Recreation by Design is a retail distributor of the subject locks, as explained on page 5. Recreation by Design is not conducting a recall. 11/04/13 cg

September 27, 2013

This report serves as Recreation By Design, LLC's notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a motor vehicle safety related issue exists in certain travel trailer locks sold by Fastec for installation in the doors of Recreational Vehicles.

I **Manufacturer, Designated Agent, and Other Chain of Distribution Information**

Filing Firm Name (RV Manufacturer): Recreation By Design, LLC.

Address:	57420 County Road 3
City:	Elkhart
State:	IN
Zip Code:	46517
Telephone:	574-294-2117
Fax:	574-294-4970

Entry Door Manufacturer: Lippert Components

Address:	88704 Expedite
City:	Chicago
State:	IL
Zip Code:	60695
Telephone	574-825-5744
Fax:	574-538-4362

Distributing Firm Name: Fastec Industrial Corp., a division of WESCO Distribution, Inc.

Address:	225 Wet Station Square Drive, Suite 700
City:	Pittsburgh
State:	PA
Zip Code:	15219
Telephone:	412-454-2554
Fax:	412-222-0160
Contact:	Bryan D. Kocher
Title:	Senior Counsel
Email:	bkocher@wesco.com
Telephone:	412-545-2554
Fax:	412-222-060

Manufacturer: Zhongsham Huafeng Locks Co., LTD

Address:	South of Yongning Industrial Avenue Xiaolan Town, Zhongshan, Guangdong People's Republic of China

II Type of equipment (as per Fastec)

The product consists of certain travel trailer locks with a keyed paddle handle and deadbolt installed in the doors of Recreation Vehicles. Zhongshan Huafeng Locks Co., Ltd. manufactures the locks, including the key cylinders used to operate the locks. Fastec designed, imports and distributes the locks as a private labeler using its FIC trademark. The locks are sold primarily to OEM RV door manufacturer and, in turn, as part of the RV door, to RV manufacturer.

Brand:	Fastec Industrial
Model Nos:	43610-00, 43610-06, 43610-09, 40610-00, 40610-06, 4061009, 44610-03, 44610-06, 44610-09
Key Codes:	HF-304, HF-307, HF-308, HF-309, HF-311, HF-313, HF-315, HF-316, HF-320, HF-322, HF-323, HF-328, HF-331, HF-335, HF-336, HF-339, HF342, HF-343, HF-347, and HF-349
Serial Nos:	N/A
Date Codes:	January 2006- April 2013

III Description of the Issue and Chronology of Events(as per Fastec)

Fastec does not believe that the locks that were the subject of this report have a defect that poses a substantial risk of injury to the public. It nonetheless has decided to conduct a recall to address a performance issue that could, ender extremely unusual circumstances, potentially pose a safety risk.

Specifically, some of the cylinders in some of the potentially affected locks identified above may not conform to the design specifications. As designed, keys cannot be removed from the deadbolt cylinder (the bottom cylinder) in the locked door when the key is in the horizontal, 9 o'clock position. Instead, the lock is designed so that a key can be removed from the deadbolt cylinder only when the key is in cylinder only when the key is in the vertical 12o'clock position or in the horizontal 3o'clock position. In those positions, removal of the key from the lock permits the door to be opened from inside the RV without a key by operating the red lever on the interior side of the lock to unlock the door. If a lock is affected, however, a key may be removed from the locked door with the key in the deadbolt cylinder is in the horizontal 9o'clock position, potentially jamming the deadbolt and potentially causing the red lever on the interior side of the lock to become inoperable.

Thus in the event that (1) a lock is affected; (2) the deadbolt in the door is locked from the outside with the key; (3) the key is removed from the deadbolt lock cylinder only when the key is in the 9 o'clock position;[1] (4) a person is inside the RV and (5) nobody outside the RV is available to unlock and open the main RV door, but he or she could still exit the RV from the emergency exit.

How and When Discovered (as per Fastec)

In December 2012, WESCO, Fastec, a RV door manufacturer (Phillips Products), and a RV manufacturer (Forest River, Inc.) settled a lawsuit that was brought by a consumer who alleged the she was injured when she exited her RV travel trailer from the emergency exit. The consumer alleged that she could not open the main RV door and that had been locked by her husband with his key from outside the RV. (Kelly v. Fastec Industrial Corp., et al., Case No. 6:11-cv-06256-TC (D. Or)).

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[1] If the consumer removes the key from the deadbolt lock cylinder while the key is in the vertical 12 o'clock position or In the horizontal 3 o'clock position, the deadbolt door lock functions properly as designed.

In the course of defending the lawsuit, the lock on the consumer's RV door was examined. It was manufactured in 2006. During 2006, some concern was expressed about the possibility that some locks manufactured by Huafeng might not conform to the design specifications, but Fastec believed those concerns had been fully addressed and finally resolved by Huafeng might not conform to the design specifications, but Fastec believed those concerns had been fully addressed and finally resolved by Huafeng. It ultimately was discovered, however, that the lock in the Kelly lawsuit was affected as described above with the key being able to be removed from the deadbolt cylinder in the 9o'clock position and the red lever on the interior side of the lock becoming inoperable under those conditions.

Huafeng and Fastec both investigated the issue further to determine whether any other deadbolt locks – regardless of the date of manufacture, the model number, or the key code – could have been similarly affected.

Specifically, on or about April 20, 2013, Huafeng reported to Fastec that Huafeng believed that some unknown subset of locks bearing eight separate key codes could potentially be affected. Huafeng subsequently reported on June 28, 2013 that further testing of the locksets indicated the possibility of removing the key in the 9 o'clock position in locks with 15 different key codes. Fastec also independently arranged to have an independent laboratory test samples of all the key codes used in all models of deadbolt RV locks inventory. It determined that locks with 15 different key codes (most of which were the same as those determined by Huafeng) could potentially be affected. In all, 20 separate key codes as identified above were determined to potentially be affected.

Fastec has no legal department of its own, but sought assistance from WESCO legal department in connection with this matter. WESCO is primarily in the business of selling wholesale electrical and industrial parts, not consumer products. Accordingly, outside counsel was retained to assess whether Fastec had any reporting obligations under the consumer product laws.

Outside counsel advised that Huafeng and WESCO both may have an obligation to report the issue. The same day that WESCO's General Counsel received this advice, a decision was made to submit a report, to conduct a recall, and to invite Huafeng to participate in the process. Huafeng declined to participate.

WESCO first filed an initial report with the Consumer Product Safety Commission ("CPSC") on June 12, 2013. The CPSC advised WESCO that the CPSC Office of General Counsel determined that the product falls under the jurisdiction of NHTSA, rather than CPSC.

Type of Hazard(as per Fastec)

If a lock is affected, the key may be removed from the deadbolt cylinder (the bottom cylinder) in the locked door when the key is in the horizontal 9o'clock position, potentially jamming the deadbolt and potentially causing the red lever on the interior side of the lock to become inoperable.

In the event that (1) a lock is affected; (2) the deadbolt in the door is locked from the outside with the key; (3) the key is removed from the deadbolt lock cylinder only when the key is in the 9 o'clock position;[2]; (4) a person is inside the RV and (5) nobody outside the RV is available to unlock and open the main RV door, but he or she could still exit the RV from the emergency exit.

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2 If the consumer removes the key from the deadbolt lock cylinder while the key is in the vertical 12 o'clock position or In the horizontal 3 o'clock position, the deadbolt door lock functions properly as designed.

Discussion of Known Injuries(as per Fastec)

Fastec has received only one report of a consumer injury. The plaintiff in Kelly allegedly fell when she could not exit the RV from the main door and, instead, used the RV's emergency exit. She sustained a herniated cervical disc and a fractured vertebra allegedly as a result of the fall.

There are no other lawsuits, and no other reports of injury of which Fastec is aware.

IV The Remedy Program and Its Schedule(as per Fastec)

Fastec and WESCO have or will unilaterally and voluntarily take the following steps:

Huafeng and Fastec identified the failure of some lock key codes to conform to design specifications, and Huafeng advised Fastec that Huafeng has removed non-conforming key codes from its inventory. Additionally, Huafeng has ceased production of cylinders with non-conforming key codes and indicated that the lock cylinders are being modified to improve the cylinder performance and prevent key removal in the 9o'clock position. All future production for Fastec will be limited to conforming key codes and reworked cylinders that will meet the design specifications.

Fastec additionally tested and initial lock from each of the unaffected 31 key code cylinders and then tested an additional six samples from each of six unaffected key codes. All samples passed theist easting with no keys being able to be removed in the 9 o'clock position. To test the samples, the deadbolt was locked by turning the key to the horizontal 9 o'clock position, and, with the key in that position, a minimum of 50pounds of force was applied in an effort to remove the key from the cylinder. Additionally, as of April 25, 2013, every deadbolt lock that Fastec ships to any customer from its current inventory has been being manually tested by employees to ensure that the key cannot be removed when the deadbolt is engaged and the key is in the horizontal, 9 o'clock position.

From: Glass, Cynthia (NHTSA)
To: Glass, Cynthia (NHTSA)
Subject: Equipment recall form
Date: Monday, November 04, 2013 2:55:03 PM

From: Monica Lamley [mailto:monica@rbdrv.com]
Sent: Wednesday, October 23, 2013 10:15 AM
To: Glass, Cynthia (NHTSA)
Subject: RE: Equipment recall form

We order the doors and the locks are already installed in them. We do not have any log of serial numbers or customers these may have went to.

Respectfully,

Monica Lamley
Assistant Controller
Recreation By Design
574-294-2117 phone
574-293-4970 fax
monica@rbdrv.com