

Request 12:

12. Describe all modifications or changes made by, or on behalf of, Thor in the design, material composition, manufacture, quality control, supply, or installation of the subject components, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject 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. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

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

Response:

The following are changes or modifications made to the subject hitch from the start of production to date.

1. Change Hitch Receiver Suppliers from Cequent (Reese) to Lippert (LCI). ECN 10937.
 - a. August 2014.
 - b. Lippert developed a near-copy of the Reese Hitch as a direct swap. No changes were needed to switch from the Reese Hitch to the Lippert Hitch.
 - c. Cost Reduction.
 - d. DAX 0232086 / 0256245 Reese Hitch.
 - e. DAX 0311378 / 0311379 /Lippert Hitch.
 - f. No. Inventory was consumed as a running change.
 - g. August 2014
 - h. Yes. The Reese and Lippert hitches are completely interchangeable.ECN 10937 is attached in Appendix 1.

2. Increase Hitch capacity from 5000 lbs to 8000 lbs. ECN 10951.
 - a. September 2014.
 - b. The towing capacity of the hitch was increased. The design of the hitch remained unchanged. Lippert had retested their hitch to prove that the 8,000 lb capacity could be met. This is PEI test 2014-1173. Tested as LCI part # 347628, which

was a 5,000 lb hitch retested to 8,000 lb. The hitch load carrying capacity (tongue weight) remained the same at 500 lbs.

- c. Our sales department was demanding that we upgrade our hitch to 8,000 lb capacity to flat-tow larger vehicles and to compete against our primary competitor: Forest River.
- d. DAX 0311378 / 0311379 Lippert Hitch.
- e. DAX 0312095 / 0312096 Lippert Hitch. LCI numbers 360232 / 360231.
- f. No. Inventory was consumed as a running change.
- g. September 2014.
- h. Yes. The 5000 lbs and 8000 lbs Lippert hitches are completely interchangeable, with the only discernible difference being the label applied.

ECN 10951 is attached in Appendix 2

3. Hurricane/Windsport revised hitch mount design for MY2016. ECN 11101.

- a. February 2015
- b. Same Build all Hurricane/Windsport models with the C-channel extension design, where the hitch bolts directly to the bottom side of a C-Channel frame extension, for Model Year 2016.
- c. Cost reduction and standardization with other Class-A models already using this hitch.
- d. Cequent Part # 7104 – FWI Part # 0111300 DAX 0311654 LCI number 354528
- e. DAX 0312096 Lippert Hitch. LCI number 360231.
- f. NO, the original hitch was still being used for Class-C motorhome application. .
- g. September 2014.
- h. No.

ECN 11101 is attached in Appendix 3

4. Add the Gusset to the rear of the frame extensions of all Class-A motorhomes utilizing the LCI hitch 360231 and 360232 hitches. All Hurricane, Windsport, ACE, Challenger, Miramar, and Outlaw motorhomes. ECN 13586 and ECN 13627.

- a. At the beginning of the 2018 Model Year: February 2017.
- b. A gusset (steel plate) was added across the open end of the rear C-channel frame extension of all Thor Motor Coach motorhomes that were using this hitch design.
- c. Engineering had received in November 2016 from Customer Service some photos showing cracking at the rear frame extension, directly above the hitch. Engineering made modifications/reinforcement to the frame extension in time for MY2018 launch.
- d. There is not a part for the rear frame extension itself, as each model has a slightly different length of frame extension. But drawing TFM4207 is a good representation of the typical design before the gusset was added.
- e. There is not a part number for the gusset, but drawing TFM4796 shows the added gusset, and drawing TFM4773 shows the gusset installed into the frame extension and is a good representation of the revised design.
- f. Yes, at the end of the 2017 model year.

- g. The revised gusseted rear extension was a modification of a weldment assembly, and was not made available as a replacement part.
- h. It cannot easily be replaced/interchanged. Welding would be required. Access is limited.

ECN 13586 is attached in Appendix 4

ECN 13627 is attached in Appendix 5

Source: TMC Engineering

This information was gathered on October 10, 2024.