

COUNTRY COACH INC

THE WORLD'S FINEST MOTORCOACHES

Mr. Jonathan White
Recall Analysis Division
National Highway Traffic Safety Administration
400 7th Street, S.W.
Washington, D.C. 20590

February 02, 2004

Dear Mr. White:

Country Coach, Inc. has determined that twenty Model Year 1996 – 1998 Magna motor homes it manufactured fail to conform to Federal Motor Vehicle Safety Standard No. 120, *Tire selection and rims for motor vehicles other than passenger cars*. This noncompliance is related to Motor Vehicle Safety.

It has been determined that the identified motor homes were erroneously assigned inadequate front axle weight ratings on the front. In some cases, this noncompliance could cause premature front tire tread wear or a tire failure during normal driving which could lead to a loss of steering control and potentially result in a vehicle accident.

To date, we have not received any reports of blowouts on motor homes included in this proposed recall. To correct the situation as described in paragraph 2, Country Coach will re-rate inadequate axle weight ratings replace the front tires, and issue new Federal tire labels. This work will be performed pursuant to the attached Noncompliance Report Pursuant to 49 CFR Part 573, the bulletin to Country Coach service providers, and the letter to motor home owners.

If you should have any questions, please feel free to contact me at 541-998-3720 x382.

Please let me know if you have any questions.

Sincerely,



Dick Sabath
Quality Assurance and Compliance Administration
Country Coach, Inc.

Enclosures (6)

*Corporate Office/
Product Sales Support*
(541)998-8720
(800)547-8075
Fax: (541)998-6687

Manufacture Sales Support
(541)998-3001
(800)654-0223
Fax: (541)998-8710

Parts & Service
(541)998-9202
(800)452-8015
Fax: (541)998-5161
Fax: (541)998-8043

PO Box 400
135 East First Avenue
Junction City, OR 97448

www.countrycoach.com

**Noncompliance Information Report
Pursuant to 49 CFR part 573**

Country Coach, Inc. has determined that certain motor homes it manufactured fail to conform to Federal Motor Vehicle Safety Standard No. 120, *Tire selection and rims for vehicles other than passenger cars*. Country Coach is hereby providing notification to your office in accordance with 49 CFR Part 573.

The information required by your regulations follows.

1. **573.5 (c)(1) Manufacturer's name and address:**

Country Coach, Inc.
135 East First Ave.
P.O. Box 400
Junction City, OR 97448

2. **573.5 (c)(2) Equipment involved in this notification:**

Model Year 1996 – 1998, Magna motor homes manufactured from 12/95 through 12/97

VIN Range: 46GED1818S1052562 – 46GED2212V1052754

Vehicle Type: MPV

Bodystyle: Motor Home

3. **573.5 (c)(3) Total number of items of equipment:**

A total of 5 Model Year 1996 –All 5 motor homes are consumer owned.

A total of 10 Model Year 1997 –All 10 motor homes are consumer owned.

A total of 5 Model Year 1998 –All 5 motor homes are consumer owned.

A total of 20 motor homes are involved.

4. **573.5 (c)(4) Approximate percentage of equipment estimated to actually contain the noncompliance:**

100% of the motor homes identified in item 2, above, are noncompliant with FMVSS No. 120, *Tire selection and rims for vehicles other than passenger cars*.

5. **573.5 (c)(5) Description of the noncompliance:**

Brief summary of noncompliance:

The identified Magna motor homes were assigned inadequate front axle weight ratings. As a result, these motor homes do not comply with Federal Motor Vehicle Safety Standard No. 120, *Tire selection and rims for vehicles other than passenger cars*.

Detailed description of noncompliance:

FMVSS No. 120 specifies requirements for the selection and marking of tires and rims for motor vehicles other than passenger cars. The motor homes cited above were assigned inadequate front axle weight ratings on their Federal tire labels. As a result, the tires installed on these motor homes do not comply with S5.1.2 and S5.3.1 of FMVSS No. 120. In some cases, this noncompliance could lead to premature tire wear and potentially a tire failure. Such a tire failure could result in the loss of steering control and could result in a motor vehicle accident.

6. **Chronological summary of events leading to this determination:**

In Late November 2003 a customer brought to our attention that the Country Coach Magna motor home they owned was over weight on the front axle. In mid December 2003, it was verified that this particular motor home was overweight on the front axle and the over weight condition was not the result of unequal cargo weight distribution or excessive owner cargo. Based on the information gathered from this motor home an engineering model was developed and applied against other Magna model motor homes. Nineteen additional motor homes were determined to potentially have the same noncompliance on January 27, 2004. The customer coach cited above is the twentieth motor home in this recall.

7. **573.5 (c)(8) Description of proposed remedy:**

Country Coach will re-rate the front axle weight rating and replace both front tires of the affected motor homes. In addition, new Federal tire labels reflecting corrected cold tire inflation pressures and axle weight ratings will be issued. The new tires and Federal tire labels will be provided at no cost to motor home owners. The front axles were determined to have been de-rated when the motor homes were manufactured. The existing front axle rating is 10,410 lbs. The axle will be re-rated to 12,000 lbs. Tire size will increase from 265/75R22.5 to 275/70R22.5

and cold tire inflation pressures will increase from 110 PSI to 120 PSI. The labor required to change the Federal tire label is not expected to exceed one-quarter (1/4) hour. The labor to change two front tires is not expected to exceed two (2) hours. All removed tires shall be destroyed. The field remedy is unique to these motor homes since they are no longer manufactured with the same configuration of axle and tires.

8. Program for Remedy Campaign:

Country Coach will notify all owners of the affected motor homes and will offer to remedy the motor homes free of charge. Noncompliance notices will be mailed to the owners of the affected motor homes and a Dealer Vehicle Safety Noncompliance Service Bulletin will be mailed to all dealers on or before February 10, 2004. All mailings will be by Certified Mail, Return Receipt Requested, and First Class Mail.

9. Tire Disposal Plan:

Tires are to be disposed of in accordance with state or local laws. If state or local laws do not apply, then the tires should be disposed of in a generally accepted environmental manner consistent with local, state and/or federal laws. Country Coach will pay the reasonable cost of the lawful and environmentally accepted disposal of recalled tires.

VEHICLE SAFETY
NONCOMPLIANCE
SERVICE BULLETIN

04V-043 ⑤ of ⑩

VIA: CERTIFIED MAIL, RETURN RECEIPT REQUESTED, AND
FIRST CLASS MAIL

xx February 2004

RE: VEHICLE DEFECT OWNER NOTIFICATION, (TBD)

Dear Country Coach Owner:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

DESCRIPTION OF NONCOMPLIANCE:

Country Coach, Inc. has determined that certain motor homes it manufactured fail to conform to Federal Motor Vehicle Safety Standard No. 120, *Tire selection and rims for motor vehicles other than passenger*. This noncompliance is related to Motor Vehicle Safety. The noncompliance condition is related to a miscalculation of the motor homes' front axle weight rating (FAWR). The FAWR as stated on the Federal tire label is inadequate for these motor homes. As a consequence, the tires selected for these motor homes do not comply with FMVSS 120. In some cases, this noncompliance could cause premature front tire tread wear, tire failure, tire air loss, or tire tread separation, which could result in premature tire tread wear or tire failure, resulting in loss of steering control and potentially result in a vehicle accident.

MODELS AFFECTED:

Model Year 1996 – 1998, Magna motor homes manufactured from 12/95 through 12/97

The existing front axle of your motor home is rated at 10,410 lbs. This recall re-rates it to 12,000 lbs. To accommodate the increased weight carrying capability of the re-rated axle, the existing front tires will be replaced with 275/70R22.5 tires to remedy the noncompliance. In addition, Federal tire labels will be replaced to reflect the re-rated front axle and new tire size. This work will be performed at no cost to the consumer. The removed parts must be destroyed. The amount of labor required to perform this repair is not expected to exceed two (2) hour.

Please contact your nearest Country Coach dealer as soon as possible to arrange a service date. Please present this letter and the enclosed warranty claim to the dealer when you take your motor home in to be serviced. The

**VEHICLE SAFETY
NONCOMPLIANCE
SERVICE BULLETIN**

04V-043 ⑧ of ⑪

service facility that does the repairs will need the warranty claim for their billing. If you need assistance in locating your nearest Country Coach dealer, please contact Country Coach's customer service department at 1-800-452-8015. The service department will refer you to a service facility near you.

Country Coach has provided all of its dealers with instructions for making the necessary repairs. If your dealer fails to remedy the noncompliance on the agreed upon service date or within three (3) days of the scheduled service date, please contact Country Coach customer service by calling 1-800-452-8015 and asking for the technical service representative handling your coach model.

If after contacting both your dealer and Country Coach you are not satisfied that the noncompliance has been remedied within a reasonable time at no cost to you, you may wish to contact the National Highway Traffic Safety Administration at the following address or call the Auto Safety Hotline's toll free number:

Administrator
National Highway Traffic Safety Administration
400 7th Street, S.W.
Washington D.C. 20590

Auto Safety Hotline's toll free number 1-800-372-4273

If you have upgraded your motorhome, please let us know by completing and mailing the appropriate postage reply card.

We are sorry to cause you this inconvenience; however, we have taken this action in the interest of your safety and continued satisfaction with our products.

Sincerely,

Dick Sabath
Quality Assurance and Compliance Administration
Country Coach, Inc.

Enclosure (2)

cc: Gary Dwyer, Director, QA and Compliance, Country Coach, Inc.
Gary Obermire, Vice President, Engineering, Country Coach, Inc.

VEHICLE SAFETY
NONCOMPLIANCE
SERVICE BULLETIN

04V-043 ⑦ of ⑪

VIA: CERTIFIED MAIL, RETURN RECEIPT REQUESTED, AND
FIRST CLASS MAIL

xx February 2004

RE: VEHICLE DEFECT OWNER NOTIFICATION, (TBD)

Dear Country Coach Service Provider:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

DESCRIPTION OF NONCOMPLIANCE:

Country Coach, Inc. has determined that certain motor homes manufactured fail to conform to Federal Motor Vehicle Safety Standard 121, *the selection and rims for motor vehicles other than passenger cars*. This noncompliance is related to Motor Vehicle Safety. The noncompliance consists of a miscalculation of the motor home front axle weight rating (FAWR). The FAWR as stated on the Federal tire label is inadequate for the motor homes. As a consequence, the motor homes may not comply with FMVSS 121. In some cases, this noncompliance could cause premature front tire wear and/or tire failure during normal driving. The premature tire tread wear or tire failure could result in a loss of steering control and potentially result in a vehicle accident.

MODELS AFFECTED:

Model Year 1996 – 1998, Magna motor homes manufactured from 12/95 through 12/97

The existing front axle of these motor homes are rated at 10,410 lbs. This recall re-rates them to 12,000 lbs. To accommodate the increased weight carrying capability of the re-rated axle, the front tires will be replaced with 275/70Rx22.5 tires to remedy the noncompliance. In addition, Federal tire labels will be replaced to reflect the re-rated front axle and new tire size. This work will be performed at no cost to the consumer. The removed parts must be destroyed. The amount of labor required to perform this repair is not expected to exceed two (2) hour.

**VEHICLE SAFETY
NONCOMPLIANCE
SERVICE BULLETIN**

04V-043 ⑧ of ⑪

If the condition is not adequately repaired within a reasonable time, the owner may be entitled to an identical or reasonably equivalent motor home at no charge or to a refund of the purchase price less a reasonable allowance for depreciation.

To avoid having to provide these burdensome solutions, every effort must be made to promptly schedule an appointment with owners and to repair their motor homes as soon as possible. You should be aware that owners are instructed to contact the customer service department if their dealer does not remedy the condition within three (3) days of the mutually agreed upon service date. (Please see the enclosed Letter to Country Coach Owners) Owners are advised to contact the National Highway Traffic Safety Administration if the condition is not remedied without charge and within a reasonable time.

Sincerely,

PROPOSED
Dick Sabath
Quality Assurance and Compliance Administration
Country Coach, Inc.

Enclosure (2)

cc: Gary Dwyer, Director, QA and Compliance, Country Coach, Inc.
Gary Obermire, Vice President, Engineering, Country Coach, Inc.

**COUNTRY COACH**135 East 1st Avenue • P.O. Box 400 • Junction City, Oregon 97448 • (800)452-8015 • (541)998-9202 • (541)998-7303 [FAX]**Motor Home****PARTS LIST****02V-229**

Country Coach Part #	Quantity	Description
TIRE T27570R	2	TIRE
FTL001R	1	FEDERAL TIRE LABEL
MIT001R	1	MANUFACTURER ID LABEL

PROPOSED

**COUNTRY COACH**135 East J^W Avenue • P.O. Box 400 • Junction City, Oregon 97448 • (800)452-8015 • (541)998-9202 • (541)998-7303 [FAX]**VEHICLE OWNER REPLY CARD**
(NHTSA File No. TBD)

Model:
Motor Home Production Number:
Vehicle Identification Number:

Your motor home has been identified as subject to this Recall.

If you have sold or traded your motor home please complete the information as listed below.

Name and Mailing Address of Person or Entity to Whom You Sold or Traded the Motor Home:

Name: _____
Address: _____
City: _____ State: _____
Phone Number: () _____
Date Sold or Traded: _____

If you have changed your permanent mailing address, please complete the information as listed below:

Address: _____
City: _____ State: _____
Zip Code: _____ Phone Number: () _____

A self-addressed, postage paid envelope has been attached for your convenience.



04V-043 ① or ②

COUNTRY COACH135 East 1st Avenue • P.O. Box 400 • Junction City, Oregon 97448 • (800)452-8113 • (541)998-9202 • (541)998-8043 [FAX]**ATTENTION SERVICE PROVIDERS**

The Transportation Recall Enhancement, Accountability and Documentation (TREAD) Act of 2000 requires that vehicle tires removed as the consequence of a National Highway Traffic Safety Administration Recall be disposed of in a lawful manner. These tires may not be recycled in a way that allows their re-introduction into commerce nor may they be offered for resale or returned to the coach owner.

In order to assure compliance with the Tread Act, each tire replaced under Recall TBD shall have the below certification completed and returned to **CCI Compliance Administration**. A self-addressed, stamped envelope has been provided for the return of this form or it maybe faxed to 541-998-7303. Failure to return this Certification could cause a delay in the payment or denial of the Warranty Claim.

Thank you for your cooperation,

Compliance Administration
Country Coach

PROPOSED
REMOVAL OF TIRE DESTRUCTION and DISPOSAL

Service Provider: _____

Address: _____

Coach #: _____ VIN: _____

Tires removed under Recall TBD have been destroyed in accordance with all applicable Federal, State and Local laws and ordinances or If environmental laws do not apply, the tires are recycled in accordance with generally accepted environmental practices.

Service Provider's Signature: _____ Date: _____