

Michael C. Terrell  
317-713-3590  
mterrell@taftlaw.com

2014 NOV 20 PM 5:29

OFFICE OF  
CHIEF COUNSEL

One Indiana Square, Suite 3500 / Indianapolis, IN 46204-4609  
Tel: 317.713.3500 / Fax: 317.713.3699  
www.taftlaw.com

November 19, 2014

***Via Overnight Mail***

O. Kevin Vincent  
Chief Counsel  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
West Building, W41-326  
Washington, DC 20590

Re: Special Order Directed to Forest River, Inc., AQ14-002

Dear Mr. Vincent:

As you may recall, I am assisting Forest River, Inc. ("Forest River") in responding to the NHTSA Special Order dated October 2, 2014 ("Special Order"). Forest River continues to gather information requested in the Special Order and will continue with rolling productions of this information. However, Forest River would like clarification regarding some of NHTSA's requests.

First, NHTSA requested information regarding field reports. *See* Special Order, Request Nos. 5 and 6. In its response to the Special Order, Forest River explained that it does not believe it has any field reports. However, in light of the broad definition of "field report" and in an abundance of caution, Forest River produced emails that could potentially be classified as "field reports." To assist Forest River in redesigning and implementing its compliance program moving forward, it would be helpful to know whether NHTSA regards these emails as "field reports."

Second, Forest River continues to work on generating the quarterly reports sought in Request No. 5. As Forest River explained in its response to the Special Order, the computer program Forest River had used to comply with NHTSA reporting requirements was not designed properly. Forest River has been working diligently to design a program that will capture this information in the future. In addition, Forest River has been working to identify any previous customer complaints. Generally, any complaints regarding safety issues are captured in Forest River's report regarding warranty claims. Forest River's existing system also has a "VIN Notes" field for each VIN number used by Forest River. Employees manually type various notes in this field, including information possibly related to safety and non-safety issues. For example, this field may contain information regarding a customer's dissatisfaction with a vehicle's countertop color. Forest River has manufactured hundreds of thousands of vehicles in the last five years. Searching the VIN Notes for each of these vehicles would be extremely time-consuming and

O. Kevin Vincent  
November 19, 2014  
Page 2

costly. Given that this search may not result in identifying any additional responsive information not otherwise captured in the warranty claims report, Forest River intends to focus its on-going search for customer complaints on its warranty claims documents.

Thank you in advance for your assistance with this matter. Please contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "M. C. Terrell", written in a cursive style.

Michael C. Terrell

MCT/mlr

2270096.1