U.S. Department of Transportation

National Highway Traffic Safety Administration

ODI RESUME

OFFICE OF DEFECTS INVESTIGATION
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Investigation: RQ 17-006
Date Opened: 08/09/2017
Investigator: Xiaoming Tan **Reviewer:** Kara Fischer
Approver: Stephen Ridella
Subject: 15E-013 scope and remedy

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: Hickory Springs Manufacturing Company
Products: 2014-2016 Hickory Spings Quad Step - multiple models
Population: 17,469 (Estimated)

Problem Description: Step rivets can shear affecting the integrity of the steps which could cause the user to fall resulting in injury.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	2	TBD	TBD
Crashes/Fires:	0	TBD	TBD
Injury Incidents:	1	TBD	TBD
Number of Injuries:	1	TBD	TBD
Fatality Incidents:	0	TBD	TBD
Number of Fatalities:	0	TBD	TBD

ACTION / SUMMARY INFORMATION

Action: A Recall Query has been opened to evaluate the scope and remedy identified in Hickory Springs safety recall 15E-013.

Summary:

Hickory Springs Manufacturing Company (HSM) filed recall 15E-013 on February 20, 2015 to remedy 6,498 Quad Step series RV steps built between October 18, 2012 and February 14, 2014 due to rivet failures. This condition can result in the rivet(s) shearing on the 2nd, 3rd, or 4th steps, potentially resulting in injury to the user. At the time of the recall, HSM reported one RV step failed because of a rivet shearing at the 2nd to 3rd step joint. The remedy was to drill out the affected rivets and install a bolt and washer/locknut assembly. HSM provided a list of all purchasers of their steps that were affected by the recall. After February 14, 2014, a larger, more robust rivet was used in the assembly as a permanent solution.

On March 24, 2015, KZRV, L.P. (KZRV), submitted recall 15V-173 covering numerous RV models equipped with HSM Quad Steps either supplied directly from HSM or from Lippert Component Inc. (LCI).

On March 27, 2015, HSM submitted an amended recall to include an additional 10,971 Quad Steps, bringing the total number of defective steps to 17,469. To date, the reported remedy completion rate on the subject steps in recall 15E-013 is 51.9%.

In March 2017 and then in May 2017, NHTSA received two Vehicle Owner Questionnaires (VOQs, 10984048 and 10966540 respectively). The first VOQ involved a 2015 KZRV Durango, and the second VOQ involved a 2016 KZRV Durango. Both complaints alleged Quad Step rivet failures on the 3rd to 4th step and neither of the steps were included in the KZRV (15V-173) recall. The owner of the 2016 Durango fell resulting in personal injury. The owner of the 2015 KZRV did not receive a recall owner letter and was informed by the servicing dealer that the RV was outside the scope of the recall. The 2016 KZRV Durango was also not covered by KZRV's recall 15V-173. NHTSA provided

these complaints to KZRV on May 17, 2017, for a potential scope and remedy concern related to their 573 submission. KZRV informed NHTSA on June 30, 2017, that the 2015 Durango should have been within the scope of their recall, but that KZRV was unaware of the increased scope that was provided by HSM in their amended recall submission in March 2015.

This Recall Query is being opened to investigate how HSM determined the scope of recall 15E-013, how they notified the purchasers of the defectives steps of the updated scope after the March 2015 amended submission, and to investigate the new design rivet used in production following the recall announcement.