INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

Grand Design RV LLC
11356 County Road 2,
Middlebury, IN 46540

PUBLIC VERSION

February 14, 2025

VIA ELECTRONIC SUBMISSION ONLY

Mr. Josh Neff
Chief, Medium & Heavy Duty Vehicle Defect Division
National Highway Traffic Safety Administration (NHTSA)
Office of Defects Investigation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Subject: Grand Design RV LLC's Response to NHTSA Information Request in PE24-029

Dear Mr. Neff:

Enclosed is Grand Design RV LLC's ("GDRV") response to the National Highway Traffic Safety Administration's ("NHTSA") Office of Defects Investigation ("ODI") December 17, 2024 Information Request (sometimes referred to below as "IR") in connection with the agency's Preliminary Evaluation ("PE") (PE24-029).

GDRV's response to this IR was prepared pursuant to a diligent search for the requested information. GDRV has employed its best efforts to provide responsive information. We would be pleased to meet with agency personnel to discuss any aspect of this IR response.

I. General Responses

A. On December 17, 2024, NHTSA sent GDRV an IR via e-mail. The IR set forth a due date of January 31, 2025. On December 19, 2024, GDRV timely submitted a request for an extension of time to respond to the IR, in its entirety, until March 3, 2025. On January 2, 2025, NHTSA partially granted GDRV's request and extended due date to respond to the questions of the IR in their entirety until February 14, 2025. On February 14, 2025, due to technical difficulties experienced with the agency's file transfer portal, the agency granted GDRV another

extension to submit all documents responsive to question 4 until February 21, 2025. Accordingly, GDRV hereby timely submits its IR response.

B. GDRV's response to this IR was based on good faith searches of locations where responsive documents kept in the ordinary course of business would normally be found, and in consultation with current personnel knowledgeable about the information requested.

C. Consistent with its General Objections set forth below, GDRV has made a good faith effort to collect the information necessary to respond to the IR and reserves the right to amend and/or supplement this response, as appropriate.

D. Without waiving any objections set forth below, GDRV's responses reflect information for and are limited to all "Subject vehicle(s)" equipped with the "Subject system(s)" with the "Alleged defect,"[1] as those definitions appear in the Information Request.

E. GDRV reserves the right to recapture privileged or otherwise protected or exempted documents that may have been inadvertently produced in response to this IR under applicable law. Any inadvertent production of privileged material is not, and should not be interpreted as, a waiver of any applicable privilege.

F. As directed by the agency in the IR, for each applicable question, GDRV repeated the request verbatim above each response and identified the source of the information and the last date the information was gathered. GDRV's responses reflect its best, good faith understanding of applicable information and data as of the date identified in each response.

G. GDRV reserves the right to update and supplement this response and any subsequent responses as new information comes available or where certain requests for information could not be fully provided with in the time allowed.

II. General Objections

The General Objections set forth below are hereby incorporated by reference into each and every one of GDRV's responses to the IR. These General Objections apply to today's response, and any subsequent supplementation. These General Objections are also deemed as continuing as to each subpart of the IR question, and are not waived, nor in any way limited, by the specific responses to a subpart. No failure to specifically incorporate General Objections shall be construed as a waiver. Moreover, any applicable, good faith objection not raised in this section shall not be interpreted as a waiver.

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A. GDRV respectfully objects to the definition of "document(s)" set forth in the IR because it is unreasonably broad and ambiguous in the context of the information sought by this IR.

B. GDRV respectfully objects to the definition of "Subject vehicles" to the extent that it encompasses vehicles not manufactured by GDRV for sale or lease in the United States.

C. GDRV respectfully objects to the definition of "GDRV" because it is unreasonably broad, vague, and ambiguous in the context of the information sought by this IR. Without waiving said objection, GDRV will respond to NHTSA's requests using reasonable, good faith searches of responsive business records kept in the ordinary course of business at appropriate business locations.

D. GDRV reserves the right to interpose additional good faith objections, as appropriate.

III. Request for Confidential Treatment & Freedom of Information Act Protections

Pursuant to 49 C.F.R. Part 512, GDRV is submitting a request for confidential treatment of confidential business information in conjunction with its response to NHTSA's IR. Material that appears in brackets is confidential business information.

Additionally, GDRV believes NHTSA's policy is to protect the privacy of individuals under Exemption 6 of the Freedom of Information Act, 5 U.S.C. 552(b)(6), and applicable law and guidance thereunder. To the extent information is provided to NHTSA that contains the name, address, and other personal information of owners or other individuals, including GDRV personnel, or otherwise, GDRV respectfully requests that NHTSA not make public any such private information.

IV. Specific Responses

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

a. Vehicle identification number (17-character VIN);

b. Make;

c. Model;

d. Model Year;

e. Date of Manufacture (MM/DD/YYYY);

f. Date warranty coverage commenced (MM/DD/YYYY);

g. Floor plan identification;

h. Length of vehicle;

i. Gross Vehicle Weight Rating (GVWR);

j. Facility of manufacture;

k. Subject component part number and design version;

l. Subject component serial number;

m. Subject component Date of Manufacture (MM/DD/YYYY);

n. Facility of manufacture for the subject component;

o. Identify how the body of each vehicle is attached to the frame, including what type of hardware, the size and quantity.

Provide the table in Microsoft Excel 2010, or a compatible format, entitled "PRODUCTION DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

Response to Request 1

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

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2. **State the number of each of the following, received by GDRV, or of which GDRV is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:**

   a. **Consumer complaints, including those from fleet operators;**

   b. **Field reports, including non-dealer and dealer field reports;**

   c. **Reports involving a crash, injury or fatality;**

   d. **Property damage claims;**

   e. **Third-party arbitration proceedings, both pending and closed, where GDRV is or was a party to the arbitration; and**

   f. **Lawsuits, both pending and closed, in which GDRV 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 GDRV's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" 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.

   Response to Request 2

   CONTAINS CONFIDENTIAL BUSINESS INFORMATION

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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. GDRV'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, email address and telephone number (please use distinct fields for each data type);

d. Vehicle owner street address, city, state (postal abbreviation), and Zip code (please use distinct fields for each data type);

e. Vehicle's 17-character VIN;

f. Vehicle's make, model and model year (please use distinct fields for each data type);

g. Location of compartment door affected if opening alleged;

h. Location of slide out affected if extension alleged;

i. Location of lock/latch affected if failure alleged;

j. Incident date (MM/DD/YYYY);

k. Report or claim date (MM/DD/YYYY);

l. Whether a crash is alleged;

m. Whether property damage is alleged;

n. Number of alleged injuries, if any; and

o. Number of alleged fatalities, if any.

p. State whether or not the vehicle has been inspected by the procedures within TSB 24-001; if not explain the delay.

q. Provide the results of the inspection.

r. If repairs were necessary, what repairs, and were they completed in the field.

s. If the owner was told to return the RV to the factory for repairs, have those repairs been completed.

Provide this information in Microsoft Excel 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

Response to Request 3

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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 GDRV used for organizing the documents. Describe in detail the search methods and search criteria used by GDRV to identify the items in response to Request No. 2.**

Response to Request 4

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5. **State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by GDRV to date that relate to, or may relate to, the alleged defect in the subject 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. GDRV's claim number;

   b. Vehicle owner, email address and telephone number (please use distinct fields for each data type);

   c. Vehicle owner street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);

   d. 17-character VIN;

   e. Repair date (MM/DD/YYYY);

   f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);

   g. Labor operation number(s);

   h. Problem code(s);

   i. Replacement part number(s) and description(s);

   j. Concern stated by customer;

   k. Cause as stated on the repair order;

   l. Correction as stated on the repair order;

m. Location of compartment door affected if opening alleged;

n. Location of slide out affected if extension alleged;

o. Location of lock/latch affected if failure alleged; and

p. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Excel 2010, or a compatible format, entitled "WARRANTY DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

Response to Request 5

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6. Describe in detail the search methods and search criteria used by GDRV to identify the claims in response to Request No. 5, including the labor operations, problem codes, part numbers, key word(s) and any other pertinent parameters used.

Response to Request 6

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7. **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 whether the codes are automatically reported to the warranty database electronically or manually entered the warranty database by a claims administrator.**

Response to Request 7

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

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8. State, by make and model year, the terms of the new vehicle warranty coverage offered by GDRV 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 GDRV 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.

Response to Request 8

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

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9. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that GDRV 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 GDRV is planning to issue within the next 120 days.

Response to Request 9

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

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10. 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, GDRV. 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 10

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11. Describe all modifications or changes made by, or on behalf of, GDRV 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 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 GDRV is aware of which may be incorporated into vehicle production within the next 120 days.

Response to Request 11

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12. State the number of each of the following that GDRV has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

a. Subject component; and

b. Any kits that have been released, or developed, by GDRV for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which GDRV is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response to Request 12

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

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13. Describe GDRV's process for the following as relative to the alleged defect in the subject vehicles:

a. Procedure to determine if a customer's incident relates to safety;

b. Metrics used to assess the safety concern;

c. The use of TSB 24-001 to determine if the vehicle had excessive frame flex;

d. How which compartment or entry door affected was identified;

e. How the type of hinge (top or side) of the affected compartment was determined

e2. How which slide out affected was identified; and

f. How which door lock/latch affected was identified.

Response to Request 13

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14. Furnish GDRV's assessment of the alleged defect in the subject vehicles, 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 14

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Certificate of Corporate Responsibility for Reports

I, Troy M. Cornell, pursuant to 49 U.S.C. 30166(o), state as follows:

1. I am the Director of Product Safety and Compliance in Winnebago Industries, Inc. and I am authorized by Grand Design RV LLC ("GDRV"), to execute this certificate on its behalf.

2. I have reviewed the foregoing submission and, based on my knowledge, the submission does not contain any untrue statement of a material fact; or omit to state a material fact necessary in order to make the statements made not misleading, in light of the circumstances under which such statements were made.

3. I directed a good faith inquiry be conducted that would be reasonably calculated to assure that GDRV's responses are complete and correct, and that documents within the possession, custody and control of GDRV be searched diligently for information responsive to the Information Request to be produced to NHTSA.

4. Based on information provided to me, inquiry has been made of the persons and offices reasonably calculated to have responsive information and documents, and the answers to the Information Request are correct based upon GDRV's investigation to date.

5. GDRV's review is ongoing, and GDRV reserves the right to supplement or clarify these responses if appropriate to do so.

6. I certify under penalty of perjury that the foregoing is true and correct.

Executed this 14th Day of February 2025.



Troy M. Cornell