

Judy Bolton
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August 31, 2017

Via Email: alexander.ansley@dot.gov

Mr. Alexander Ansley
NHTSA
Office of Defects Investigation
1200 New Jersey Ave., SE
Washington, DC 20590

Re: NHTSA Audit Query AQ17-003
Response to Request for Additional Information

Dear Mr. Ansley:

LDRV Holdings Corp. d/b/a Lazydays RV ("Lazydays") is in receipt of a letter from NHTSA, dated August 3, 2017, requesting information with regard to Winnebago recalls between the years 2015 and 2017. A copy of that letter is attached for your reference.

Specifically, NHTSA is requesting information on 19 vehicles that were identified by Winnebago as being subject to a recall within the above timeframe.

Please see Lazydays' responses, to your specific requests, below.

RESPONSES TO INFORMATION REQUESTS

1. For each vehicle identification number ("VIN") listed below in Table A, identify the following:
 - a. The disposition of the vehicle (e.g., sold, leased, etc.);
 - b. The date of the disposition you identified in (a);
 - c. The date on which the vehicle left the possession of Lazydays RV (e.g., delivery date to purchaser);
 - d. The date on which the recall remedy was performed on the vehicle.

Provide your response in a table in Microsoft Access or Excel entitled Vehicles AQ17-003.

Table A

1	3C6URVJG2HE	
2	WDAPF4CC3G9	
3	WDAPF4CC9G9	

4	8BNPF4CC0GE	
5	1FDXE4FS8GD	
6	1FDXE4FSXGD	
7	1FDXE4FSXGD	
8	1F65F5DY9G0	
9	1F65F5DY9G0	
10	1FDWS8PV6GK	
11	1FDWS8PV1GK	
12	1FDWS8PVXGK	
13	WDAPF4CA3F9	
14	3C6URVJG5FE	
15	4UZFCUCY8FC	
16	4UZFCUCY0FC	
17	4UZFCUCY8FC	
18	WDAPF4CC8FP	
19	1F66F5DYXFC	
20	WDAPF4CC8FP	

Note: This is a duplicate of #18.

Response: See Attached Excel Spreadsheet entitled AQ17-003.

2. Produce copies of all communications, including delivery checklists or other documents that substantiate purchaser (or lessee) delivery dates, that evidence or are otherwise related to your responses to each item within the scope of Request No. 1. Organize the documents separately by VIN.

Response: Please see attached documents (Bates Numbered LD2-000001 through LD2-000078) as they correspond to Table A above and are shown on the excel spreadsheet entitled AQ17-003

3. Provide Lazydays RV's policy for the process it conducts when it receives recall notice from Winnebago. Provide the date this policy was implemented. Also, explain if any changes have been made to its policy after the discovery that new vehicles were delivered with outstanding safety recalls.

Response:

TRAINING REGARDING RECALL POLICY

Sales and Service employees are trained annually on the following regarding recalls:

- Federal law prohibits selling new vehicles with an unperformed recall
- All vehicles in inventory must be checked for open recalls
- Any open recall must be completed prior to the sale

- If a recall cannot be completed, due to parts not being available, etc., that vehicle will be barred from sale.
- If a new recall is discovered after the sale, but before delivery, that vehicle must not be delivered until the recall is completed.
- Any vehicle subject to a manufacturer's Stop Sale Notice cannot be sold.
- Company policy prohibits selling a vehicle that is subject to an uncompleted recall, even if the customer offers to sign a waiver to purchase a unit barred from sale.

RECALL PROCESS

As new recalls are received by the manufacturer, the Recall Coordinator reviews inventory to identify units subject to the recall. Units covered by a recall are marked "NOT FOR SALE" and a line is added to a Repair Order for the vehicle directing that the recall be performed. When the recall cannot be performed because parts are not available, etc., the unit remains "NOT FOR SALE" until the parts become available.

If any recall is received after a sale but prior to delivery, recalls are to be completed before delivery.

As a further precaution, to ensure a recall was not missed, all units are checked for recalls prior to delivery.

PROCESS IMPROVEMENTS

Compliance and the safety of our customers is of utmost importance to Lazydays. We employ a Legal Department, compliance personnel, a Recall Coordinator as well as numerous administrative personnel, to fulfill our responsibilities under all applicable laws and regulations.

As a result of the findings made during this inquiry by NHTSA, we have been reviewing our processes to enhance our procedures. All inventory is being reviewed to ensure that any vehicle subject to recall is withheld from sale until the recall service is completed. Additional training is being scheduled which focuses exclusively on the recall process. The training will remind employees that any employee who fails to follow the recall process is subject to disciplinary action, including termination. Employees who failed to follow the recall process are being held accountable and will receive appropriate disciplinary action. Lazydays recently hired an internal auditor and one of his areas of focus will be auditing compliance with our recall policy.

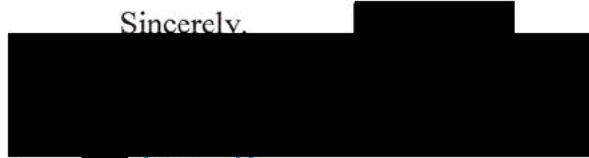
4. Provide any additional information Lazydays RV considers important for the agency to consider in reviewing and evaluating Lazydays RV's responses to any of the requests above. As one example, identify any anomalies in the data or documents and explain the reason(s) for those anomalies.

Response: See earlier responses.

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Should you have any questions regarding the responses or the documents provided, please do not hesitate to contact me. Thank you.

Sincerely,

A large black rectangular redaction box covering the signature area.

Judy Bolton
Director of Compliance

JB/an
Enclosures