

OFFICE OF THE CHIEF COUNSEL (NCC-111)  
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION  
WEST BUILDING  
RM W41-326  
1200 NEW JERSEY AVENUE, SE  
WASHINGTON, DC 20590

ATTENTION: MS. SARAH SORG  
SENIOR TRIAL ATTORNEY, LITIGATION AND ENFORCEMENT NATIONAL HIGHWAY  
TRAFFIC SAFETY ADMINISTRATION U.S. DEPARTMENT OF TRANSPORTATION

**RE: AQ 15-001, Triumph Motorcycles (America) Ltd.**

Dear Ms. Sorg:

Please see Triumph Motorcycle (America) Ltd.'s initial response to your April 29, 2015 special order. We will supplement this response with a more-complete response by June 9, 2015.

**RESPONSES TO REQUESTS**

1. **Triumph's chronology contained in the Part 573 Report for NHTSA Recall No. 14V-548 states, "30 April 2013 Triumph central warranty notified by subsidiary personnel of potential defect."<sup>1</sup> Answer the following requests related to this part of the chronology:**

**a. Describe where "Triumph central warranty" fits in the organizational structure of Triumph.**

***Response to Request No. 1a:***

Triumph central warranty is Triumph's factory-based-warranty administration and approval team. Triumph central warranty oversees the warranty process for all subsidiaries of Triumph Motorcycles, Ltd. world-wide. The source of this information was from Triumph Motorcycles, Ltd. Central Warranty Team. The last date this information was gathered was on May 15, 2015.

---

<sup>1</sup> Available at <http://www-odi.nhtsa.dot.gov/acms/cs/jaxrs/download/doc/UCM464419/RCAK-14V548-6482.pdf>.

- b. Describe the overall process used by Triumph to make a defect determination, and specify what role "Triumph central warranty" has in that process.**

***Response to Request No. 1b:***

The overall process used by Triumph to make a defect determination is as follows: Defects are identified by warranty claims or in-service feedback, which are brought to the attention of the Triumph Central Warranty Team ("CWT"). Triumph's CWT will review the information to determine if the warranty claim needs further investigation. If further investigation is required, Triumph CWT will obtain an engineering opinion from Triumph's Quality Department and Design Department. If, on the other hand, defects are discovered as part of the manufacturing process, these defects will be brought to Triumph's CWT by either Triumph's Quality or Design Departments.

Should any defect be determined to be a safety defect, Triumph's CWT will have a meeting with Triumph's Recall Group to discuss what future actions need to be made. The source of this information was from Triumph Motorcycles, Ltd. Central Warranty Team. The last date this information was gathered was on May 15, 2015.

- c. Identify the "subsidiary personnel" referenced in the chronology.**

***Response to Request No. 1c:***

We are unable to respond to this question at this time. We are still gathering the necessary documents to provide you with a complete response. We estimate a more complete response to be submitted by and including Tuesday, June 9, 2015.

- d. Provide a summary of the notification to "Triumph central warranty."**

***Response to Request No. 1d:***

We are unable to respond to this question at this time. We are still gathering the necessary documents to provide you with a complete response. We estimate a more complete response to be submitted by and including Tuesday, June 9, 2015.

- e. Produce a copy of all documents related to the notification to central warranty.**

*Response to Request No. 1e:*

We are unable to respond to this question at this time. We are still gathering the necessary documents to provide you with a complete response. We estimate a more complete response to be submitted by and including Tuesday, June 9, 2015.

- f. Produce a copy of all documents referring or relating to the "potential defect".**

*Response to Request No. 1f:*

We are unable to respond to this question at this time. We are still gathering the necessary documents to provide you with a complete response. We estimate a more complete response to be submitted by and including Tuesday, June 9, 2015.

**2. Triumph's chronology contained in the Part 573 Report for NHTSA Recall No. 14V-548 states, "4 June 2013 Triumph central warranty notifies Triumph North America". Answer the following questions relating to this part of the chronology:**

- a. Describe the contents of the notification from "Triumph central warranty" to Triumph North America.**
- b. Identify the individuals at Triumph North America who were notified by "Triumph central warranty."**

***Response to Request No. 2a-b:***

On June 5, 2013, Triumph CWT emailed Triumph North America with a copy of the completed Part 573 Report for NHTSA. Triumph central warranty notified Scott H. Callander, After-Sales Manager of Triumph North America. Please see attached email and copy of Part 572 Report for NHTSA. The source of this information was from Triumph Motorcycles, Ltd. Central Warranty Team. The last date this information was gathered was on May 15, 2015.

***Response to Request No. 2b:***

- c. Produce a copy of all documents referring or relating to the notification from "Triumph central warranty."**

***Response to Request No. 2c:***

Please see documents referenced in Response to Request No. 2a-b above.

- d. Provide a detailed chronology of the steps taken by Triumph North America after receiving the June 4, 2013 notification that related to Triumph's initiation of a recall.**

***Response to Request No. 2d:***

We are unable to respond to this question at this time. We are still gathering the necessary documents to provide you with a complete response. We estimate a more complete response to be submitted by and including Tuesday, June 9, 2015.

- 3. Provide a detailed summary of circumstances relating to the decision to recall the subject vehicles for the defect. Your response must include the date that the safety-related defect decision was made, who made that decision, the date any recall notification was filed with the United Kingdom's Department for Transport or other**

**governmental authority in the United Kingdom, and the date that Triumph first filed a Part 573 Report with NHTSA relating to the defect in the subject vehicles.**

***Response to Request No. 3:***

We are unable to respond to this question at this time. We are still gathering the necessary documents to provide you with a complete response. We estimate a more complete response to be submitted by and including Tuesday, June 9, 2015.

**4. Provide all documents referring or relating to Triumph's decision to recall the subject vehicles for the defect.**

***Response to Request No. 4:***

We are unable to respond to this question at this time. We are still gathering the necessary documents to provide you with a complete response. We estimate a more complete response to be submitted by and including Tuesday, June 9, 2015.

**5. If you are contending that Triumph filed a Part 573 Report with NHTSA relating to the defect in the subject vehicles prior to September 8, 2014:**

**a. Produce a copy of all documents to support your contention, and**

***Response to Request No. 5a:***

Triumph filed a Part 573 Report with NHTSA on June 4, 2013 relating to the defect in the subject vehicles. Please see documents responsive to Request 2c above. In addition, please see a June 4, 2013 email from NHTSA to Charles Smart, Head of Triumph's Central Warranty Team, confirming that Triumph's recall (SB 501, NHTSA Campaign ID Number 13V215) that "throttle cables may hinder steering" had been lodged by NHTSA. The source of this information was from Triumph Motorcycles,

Ltd. Central Warranty Team. The last date this information was gathered was on May 15, 2015.

- b. Produce a copy of all notices, bulletins, dealer notifications, and other communications that relate to the recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s) (sent to more than one manufacturer, distributor, dealer, or purchaser/owner) provided to NHTSA's Recall Management Division, along with any documentation of NHTSA's receipt of such communications.**

*Response to Request No. 5b:*

Please see the attached copy of final owner notification letter. We are not able to fully respond to this request at this time. We are in the process of gathering the necessary information needed to respond to this question. We estimate a more complete response will be submitted to you by and including, Tuesday, June 9, 2015. The source of this information was from Triumph Motorcycles (America), Ltd. The last date this information was gathered was on May 22, 2015.

- 6. For a period of five years prior to the date of this Special Order, provide a copy of all notices, bulletins, and other communications as specified by 49 C.F.R. § 579.5 that Triumph has not previously provided to NHTSA. To the extent not indicated on the document, provide the date that each notice, bulletin, or other communication responsive to this request was issued.**

***Response to Request No. 6:***

To the best of our knowledge, for a period of five years prior to the date of this Special Order, Triumph has provided all notices, bulletins and other communications as specified by 49 C.F.R. § 579.5 to NHTSA. We are in the process of reviewing and gathering the necessary information to fully respond to this question, if needed. We estimate a more complete response will be submitted to you by and including, Tuesday, June 9, 2015, if necessary. The source of this information was from Triumph Motorcycles, Ltd. Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**7. For each communication identified in response to Request No. 6 that has not previously been provided to NHTSA, provide an explanation for Triumph's failure to report to NHTSA.**

***Response to Request No. 7:***

Not applicable. To the best of our knowledge, for a period of five years prior to the date of this Special Order, Triumph has provided all notices, bulletins and other communications as specified by 49 C.F.R. § 579.5 to NHTSA. We are in the process of reviewing and gathering the necessary information to fully respond to this question, if needed. We estimate a more complete response will be submitted to you by and including, Tuesday, June 9, 2015, if necessary. The source of this information was from Triumph Motorcycles, Ltd. Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**8. Describe in detail Triumph's process for collecting notices, bulletins, and other communications described in 49 C.F.R. § 579.5 that Triumph sent to more than one manufacturer, distributor, dealer, lessor, lessee, owner, or purchaser, in the United States and describe the process for providing those communications to NHTSA pursuant to 49 C.F.R. § 579.5. State whether Triumph has made any changes to that process during the prior five years and, if yes, describe the changes.**

*Response to Request No. 8:*

Triumph's CWT contributes to the drafting of technical notices, bulletins and other technical communications and materials. Triumph's CWT is responsible for circulating technical notices, bulletins and other communications and materials to all Triumph subsidiary offices and overseas distributor offices. The Triumph subsidiary or distributor office is responsible for making any local changes to the supplied materials before circulating to their respective dealer networks.

Materials are circulated to subsidiary and distributor offices via a dedicated Triumph web portal and email. Materials are circulated by Triumph subsidiaries and distributors to dealers via a local Triumph web portal. Triumph has not made any changes to this process during the prior five years. The source of this information was from Triumph Motorcycles, Ltd.'s Central Warranty Team. The last date this information was gathered was on May 22, 2015.

**9. Describe in detail any changes Triumph anticipates making to its process for collecting notices, bulletins, and other communications described in 49 C.F.R. § 579.5 that Triumph sent to more than one manufacturer, distributor, dealer, lessor, lessee, owner, or purchaser, in the United States and providing those communications to NHTSA**

**pursuant to 49 C.F.R. § 579.5. Your response should include an anticipated timeline for implementing any such changes.**

***Response to Request No. 9:***

Triumph does not anticipate making any changes to its process for collecting notices, bulletins and other communications described in 49 C.F.R. § 579.5 that Triumph sends to more than one manufacturer, distributor, dealer, lessor, lessee, owner, or purchaser, in the United States and providing those communications to NHTSA pursuant to 49 C.F.R. § 579.5. The source of this information was from Triumph Motorcycles, Ltd.'s Central Warranty Team. The last date this information was gathered was on May 22, 2015.

**10. For a period of five years prior to the date of this Special Order, provide a list of all corporate entities, including any parent corporation, subsidiary, or affiliate and any subsidiary or affiliate of a parent corporation, for which Triumph Motorcycles America Ltd. has submitted information pursuant to 49 C.F.R. §§ 579.23 or 579.27. For each entity listed in your response provide:**

***Response to Request No. 10:***

For the period of five years prior to the date of this Special Order, Triumph Motorcycles (Motorcycles) Ltd. has submitted information pursuant to 49 C.F.R. §§ 579.23 or 579.27 to Triumph's Central Warranty Team, if the event is alleged to be a result of an alleged defect in the subject motorcycle.

- a. The name, title, business address, business email, and business telephone number of the person responsible for meeting that entity's reporting obligations pursuant to 49 C.F.R. Part 579;

**Response to Request No. 10a:** Charles Smart, Head of Warranty, Central Warranty Team,  
Triumph Motorcycles, Ltd., Normandy Way, Hinckley, Leicestershire LE10 3BZ,  
[Charles.Smart@triumph.co.uk](mailto:Charles.Smart@triumph.co.uk); +44(0) 1455-251700.

- b. The name, title, business address, business email, and business telephone number of the person responsible for collecting and administering death and injury claims for that entity;

**Response to Request No. 10b:** See response to 10a above.

- c. The name, title, business address, business email, and business telephone number of the person responsible for collecting and administering property damage claims for that entity;

**Response to Request No. 10c:** See response to 10a above.

- d. The name, title, business address, business email, and business telephone number of the person responsible for collecting and compiling consumer complaints for that entity;

**Response to Request No. 10d:** See response to 10a above.

- e. The name, title, business address, business email, and business telephone number of the person responsible for collecting and administering warranty claims for that entity; and

**Response to Request No. 10e:** See response to 10a above.

- f. The name, title, business address, business email, and business telephone number of the person responsible for collecting and compiling field reports for that entity.

**Response to Request No. 10f:**

See response to 10a above.

**11. For each quarterly reporting period, as established in 49 C.F.R. Part 579, from April 1, 2005 through the present date, provide the production information specified by 49 C.F.R. § 579.23(a).**

***Response to Request No. 11:***

We are unable to respond to this request at this time. We are gathering the necessary documents to respond to this question. We estimate that we will be able to provide a more complete response by and including Tuesday June 9, 2015. The source of this information was from Triumph Motorcycles, Ltd. Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**12. For each quarterly reporting period, as established in 49 C.F.R. Part 579, from April 1, 2005 through the present date, provide a report on each incident involving one or more deaths or injuries as specified by 49 C.F.R. § 579.23(b) that has not previously been provided to NHTSA. For each incident within the scope of your response provide:**

- a. A complete copy of the initial claim or notice document(s) that notified Triumph of the incident, excluding: (a) medical documents and bills, except those showing the cause of death or injury; (b) property damage invoices or estimates; and (c) documents related to damages;**
- b. A copy of any police accident report concerning the incident;**
- c. Triumph's assessment of the circumstances that led to the incident including Triumph's analysis of the claim and/or notice regarding allegations of a defect; and,**
- d. For any lawsuit related to the incident, provide a copy of the most recent complaint and describe the current status of the lawsuit. If the lawsuit has been resolved as to Triumph, your response should indicate the date of resolution and describe the resolution.**

***Response to Request No.12a-d:***

Not applicable. To the best of our knowledge, for each quarterly reporting period, as established in 49 C.F.R. Part 579 Triumph has provided a report on each incident involving one or more deaths or injuries as specified by 49 C.F.R. § 579.23(b) to NHTSA. We are in the process of reviewing and gathering the necessary information to fully respond to this

question, if needed. We estimate a more complete response will be submitted to you by and including, Tuesday, June 9, 2015, if necessary. The source of this information was from Triumph Motorcycles, Ltd. Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**13. Describe in detail Triumph's process for determining whether any incident involving one or more deaths or injuries needed to be reported to NHTSA pursuant to 49 C.F.R. § 579.23. Your response should include an explanation of any changes to Triumph's process, including those made as a result of any amendments to 49 C.F.R. Part 579 or any allegation or assessment that Triumph failed to fully comply with 49 C.F.R. Part 579. Your response should also include an explanation of why Triumph failed to report to NHTSA pursuant to 49 C.F.R. Part 579 any incidents included within the scope of your response to Request No. 12.**

***Response to Request No. 13:***

Triumph's process for determining whether any incident involving one or more deaths or injuries needed to be reported to NHTSA pursuant to 49 C.F.R. § 579.23 is as follows: Upon being notified of a death or injury, Triumph Motorcycles (America) Ltd. will try to obtain better details of the reported event. If the event is claimed to be as a result of a defect on the motorcycle, details are reported to Triumph's CWT. If the event is a standard-road-traffic incident, no further action is taken. In the event of a product allegation, Triumph Motorcycles (America) Ltd., and Triumph's CWT will work together to further investigate the allegation. This may take the form of interviews of the owner, rider of the motorcycle, any passengers, and any third parties, as well as any dealer employees who have come into contact with the rider of the motorcycle. An inspection of the motorcycle and of the reported accident site may

also be conducted, subject to further information obtained, and the nature of the alleged incident. If required, an independent specialist will be retained to conduct additional testing, such as metallurgical testing or accident-reconstruction experts. Triumph has reported all known death and injury incidents to NHTSA pursuant to 49 C.F.R. Part 579.

The source of this information was from Triumph Motorcycles, Ltd.'s Central Warranty Team. The last date this information was gathered was on May 22, 2015.

**14. For each quarterly reporting period, as established in 49 C.F.R. Part 579, from April 1, 2005 through the present date, provide separate reports on the numbers of those property damage claims, consumer complaints, warranty claims, and field reports which involve the systems and components that are specified in codes 01 through 20 in paragraph (b)(2) of 49 C.F.R. § 579.23 or a fire (code 23) not previously provided to NHTSA.**

***Response to Request No. 14:***

Not applicable. To the best of our knowledge, from April 1, 2005 through the present date, Triumph has provided all reports pursuant to paragraph (b)(2) of 49 C.F.R. § 579.23 to NHTSA. We are in the process of reviewing and gathering the necessary information to fully respond to this question, if needed. We estimate a more complete response will be submitted to you by and including, Tuesday, June 9, 2015, if necessary. The source of this information was from Triumph Motorcycles, Ltd.'s Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**15. Describe in detail Triumph's process for determining whether property damage claims, consumer complaints, warranty claims, and field reports involving systems and components specified in 49 C.F.R. § 579.23 need to be reported to NHTSA**

**pursuant to 49 C.F.R. Part 579. State whether Triumph has made any changes to that process during the prior five years and, if yes, describe the changes.**

***Response to Request No. 15:***

We are unable to provide a response to this question at this time. We are analyzing necessary information and documents in order to provide you with a response. We estimate that we will be able to provide you with a more complete response by and including Tuesday, June 9, 2015. The source of this information was from Triumph Motorcycles, Ltd. Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**16. For each quarterly reporting period, as established in 49 C.F.R. Part 579, from April 1, 2005 through the present date, provide copies of all field reports required under 49 C.F.R. § 579.23(d) not previously provided to NHTSA.**

***Response to Request No. 16:***

Not applicable. To the best of our knowledge, for the period of April 1, 2005 through the present date, Triumph has provided copies of all field reports required under 49 C.F.R. § 579.23(d). We are in the process of reviewing and gathering the necessary information to fully respond to this question, if needed. We estimate a more complete response will be submitted to you by and including, Tuesday, June 9, 2015, if necessary. The source of this information was from Triumph Motorcycles, Ltd.'s Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**17. Describe in detail Triumph's process for determining whether field reports specified in 49 C.F.R. § 579.23 need to be reported to NHTSA pursuant to 49**

**C.F.R. Part 579. State whether Triumph has made any changes to that process during the prior five years and, if yes, describe the changes.**

***Response to Request No. 17:***

We are unable to provide a response to this question at this time. We are reviewing all necessary information in order to provide you with an accurate response. We estimate that we will be able to provide you with a more complete response by and including Tuesday, June 9, 2015. The source of this information was from Triumph Motorcycles, Ltd. Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**18. To the extent that Triumph failed to report to NHTSA pursuant to 49 CFR Part 579 reports required under 49 C.F.R. § 579.23(c) or 49 C.F.R. § 579.23(d), provide an explanation for Triumph's failure to report such information.**

***Response to Request No. 18:***

Not applicable. To the best of our knowledge, Triumph has reported to NHTSA pursuant to 49 CFR Part 579 reports required under 49 C.F.R. § 579.23(c) or 49 C.F.R. § 579.23(d). We are in the process of reviewing and gathering the necessary information to fully respond to this question, if needed. We estimate a more complete response will be submitted to you by and including, Tuesday, June 9, 2015, if necessary. The source of this information was from Triumph Motorcycles, Ltd.'s Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**19. If you believe Triumph is not covered by the reporting requirements in 49 C.F.R. § 579.23, answer the following questions:**

- a. Provide a detailed summary explaining the basis for your belief that Triumph is not covered by the reporting requirements of 49 C.F.R. § 579.23.
- b. For each quarterly reporting period, as established in 49 C.F.R. Part 579, from April 1, 2005 through the present date, provide a report on each incident involving one or more deaths as specified by 49 C.F.R. § 579.27, not previously provided to NHTSA.
- c. Describe in detail Triumph's process for determining whether any incident involving one or more deaths or injuries needed to be reported to NHTSA pursuant to 49 C.F.R. § 579.27. Your response should include an explanation of any changes to Triumph's process, including those made as a result of any amendments to 49 C.F.R. Part 579 or any allegation or assessment that Triumph failed to fully comply with 49 C.F.R. Part 579. Your response should also include an explanation of why Triumph failed to report to NHTSA pursuant to 49 C.F.R. Part 579 any incidents included within the scope of your response above.

*Response to Request No. 19a-c:*

Triumph agrees that it is covered by the reporting requirements in 49 C.F.R. § 579.23.

20. For a period of five years prior to the date of this Special Order, provide a list of all corporate entities, including any parent corporation, subsidiary, or affiliate and any subsidiary or affiliate of a parent corporation, for which Triumph Motorcycles America Ltd. has submitted a defect or noncompliance information report to pursuant 49 C.F.R. § 573.6.

***Response to Request No. 20:***

We are unable to answer this question at this time. We are reviewing all necessary information and documentation in order to provide you with a more complete response. We estimate that we will be able to provide you with a more complete response by and including, Tuesday, June 9, 2015. The source of this information was from Triumph Motorcycles, Ltd.'s Central Warranty Team & Triumph Motorcycles (America) Ltd. The last date this information was gathered was on May 22, 2015.

**21. On or about September 29, 2014, NHTSA informed Triumph that according to our records, Triumph's second calendar quarterly report for Recall No. 13V-608 was due on or before July 30, 2014, and that we have not received this report.**

**Answer the following:**

- a. State the date which you first provided this quarterly report to NHTSA.**
- b. If you contend that this date was on or before July 30, 2014, produce all documents to support your contention.**

***Response to Request No. 21a-b:***

Triumph's second calendar quarterly report for Recall No. 13V-608 was submitted to NHTSA on September 29, 2014. Please see attached documents. The source of this information was received from Scott Callander, After-Sales Manager, Triumph North America. This information was last gathered on May 22, 2015.

**22. On or about February 25, 2015, NHTSA informed Triumph that according to our records, Triumph's fourth calendar quarterly report for Recall No. 13V-608 was due on or before January 30, 2015, and that we have not received this report. Answer the following:**

- a. **State the date that you first provided this quarterly report to NHTSA.**
- b. **If you contend that the date was before January 30, 2015, produce all documents to support your contention.**

***Response to Request No. 22a-b:***

Triumph's fourth calendar quarterly report for Recall No. 13V-608 was submitted on February 25, 2015. Please see attached document. The source of this information was received from Scott Callander, After-Sales Manager, Triumph North America. This information was last gathered on May 22, 2015.

23. **With respect to other quarterly reports required for Recall No. 13V-608, state the date that you first provided to NHTSA the first calendar quarterly report for 2014.**

***Response to Request No. 23:***

With respect to other quarterly reports required for Recall No. 13V-608, Triumph first provided to NHTSA the first calendar quarterly report for 2014 on May 20, 2014. Please see attached document. The source of this information was received from Scott Callander, After-Sales Manager, Triumph North America. This information was last gathered on May 22, 2015.

24. **On or about September 26, 2014, NHTSA informed Triumph that according to our records, Triumph's second calendar quarterly report for Recall No. 14V-009 was due on or before July 30, 2014, and that we had not received this report. Answer the following:**

- a. **State the date that you first provided this quarterly report to NHTSA.**
- b. **If you contend that the date was before July 30, 2014, produce all documents to support your contention.**

***Response to Request No. 24a-b:***

Triumph's second calendar quarterly report for Recall No. 14V-009 was submitted to NHTSA on September 29, 2014. Please see attached document. The source of this information was received from Scott Callander, After-Sales Manager, Triumph North America. This information was last gathered on May 22, 2015.

**25. With respect to other quarterly reports required for Recall No. 14V-009, state the date that you first provided to NHTSA the first calendar quarterly report for 2014.**

***Response to Request No. 25:***

Triumph's first calendar quarterly report for Recall No. 14V-009 was first provided to NHTSA on May 20, 2014. Please see attached document. The source of this information was received from Scott Callander, After-Sales Manager, Triumph North America. This information was last gathered on May 22, 2015.

**26. On or about February 25, 2015, NHTSA informed Triumph that according to our records, Triumph's fourth calendar quarterly report for Recall No. 14V-009 was due on or before January 30, 2015, and that we have not received this report. Answer the following:**

- a. State the date that you first provided this quarterly report to NHTSA.**
- b. If you contend that the date was before January 30, 2015, produce all documents to support your contention.**

***Response to Request No. 26a-b:***

Triumph's fourth calendar quarterly report for Recall No. 14V-009 was first provided to NHTSA on February 25, 2015. Please see attached document in "Request No. 24" above. The source of this information was received from Scott Callander, After-Sales Manager, Triumph North America. This information was last gathered on May 22, 2015.

**27. On or about February 25, 2015, NHTSA informed Triumph that according to our records, Triumph's fourth calendar quarterly report for Recall No.14V-548 was due on or before January 30, 2015, and that we have not received this report. Answer the following:**

- a. State the date that you first provided this quarterly report to NHTSA.**
- b. If you contend that the date was before January 30, 2015, produce all documents to support your contention.**

***Response to Request No. 27a-b:***

Triumph's fourth calendar quarterly report for Recall No. 14V-548 was first provided to NHTSA on February 25, 2015. Please see attached document. The source of this information was received from Scott Callander, After-Sales Manager, Triumph North America. This information was last gathered on May 22, 2015.

**28. On or about February 25, 2015, NHTSA informed Triumph that according to our records, Triumph's fourth calendar quarterly report for Recall No. 14V-694 was due on or before January 30, 2015, and that we have not received this report. Answer the following:**

- a. State the date that you first provided this quarterly report to NHTSA.**
- b. If you contend that the date was before January 30, 2015, produce all documents to support your contention.**

***Response to Request No. 28a-b:***

Triumph's fourth calendar quarterly report for Recall No. 14V-694 was first provided to NHTSA on February 25, 2015. Please see attached document. The source of this information was

received from Scott Callander, After-Sales Manager, Triumph North America. This information was last gathered on May 22, 2015.

**AFFIDAVIT OF DONALD CARLEO**

I, Donald Carleo, being duly sworn, state as follows:

1. I am the Chief Financial Officer of Triumph Motorcycles (America), Ltd.
2. Triumph Motorcycles (America) Ltd. has undertaken an inquiry to assure that the answers and production of documents in response to the Special Order dated April 29, 2015 are complete and correct.
3. That Triumph Motorcycles (America) Ltd. has searched diligently, and is continuing to search, for documents that are responsive to the Special Order dated April 29, 2015.
4. That all documents in the possession of Triumph Motorcycles (America) ltd. that are responsive to the Special Order of 4/29/2015 are being provided to NHTSA.
5. That any responses to the inquires provided to NHTSA respond as completely as possible, to date, to the Special Order of 4/29/15.
6. That any partial responses that require a more complete response will be provided to NHTSA by and including June 9, 2015.

Dated May 26, 2015

  
\_\_\_\_\_  
DONALD CARLEO  
CFO, TRIUMPH MOTORCYCLES  
(AMERICA) LTD.

Sworn to before me this  
26th day of May, 2015

  
\_\_\_\_\_  
NOTARY PUBLIC

