USPS Certified Mail
Attn: Materials Manager
Bluegrass Trailer Sale Inc.
PO Box 397
Lebanon Junction, KY 40150

Subject: Fastec Door Locks

Dear Materials Manager:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain travel trailer door locks sold by Fastec Industrial Corporation (Fastec) that several vehicle manufacturers have decided contain a safety related defect. This investigation has been assigned the identification EQ 13-006.

The purpose of this letter is to make you aware of a potential safety defect in the vehicles and/or equipment your company may have manufactured, and to remind you of your responsibility under Federal Law.

In a letter dated July 11, 2013, Fastec notified the NHTSA that it decided a defect exists in certain door locks manufactured between January 2006 and April 2013 with a keyed paddle handle and deadbolt. It may be possible to remove the key from the lock while it is in a horizontal, 9 o'clock position, potentially jamming the deadbolt. If the key is removed while in the 9 o'clock position, the interior side of the door lock may be inoperable. A passenger inside the recreational vehicle may not be able to exit the vehicle without using the emergency exit, increasing the risk of injury. This matter was assigned recall number 13E-039.

We have now received similar reports from other vehicle and equipment manufacturers. Specifically, in a letter dated November 1, 2013, Lippert Components, Inc., (Lippert), notified the NHTSA of the same defect it determined exists in certain model doors. This recall was assigned recall number 13E-067. Lippert reported that it sold **119** of these doors to Bluegrass Trailer Sale Inc., (your company), for assembly into recreational vehicles and/or equipment. Accordingly, we require the following information:

1. State whether your company has made or intends to make a decision that vehicles and/or equipment it manufactured with the subject doors contain a safety defect, and will notify its purchasers by conducting a safety recall.

2. If your company does not believe that the vehicles and/or equipment it manufactured with the subject doors contain a safety defect, provide all information, supporting documentation, and/or test results that support this opinion.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn that a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

Should you decide your vehicles contain a safety defect, your company that it is required to issue timely notification to owners who may have purchased vehicles with the subject doors. Within 60 days of its filing of its Part 573 notification and report with NHTSA, in advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles and/or equipment. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Part 573 notification and report, and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;

b. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,

c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state.

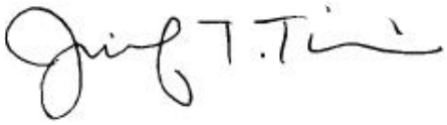
If your company does not agree that vehicles it manufactured with these doors are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), 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. Your company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ 13-006**. If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail or by e-mail to: rmd.odi@dot.gov **and** cynthia.glass@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

December 17, 2013

NVS-215cg
EQ 13-006
13E-039
13E-067

Via USPS Certified Mail
Attn: Materials Manager
Carson Trailers
14831 S Maple Avenue
Gardena, CA 90248

Subject: Fastec Door Locks

Dear Materials Manager:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain travel trailer door locks sold by Fastec Industrial Corporation (Fastec) that several vehicle manufacturers have decided contain a safety related defect. This investigation has been assigned the identification EQ 13-006.

The purpose of this letter is to make you aware of a potential safety defect in the vehicles and/or equipment your company may have manufactured, and to remind you of your responsibility under Federal Law.

In a letter dated July 11, 2013, Fastec notified the NHTSA that it decided a defect exists in certain door locks manufactured between January 2006 and April 2013 with a keyed paddle handle and deadbolt. It may be possible to remove the key from the lock while it is in a horizontal, 9 o'clock position, potentially jamming the deadbolt. If the key is removed while in the 9 o'clock position, the interior side of the door lock may be inoperable. A passenger inside the recreational vehicle may not be able to exit the vehicle without using the emergency exit, increasing the risk of injury. This matter was assigned recall number 13E-039.

We have now received similar reports from other vehicle and equipment manufacturers. Specifically, in a letter dated November 1, 2013, Lippert Components, Inc., (Lippert), notified the NHTSA of the same defect it determined exists in certain model doors. This recall was assigned recall number 13E-067. Lippert reported that it sold **232** of these doors to Carson Trailers, (your company), for assembly into recreational vehicles and/or equipment. Accordingly, we require the following information:

1. State whether your company has made or intends to make a decision that vehicles and/or equipment it manufactured with the subject doors contain a safety defect, and will notify its purchasers by conducting a safety recall.

2. If your company does not believe that the vehicles and/or equipment it manufactured with the subject doors contain a safety defect, provide all information, supporting documentation, and/or test results that support this opinion.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn that a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

Should you decide your vehicles contain a safety defect, your company that it is required to issue timely notification to owners who may have purchased vehicles with the subject doors. Within 60 days of its filing of its Part 573 notification and report with NHTSA, in advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles and/or equipment. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Part 573 notification and report, and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;

b. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,

c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state.

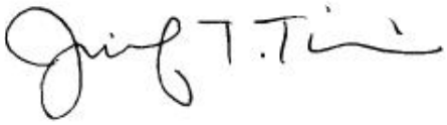
If your company does not agree that vehicles it manufactured with these doors are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), 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. Your company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ 13-006**. If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail or by e-mail to: rmd.odi@dot.gov **and** cynthia.glass@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

December 17, 2013

NVS-215cg
EQ 13-006
13E-039
13E-067

Via USPS Certified Mail
Attn: Materials Manager
Casita Enterprises Inc.
3030 SE Mckinney Street Bldg 2
Rice, TX 75155-9785

Subject: Fastec Door Locks

Dear Materials Manager:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain travel trailer door locks sold by Fastec Industrial Corporation (Fastec) that several vehicle manufacturers have decided contain a safety related defect. This investigation has been assigned the identification EQ 13-006.

The purpose of this letter is to make you aware of a potential safety defect in the vehicles and/or equipment your company may have manufactured, and to remind you of your responsibility under Federal Law.

In a letter dated July 11, 2013, Fastec notified the NHTSA that it decided a defect exists in certain door locks manufactured between January 2006 and April 2013 with a keyed paddle handle and deadbolt. It may be possible to remove the key from the lock while it is in a horizontal, 9 o'clock position, potentially jamming the deadbolt. If the key is removed while in the 9 o'clock position, the interior side of the door lock may be inoperable. A passenger inside the recreational vehicle may not be able to exit the vehicle without using the emergency exit, increasing the risk of injury. This matter was assigned recall number 13E-039.

We have now received similar reports from other vehicle and equipment manufacturers. Specifically, in a letter dated November 1, 2013, Lippert Components, Inc., (Lippert), notified the NHTSA of the same defect it determined exists in certain model doors. This recall was assigned recall number 13E-067. Lippert reported that it sold **210** of these doors to Casita Enterprises Inc., (your company), for assembly into recreational vehicles and/or equipment. Accordingly, we require the following information:

1. State whether your company has made or intends to make a decision that vehicles and/or equipment it manufactured with the subject doors contain a safety defect, and will notify its purchasers by conducting a safety recall.

2. If your company does not believe that the vehicles and/or equipment it manufactured with the subject doors contain a safety defect, provide all information, supporting documentation, and/or test results that support this opinion.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn that a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

Should you decide your vehicles contain a safety defect, your company that it is required to issue timely notification to owners who may have purchased vehicles with the subject doors. Within 60 days of its filing of its Part 573 notification and report with NHTSA, in advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles and/or equipment. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Part 573 notification and report, and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;

b. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,

c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state.

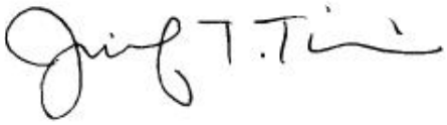
If your company does not agree that vehicles it manufactured with these doors are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), 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. Your company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ 13-006**. If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail or by e-mail to: rmd.odi@dot.gov **and** cynthia.glass@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

December 17, 2013

NVS-215cg
EQ 13-006
13E-039
13E-067

Via USPS Certified Mail
Attn: Materials Manager
Eclipse Recreational Vehicles
3016 Kansas Avenue Building 14
Riverside, CA 92507-3441

Subject: Fastec Door Locks

Dear Materials Manager:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain travel trailer door locks sold by Fastec Industrial Corporation (Fastec) that several vehicle manufacturers have decided contain a safety related defect. This investigation has been assigned the identification EQ 13-006.

The purpose of this letter is to make you aware of a potential safety defect in the vehicles and/or equipment your company may have manufactured, and to remind you of your responsibility under Federal Law.

In a letter dated July 11, 2013, Fastec notified the NHTSA that it decided a defect exists in certain door locks manufactured between January 2006 and April 2013 with a keyed paddle handle and deadbolt. It may be possible to remove the key from the lock while it is in a horizontal, 9 o'clock position, potentially jamming the deadbolt. If the key is removed while in the 9 o'clock position, the interior side of the door lock may be inoperable. A passenger inside the recreational vehicle may not be able to exit the vehicle without using the emergency exit, increasing the risk of injury. This matter was assigned recall number 13E-039.

We have now received similar reports from other vehicle and equipment manufacturers. Specifically, in a letter dated November 1, 2013, Lippert Components, Inc., (Lippert), notified the NHTSA of the same defect it determined exists in certain model doors. This recall was assigned recall number 13E-067. Lippert reported that it sold **5195** of these doors to Eclipse Recreational Vehicles, (your company), for assembly into recreational vehicles and/or equipment. Accordingly, we require the following information:

1. State whether your company has made or intends to make a decision that vehicles and/or equipment it manufactured with the subject doors contain a safety defect, and will notify its purchasers by conducting a safety recall.

2. If your company does not believe that the vehicles and/or equipment it manufactured with the subject doors contain a safety defect, provide all information, supporting documentation, and/or test results that support this opinion.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn that a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

Should you decide your vehicles contain a safety defect, your company that it is required to issue timely notification to owners who may have purchased vehicles with the subject doors. Within 60 days of its filing of its Part 573 notification and report with NHTSA, in advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles and/or equipment. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Part 573 notification and report, and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;

b. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,

c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state.

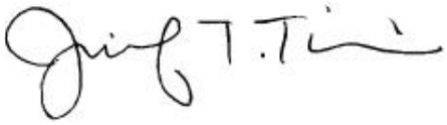
If your company does not agree that vehicles it manufactured with these doors are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), 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. Your company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ 13-006**. If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail or by e-mail to: rmd.odi@dot.gov **and** cynthia.glass@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement