



Forest River, Inc.

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May 22, 2015

Mr. Bruce York
Chief, Medium and Heavy Duty Vehicles Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Washington, DC 20590

Re: Information Request RQ14-004 (Associated with Recall No. 13V-554)

Dear Mr. York,

Forest River, Inc. ("Forest River") submits the following amended response to the Information Request associated with RQ14-004. Forest River appreciates the agency's efforts to work with the company with regard to the agency's expectations. Forest River has revisited the data previously provided to the agency and has corrected inconsistencies. Forest River has confirmed that the population of vehicles subject to the recall is consistent with the change to the chassis and that, as discussed with the agency, no expansion is necessary.

On or about November 7, 2013 Forest River initiated Recall 13V-554 after determining that certain Model Year 2012 and 2013 Rockwood, Windjammer, Flagstaff and VLite trailers had the potential, under certain conditions, to experience contact between the tire and the bottom of the floor (the "Alleged Defect"). Forest River investigated the issue and determined that the Alleged Defect was attributable to the use of a new type of chassis (provided by Norco Industries) in 713 of the trailers, which resulted in an insufficient clearance between the vehicle floor and the tire that was not immediately detectable. Forest River's investigation determined that vehicles using Forest River's previous chassis (provided by Lippert Components) did not experience insufficient clearance, even under the worst conditions.

Forest River implemented a remedy for the Alleged Defect, consisting of the addition of a 2½-inch lift kit (the "Riser Kit") between the frame and the axle mounting brackets to provide adequate tire clearance between the tire and the floor for full jounce. Notices were sent to all dealers and customers who had purchased one of the 780 trailers that had been built with a Norco chassis. Forest River also has modified the design of the chassis used to add an

additional inch of axle POD height. As of March 31, 2015, Forest River had implemented the remedy for 474 of the 713 vehicles included in the Recall, for a 66.47% recall completion rate.

Request No. 1

State, by make, model and model year, the number of subject and peer vehicles Forest River has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Forest River, state the following:

- a. Vehicle identification number (VIN);
- b. Whether or not the vehicle was included in recall 13V-554;
- c. Make;
- d. Model;
- e. Model Year;
- f. Floor plan;
- g. Facility vehicle was manufactured at;
- h. Subject vehicle GVWR;
- i. Subject vehicle GAWR;
- j. Subject component supplier (axel and tire);
- k. Subject component part number and design version installed as original equipment;
- l. Date of vehicle manufacture;
- m. Date of subject component manufacture; and
- n. Date warranty coverage commenced.

Provide the table in Excel, or a compatible format, entitled "PRODUCTION DATA." A pre-formatted Data Collection File, which provides further details regarding this submission, will be emailed to you.

Response to Request No. 1:

An aggregate summary of the number of subject vehicles and peer vehicles, by make and model year, that Forest River has manufactured for sale or lease in the United States¹ is set forth in the following tables.

Subject Vehicles		
Make	Model Year	Number Manufactured
Rockwood	2012	3,721
Rockwood	2013	3,972
Flagstaff	2012	2,529
Flagstaff	2013	2,644

¹ The production data initially provided in response to this request in October 2014 included several vehicles that were subject to Canadian Recall 2014-003. Although the production data now provided excludes Canadian vehicles that were subject to the recall and that Forest River could identify, the data summaries may still include production vehicles sold in Canada.

Peer Vehicles		
Make	Model Year	Number Manufactured
Rockwood	2011	3,741
Rockwood	2014	4,715
Flagstaff	2011	2,577
Flagstaff	2014	2,791

Detailed information responsive to the remainder of the Request is set forth in the attached Excel file (Enclosure 1), entitled "RQ14-004 PRODUCTION DATA." The information and data provided in response to this Request was collected from Forest River's production records and production schedules. The information was gathered on or about October 31, 2014 and updated on or about May 21, 2015.

Request No. 2:

State the number of each of the following, received by Forest River, subject component supplier(s), or of which Forest River is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:

- a. Consumer complaints;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury or fatality;
- d. Property damage claims;
- e. Third-party arbitration proceedings where Forest River is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Forest River is or was a defendant or codefendant.

For subparts "a" through "f," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and Forest River's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "d" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

If Forest River does not maintain the requested information because owners are directed to deal directly with the subject component supplier(s), Forest River is required as the OEM to produce said information pursuant to 49 CFR Part 576.

Response to Request No. 2:

Forest River has received or is otherwise aware of 76 consumer complaints and/or field reports that relate to, or may relate to, the Alleged Defect.² This figure includes certain complaints and/or field reports relating to vehicles that were not part of Recall 13V-554 because they were built on the Lippert Components chassis. Forest River does not believe that these vehicles experienced the Alleged Defect, and if they did, Forest River does not believe any such experience is attributable to the root cause of the defect, as explained below in response to Request Nos. 9 and 16.

None of the complaints or field reports involved a fatality, but one involved a crash, injury and property damage.³ There are no third-party arbitration proceedings⁴ or lawsuits in which Forest River is or was a party that relate to, or may relate to, the Alleged Defect.

In responding to this Request, Forest River searched its Warranty Database to identify potentially responsive complaints or reports, using the following search terms, Repair Codes and Failure Codes:

- Repair Codes
 - 10-001820 – Dealer Flat Rate Repair Code for Recall 13V-554; Riser/Lift Kit
 - 20-020600 – Dealer Flat Rate Repair Code for Recall 13V-554; Fender Skirt
 - 10-002000 – Dealer Flat Rate Repair Code for Recall 13V-554; Wheel & Tire Combination

- Failure Codes
 - 065 – Blown

² Because Forest River used its Warranty Database (among other sources) to identify consumer complaints and field reports, there is significant overlap between this figure and the warranty claims identified in response to Request No. 5.

³ That complainant alleged that, on or about September 7, 2013, her husband hit a pot hole while driving a 2012 Chevrolet Silverado truck towing a Subject Vehicle, VIN [REDACTED]. Upon hitting the pot hole, he lost control of the vehicle and rolled both the trailer and the truck. Complainant alleged that she broke her wrist during the crash and suffers from related reflex sympathetic dystrophy (RSD), and also alleged property damage to the 2012 Chevrolet Silverado and personal effects. The police report relating to the incident does not mention that the vehicle hit a pot hole. Complainant did not contact Forest River until January 2014, after she had received the recall notice and after the Subject Vehicle at issue had been disposed of, and Forest River was therefore unable to perform an investigation as to the causal and contributing factors and unable to determine whether this incident is attributable to the Alleged Defect

⁴ In its January 15 response, Forest River identified two potential arbitrations, but one of those was proceedings was an insurance claim letter dated December 23, 2014 from State Farm Insurance (VIN 1 [REDACTED]) and the other was a December 18, 2014 complaint filed with the North Carolina Consumer Protection Bureau (VIN 1 [REDACTED])

- 002 – Rubbed
- 088 – Part of previous repair

Forest River undertook a manual review of the VIN notes for all vehicles identified in the Warranty Database with the aforementioned repair and failure codes. Forest River also reviewed its Risk Management file to identify potentially responsive complaints or reports. The information provided in response to this request was gathered on or about March 20, 2015 and May 21, 2015.

Request No. 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. Forest River's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner's name, mailing address, email address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model, model year, and floor plan;
- f. Vehicle's mileage at time of incident;
- g. Vehicle's Time in Service at time of incident;
- h. Incident date;
- i. Report or claim date;
- j. Whether a crash is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Excel, or a compatible format, entitled "REQUEST NUMBER TWO DATA." A pre-formatted Data Collection File, which provides further details regarding this submission, will be emailed to you.

Response to Request No. 3:

Detailed information responsive to this Request is set forth in the attached Excel file (Enclosure 3), entitled "REQUEST NUMBER 2 DATA." The source of the information provided in response to this Request and the date on which that information was collected is described in response to Request No. 2, above. As noted in response to Request No. 2 above, there is significant overlap between this data and the warranty data provided in response to Request No. 5.

Request No. 4:

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Forest River used for organizing the documents.

Response to Request No. 4:

Detailed information responsive to this Request is set forth in Enclosure 4, which consists of 94 pdf files and 1 Microsoft Word file titled by the VIN numbers shown in the "REQUEST NUMBER 2 DATA" file attached as Enclosure 3. The files included as Enclosure 4 contain all documents Forest River could locate through a reasonable search that relate to each item identified in response to Request 2.

The source of the information provided in response to this Request and the date on which that information was collected is described in response to Request No. 2, above.

Request No. 5:

State, by make, model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Forest River or the subject component supplier to date that relate to, or may relate to, the alleged defect in the subject and peer 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, for each such claim, state the following information:

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

Provide this information in Excel, or a compatible format, entitled "WARRANTY DATA." A pre-formatted Data Collection File, which provides further details regarding this submission, will be emailed to you.

If Forest River does not maintain the requested information because owners are directed to deal directly with the subject component supplier(s), Forest River is required as the OEM to produce said information pursuant to 49 CFR Part 576.

Response to Request No. 5:

As of March 20, 2015, Forest River has paid 380 warranty claims that relate to, or may relate to, the Alleged Defect in the subject vehicles or peer vehicles, excluding warranty claims for vehicles subject to Canadian recall 2014-003.⁵ This figure includes claims paid with regard to certain non-recall vehicles built on the Lippert Components chassis.

Forest River has not paid any extended warranty claims, claims for good will services, field, zone, or similar adjustments and reimbursements or warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign that relate to, or may relate to, the Alleged Defect in the subject vehicles or peer vehicles.

Detailed information responsive to the remainder of the Request is set forth in the attached Excel file (Enclosure 5), entitled “WARRANTY DATA.”⁶ The information provided in response to this Request was collected from Forest River’s Warranty Database on or about March 20, 2015. The “Concern Stated by Owner” column was updated manually after a review of the VIN notes for each vehicle to correct errors in the data on May 21, 2015.

Request No. 6:

Describe in detail the search criteria used by Forest River to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Forest River on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Forest River offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

⁵ As noted above, this figure overlaps with consumer complaints and field reports identified in response to Request 2.

⁶ The warranty data initially provided in response to this request in October 2014 included vehicles that were subject to Canadian recall 2014-003. It also included one vehicle, VIN 1[REDACTED] for which a riser kit was installed for reasons unrelated to the Alleged Defect. The warranty data has been revised to exclude these vehicles.

Response to Request No. 6:

Forest River identified the claims listed in response to Request No. 5 using the same search criteria described in response to Request No. 2, above.

The following labor operations, labor operation code descriptions, problem codes, and problem code descriptions are applicable to the Alleged Defect in the Subject Vehicles:

- Repair Codes
 - 10-001820 – Dealer Flat Rate Repair Code for Recall 13V-554; Riser/Lift Kit
 - 20-020600 – Dealer Flat Rate Repair Code for Recall 13V-554; Fender Skirt
 - 10-002000 – Dealer Flat Rate Repair Code for Recall 13V-554; Wheel & Tire Combination

- Failure Codes
 - 065 – Blown
 - 002 – Rubbed
 - 088 – Part of previous repair

Forest River's warranty is not specific to any year, make or model. Forest River warrants all authorized repairs made pursuant to the recall for one year after the repair is made.

Request No. 7:

State the current completion rate of recall 13-554. If any of the recalled vehicles have experienced the alleged defect provide the following information:

Separately, for each such claim, state the following information:

- a. Forest River's claim number;
- b. Vehicle owner's name, mailing address, email address, and telephone number;
- c. VIN;
- d. Date recall remedy was completed;
- e. Repair date of subsequent failure;
- f. Vehicle mileage at time of recall and subsequent repair;
- g. Vehicle's Time in Service at time of recall and subsequent repair;
- h. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- i. Labor operation number;
- j. Problem code;
- k. Replacement part number(s) and description(s);

- l. Concern stated by customer; and
- m. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Excel, or a compatible format, entitled "SUBSEQUENT FAILURE DATA." A pre-formatted Data Collection File, which provides further details regarding this submission, will be emailed to you.

If Forest River does not maintain the requested information because owners are directed to deal directly with the subject component supplier(s), Forest River is required as the OEM to produce said information pursuant to 49 CFR Part 576.

Response to Request No. 7:

The current completion rate of recall 13V-554, as of March 31, 2015, is 66.47%. Quarterly reporting is still ongoing for this recall. In its prior quarterly reports, Forest River utilized a recall population of 721 vehicles, which included several vehicles subject to Canadian recall 2014-003. As of March 31, 2015, 474 of the 713 total vehicles included in recall 13V-554 had been remedied.

In response to Request 2 above, Forest River noted that a customer filed a December 18, 2014 complaint with the North Carolina Consumer Protection Bureau that the riser kit affected vehicle handling, but not that the kit caused a recurrence of the alleged defect (VIN [REDACTED]). Forest River has not received any reports of subsequent failure for vehicles remedied pursuant to the recall.

Request No. 8:

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Forest River 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, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Forest River is planning to issue within the next 120 days.

Response to Request No. 8:

The only responsive documents are set forth in Enclosure 8, which consists of:

- Two Microsoft Word files entitled "Letter to Dealers" and "Letter to Canadian Dealers" (letters sent to dealers to inform them of the recall);

- A Microsoft Word file entitled “US Owner Letter” (a copy of which was provided to dealers); and
- Two pdf files entitled “Axle Assembly – Alko” and “Axle Assembly – Dexter” (installation sheets included with every recall kit sent out from Forest River’s parts department).

The Dealer Notification letter informs the dealership of the axle manufacturer and the correct part number to order, free of charge from Rockwood and Flagstaff Plant 10C. The separate axle assembly files contain the installation instructions used in the field with the dealerships in order to complete Recall 13V-554. Forest River has no plans to issue any further communications in the next 120 days. The information provided in response to this Request was gathered on or about October 31, 2014.

Request No. 9:

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, Forest River. 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.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Response to Request No. 9:

In April 2013, Forest River performed an analysis of tested axle data to determine the cause of the alleged defect. Specifically, Forest River measured and compared distances between the top of the axle bracket and the spindle center under various load conditions. This analysis revealed that vehicles manufactured using a new chassis, provided by Norco Industries, had significantly lower clearance than vehicles manufactured using Lippert Components chassis (the chassis previously used in the manufacture of the subject vehicles). The clearances were reviewed and

discussed with the axle manufacturer (Dexter Axle Group) and the tire distributor (Lions Head Tire and Wheel), along with Forest River's engineering department to determine the course of action and/or future actions. Forest River's assessment and analysis of the axle data are graphed out and explained in the pdf file (Enclosure 9) entitled "IR No. 9 Attachment 1."

Forest River concluded that, with respect to its normal frame and design, the vehicles remained within the target clearance even under the worst conditions if the trailer was loaded properly. This was not the case, however, with respect to vehicles using a new chassis from Norco Industries (Forest River began using the Norco chassis to explore options for future frame usage). The design of the Norco chassis is completely different than what the industry was used to, namely in that the rails were made from formed steel, as opposed to I-beam. This difference made it more difficult to identify proper clearance by sight, as can be done with a conventional I-beam application. At the time the Norco chassis were installed, the clearances looked normal to the eye, but actually were approximately 1/2-inch too small. Thus, the Alleged Defect was not detected by the production manager, engineering staff or employees in the chassis preparation station of the production line.

Forest River initiated Recall 13V-554 for all vehicles using the Norco chassis to remedy the smaller clearance. In April 2013, Forest River also implemented a revised post-ECN weight sheet that requires a wheel clearance check for the front and rear tires on both sides of the trailer to ensure that the tires do not interfere with the floor structure. The revised weight sheet is attached as a pdf file (Enclosure 9), entitled "Weight Sheet, Revised."

The information provided in response to this request was gathered on or about October 31, 2014, January 13, 2015 and March 20, 2015.

Request No. 10:

Provide a copy of all documents provided to Forest River from the subject component supplier(s) for the purpose of installation of the subject component in the subject and peer vehicles. These documents should include, but not be limited to; vehicle gross weight, required suspension travel, and ride height of the subject component.

Response to Request No. 10:

The only documents provided to Forest River from the subject component supplier for the purpose of installation of the subject component in the subject and peer vehicles are set forth in the attached pdf files (Enclosure 10), entitled "Axle Specification Sheet – Dexter Specs," "Axle Specification Sheet – Dexter Sales" and "Axle Installation Instructions – Dexter Axle." These documents include a brief synopsis and the detailed engineering specifications for the subject component, as well as detailed installation instructions.

The information provided in response to this request was gathered on or about October 31, 2014 and January 13, 2015.

Request No. 11:

Provide a copy of all work instructions related to the subject component used by Forest River's employees for the purpose subject and peer vehicle production. If instructions differ between manufacturing locations, clearly indicate which instructions are used by each facility.

Response to Request No. 11:

The work instructions related to the subject component used by Forest River's employees for the purpose subject and peer vehicle production are set forth in the pdf file included in Enclosure 10 entitled "Axle Installation Instructions – Dexter Axle," as well as the attached pdf file (Enclosure 11), entitled "FR axle assembly instructions." The information provided in response to this request was gathered on or about October 31, 2014 and January 13, 2015.

Request No. 12:

Describe the quality assurance systems in place at each manufacturing location to ensure that the subject component has been properly specified for the individual vehicle it was installed on, and is installed correctly. If available, provide production inspection records.

Response to Request No. 12:

Forest River's Engineering Group performs due diligence to ensure that component parts will not interfere with any part of the coach, that component parts are installed using tools provided by the component suppliers and in accordance with the installation instructions. Forest River's Quality Control Inspectors on the production line and in the production's final finish also check to ensure adequate clearance potential and ensure that the minimum distance is met for proper function of the shock loading of the coach, per the suppliers manufacturing instructions, axle specification sheets and design recommendations, and in accordance with Forest River's revised weight sheet discussed in response to Request No. 9, above. Lastly, the manufacturers of the chassis and axles conduct monthly audits of the installation of the components per the Forest River requirements of supplying the Forest River production plants with purchased parts.

The information provided in response to this request was gathered on or about March 20, 2015.

Request No. 13:

Describe all modifications or changes made by, or on behalf of, Forest River or at the discretion of the subject component supplier in the design, material composition, manufacture, quality

control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject and peer 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;
- b. The date or approximate date on which the modification or change was incorporated into subject component production;
- c. A detailed description of the modification or change;
- d. The reason(s) for the modification or change;
- e. The part number(s) (service and engineering) of the original component;
- f. The part number(s) (service and engineering) of the modified component;
- g. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- h. When the modified component was made available as a service component; and
- i. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Forest River is aware of which may be incorporated into vehicle production within the next 120 days.

Response to Request No. 13:

Forest River made the following modifications or changes that relate to the alleged defect:

- 1) Forest River immediately began development of an approved “Riser Kit” for both the Dexter axle and Al-Ko axle subject components to provide an additional inch of clearance between the axle and the frame. The part numbers of the original subject components are 3722505 (Dexter Axle) and 1441775 (Al-Ko Axle). The part numbers of the Riser Kits used to modify the subject components are 10-19080A (Dexter Axle Riser Kit) and 10-FT-22 (Al-Ko Axle Riser Kit). The Riser Kits were made available as a service component for vehicles subject to Recall 13V-554 in November 2013 and remain available as of the date of this letter. The original unmodified components have not been withdrawn from production or sale; rather, the Riser Kits are specifically designed for the original equipment and directly install to the vehicles’ axle mounting brackets. The Riser Kits are “backwards” compatible, and will fit any of the subject vehicles for sale or lease in the United States, Canada or elsewhere in the world.
- 2) In or around November 2013, Forest River also revised its chassis design for both chassis suppliers (Norco Industries and Lippert Components) to address the alleged defect. A one-inch increase in axle POD height was welded to the bottom of the main chassis rail on both the road and curb side to accommodate proper tire clearance against the main

floor structure, effectively incorporating the “Riser Kit” into the design of the chassis. The part numbers of both the original and modified chassis are derived by floorplan (i.e., each has a distinct part number according to the floorplan). Unmodified chassis were withdrawn from production in November 2013, and all unmodified Norco chassis (the chassis susceptible to the alleged defect) are subject to Recall 13V-554. The modified chassis are not available as a service component and cannot be interchanged with earlier production components.

Forest River is not aware of any modification or change that may be incorporated into vehicle production in the next 120 days. The information provided in response to this request was gathered on or about October 31, 2014, January 13, 2015 and March 20, 2015.

Request No. 14:

If the subject component is available as a service replacement, provide a count of parts sales by month. If the individual components of the subject component can be purchased separately, provide a count of parts sales by month for each item. Separate parts sales by supply and revision if applicable.

Response to Request No. 14:

The subject component is not available as a service replacement. As discussed in response to Request No. 13, Forest River has provided a service kit to remedy the alleged defect. Forest River does not charge for any part(s) required to complete a technical service bulletin or recall, and all parts provided in connection with Recall 13V-554 are supplied free of charge, including labor cost for installation of the Riser Kits.

Request No. 15:

If Forest River has offered the recall remedy as a service kit for consumer purchase, provide a count of parts sales to consumers by month.

Response to Request No. 15:

Forest River offered a Riser Kit as a recall remedy. Forest River does not charge for any part(s) required to complete a technical service bulletin or recall, and all parts provided in connection with Recall 13V-554 are supplied free of charge, including labor cost for installation of the “Riser Kits,” with the exception of five Riser Kits that were purchased by customers. A count of these sales by month is set forth below:

August 2013	--	1 (VIN 1 [REDACTED], Order No. [REDACTED])
October 2013	--	1 (VIN 1 [REDACTED], Order No. 2 [REDACTED])

September 2014	--	1 (VIN 1 [REDACTED], Order No. [REDACTED])
May 2014	--	1 (VIN 1 [REDACTED], Order No. [REDACTED])
November 2014	--	1 (VIN 1 [REDACTED] Order No. [REDACTED])

Forest River subsequently reimbursed three of the five customers who purchased Riser Kits for the cost of those Riser Kits (VIN 1 [REDACTED], VIN 1 [REDACTED] and VIN 1 [REDACTED]).

The information provided in response to this request was gathered on or about January 13, 2015.

Request No. 16:

Provide an explanation of how Forest River determined the scope of recall 13V-554 and why the vehicles identified in the attached VOQs were not included.

Response to Request No. 16:

Forest River determined the scope of the recall by identifying all units that were built using chassis supplied by Norco Industries which, as discussed in detail in response to Request No. 9 above and Request No. 17 below, measured ½” shorter than chassis provided by Lippert Components.

With respect to the VOQs attached to the Information Request:

- 1) ODI No. 10538519 – VIN No. 1 [REDACTED] was included in the recall; however, the VOQ appears to have been received by NHTSA from the customer prior to the initiation of the recall. The vehicle was repaired on December 11, 2013.
- 2) ODI No. 10598344 – VIN No. 1 [REDACTED] was not included in the recall because it did not use a Norco chassis and is not one of the models affected by the alleged defect. Forest River does not have any record of receiving any complaints regarding tire and wheel contact to the floor structure for this vehicle.
- 3) ODI No. 10598458 – VIN No. [REDACTED] was not included in the recall because it did not use a Norco chassis and is not one of the models affected by the alleged defect. The customer contacted Forest River after he became aware of the recall and claimed that he was experiencing the alleged defect. The customer acknowledged that his vehicle had one inch of clearance inside each wheel well, but insisted on having a Riser Kit installed. Forest River provided the customer with a Riser Kit free of charge.

Forest River has identified certain other consumer complaints relating to clearance between the chassis and tires for vehicles that were not built using Norco chassis and thus were not included

in the recall. Forest River has investigated these complaints and does not believe that they are attributable to insufficient clearance; rather, they could have resulted from overloading the unit, over-inflation of the tires, steep graded driveway, and/or a customer's perception of inadequate clearance after learning of the recall. Forest River has nonetheless included these complaints and related documentation in its responses to Requests 2-4, and associated warranty claims in its response to Request 5.

The information provided in response to this request was gathered on or about January 13, 2015 and March 20, 2015.

Request No. 17:

Furnish Forest River's 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 that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The reports included with this inquiry.

Response to Request No. 17:

Forest River's investigation has determined that the alleged defect was caused by inadequate clearance between the floor and tire in vehicles using chassis supplied by a new chassis supplier, Norco Industries. Specifically, Forest River determined that vehicles manufactured with chassis supplied by Norco Industries had significantly lower clearance than those manufactured with chassis supplied by Lippert Components (Forest River's longtime supplier). Forest River concluded that, with respect to its normal frame and design, the vehicles remained within the target clearance even under the worst conditions if the trailer was loaded properly. This was not the case, however, with respect to vehicles using a new chassis from Norco Industries (Forest River began using the Norco chassis to explore options for future frame usage). The design of the Norco chassis is completely different than what the industry was used to, namely in that the rails were made from formed steel, as opposed to I-beam. This difference made it more difficult to identify proper clearance by sight, as can be done with a conventional I-beam application. At the time the Norco chassis were installed, the clearances looked normal to the eye, but actually were approximately ½-inch too small. Thus, the Alleged Defect was not detected by the production manager, engineering staff or employees in the chassis preparation station of the production line.

In severe cases, the inadequate clearance could lead to tires rubbing in the wheel well of the vehicle, and could pose a risk of structural damage, damage to the fender skirting or tire blowout while driving, particularly if the vehicle hits a pot hole in the road or any other obstructions that may cause a full jounce about the axle arm. The primary safety risk would be a loss of vehicle control upon tire failure due to interference from the floor structure.

Warnings to the vehicle operator or other persons both inside and outside the vehicle that the alleged defect was occurring could include unusual tire wear or scuff marking on the tread of the tires, rub marks on the wheel well of the vehicle, fender skirt damage or a rubber smell from the tire rubbing against the floor structure.

Forest River's assessment of the reports included with the Information Request is set forth in response to Request No. 16, above. The information provided in response to this request was gathered on or about January 13, 2015 and March 20, 2015.

Objections:

While Forest River wishes to cooperate with NHTSA and has provided the requested information, this amended response and prior responses contain a few objections to the scope of the information request that are necessary and commonly made when responding to such requests. First, Forest River objects to the definition of "document" in the Information Request on the grounds that it is unreasonably broad, vague, and ambiguous, and to each individual Request that incorporates this term as defined, particularly those requests that seek "all documents" relating to various issues, on the grounds that such requests are unreasonably broad and exceed the scope of records that might reasonably be expected to bear relevant information. Second, Forest River further objects to the extent the Information Request seeks information or documents that are beyond Forest River's possession, custody or control. Forest River's response to the Information Request was based on searches of locations where documents determined to be responsive to the information request would normally be found and in consultation with current personnel knowledgeable about the information requested.

Conclusion:

Forest River thanks NHTSA for this opportunity to provide additional information in response to the information request. Forest River has a deep commitment to the safety of our customers and looks forward to working with NHTSA to answer any additional questions and address any concerns.

Respectfully submitted,

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