

March 31, 2004

04V-158 ① or ②

Mr. George Person
Office of Defect Investigations
National Highway Traffic Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590

Dear Mr. Person:

SunnyBrook RV, Inc. has determined that a condition potentially involving vehicle safety may exist in our 33 foot 33RKFS fifth wheels with slide rooms on the upper frame decking in fifth wheels produced beginning July 22, 1996 through May 15, 1997. We are in the process of determining the customers who currently possess the fifth wheels that are involved.

During the stated time frame, 168 33RKFS fifth wheels were produced with an optional slide room assembled to the upper decking which may cause crowning, fractures or weld separation to the front frame cross-member, which connects to the hitch pin box. Crowning, fractures and weld separation have occurred primarily when the fifth wheels have experienced overloading, rough road conditions or excessive hitch weight. We have warranted or repaired 19 fifth wheels, which have exhibited related defects to the front cross-member or related components from our investigation initiated from Preliminary Evaluation PE04-009 through March 24, 2004. Of the 168 fifth wheels produced, all but ten, which have been repaired according to the recommended remedy, will be included in the recall. We are not aware of any injuries related to this defect.

Accordingly, SunnyBrook RV, Inc. is entering into a voluntary recall campaign. The remedy will consist of adding a 2" x 3" x 86" 11 gauge steel tube to the existing front cross-member and inspecting/repairing all welds, joints and structure of the upper frame decking for any related damage to all 162 33RKFS fifth wheels included in this campaign.

We will notify each owner identified through a third party title search and via our dealer network of affected fifth wheels. Dealers will be provided a diagram of the frame decking (identifying the defective cross-member), provided with the procedures to conduct an inspection and repairs and means of reimbursement. SunnyBrook RV, Inc. will at our discretion designate the authorized repair site for each subject vehicle. Owners will be notified in writing and be provided with a acceptance/waiver document which will be returned to SunnyBrook RV, Inc. in a postage paid return envelope for scheduling inspections and correction of the defect.

Please contact SunnyBrook RV, Inc. with the campaign number when assigned. If additional information is needed please contact me at (574) 825-5250 Ext. 51 or by email at whumphrey@sunnybrookrv.com or by fax at (574) 825-5433.

Sincerely,

William C. Humphrey
Controller

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On March 24, 2004, SunnyBrook RV, Inc. decided that a defect which relates to motor vehicle safety exits in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 **Defect and Noncompliance Responsibility and Reports**.

Date this report was prepared: April 1, 2004

Furnish the manufacturer's identification code for this recall (if applicable): _____

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and **mailing address** of the designated agent as prescribed by 49 U.S.C. §30164.

SunnyBrook RV, Inc.

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

William C. Humphrey
Controller

Telephone Number: (574) 825-5250 Ext. 51 Fax No.: (574) 825-5433

Name and Title of Person who prepared this report.

William C. Humphrey
Controller

Signed:

¹ Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210 or by FAX at (202) 366-7882.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): SunnyBrook & MOBILE SCOUT **Model Years Involved:** 1997

Model(s): 33RKFS FIFTH WHEELS (WITH BEDROOM SLIDES)

Production Dates: Beginning: 7/22/1996 **Ending:** 5/16/1997

VIN Range: Beginning: 4UBBS0R2VX1H06060 **Ending:** 4UBBSOR21V1H08425

Vehicle Type: Towable Fifth Wheel **Bodystyle:** 33RKFS w/Upper Deck Slide Room

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

The recalled vehicle is a 33 foot fifth wheel that has (2) slide out rooms. One on the lower deck and one on the upper deck. At the time of production no other fifth wheels produced at SunnyBrook RV, Inc. had a slide out room on the upper deck of the frame.

Make(s): _____ **Model Years Involved:** _____ **Model(s):** _____

Production Dates: Beginning: _____ **Ending:** _____

VIN Range: Beginning: _____ **Ending:** _____

Vehicle Type: _____ **Bodystyle:** _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): _____ **Model Years Involved:** _____ **Model(s):** _____

Production Dates: Beginning: _____ **Ending:** _____

VIN Range: Beginning: _____ **Ending:** _____

Vehicle Type: _____ **Bodystyle:** _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period. 85%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Vehicles Model	Year	Number of Potentially Involved
33RKFS	1996	80
33RKFS	1997	88

Total Number Potentially Affected by the Recall: 168

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100% of 33RKFS double slide fifth wheels produced in July 22, 1996 to May 16, 1997

Identify and describe how the recall population was determined—in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

Model Year 1997 33RKFS fifth wheels built with a slide room on the frame's upper-deck
The front cross-member on these fifth wheels were constructed using 1 ½" x 5" x 90 ¼"
4 gauge C-channel steel. Evidence from warranty repairs indicate that when the
additional weight from the upper slide room is added, the C-channel may flex under
extreme conditions, overloading and added hitch weight. The first 33RKFS fifth wheel
was produced July 22, 1996 and the C-channel was replaced via an Engineering Change
to a 2" x 5" x 90 ¼" 7 gauge steel tube on May 16, 1997. All fifth wheels histories for
units produced from January 1, 1997 to present were reviewed and only 33RKFS with the
upper slide room prior to the Engineering Change exhibited any failures.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The non-compliance is caused to the front cross-member (1 1/4" x 5" x 90 1/4" 4 gauge steel C-channel) of the frames upper deck. The front cross-member C-channel is connected to the hitch pin box, which connects to the tow vehicle. This cross-member may not be of adequate strength to withstand excessive loading and road stress.

Describe the cause(s) of the defect or noncompliance condition.

In 33RKFS fifth wheels with a slide room on the upper deck, the C-channel may flex and crown under conditions including overloading, extensive use, hitch weight in the upper deck area and/or road unevenness.

Describe the consequence(s) of the defect or noncompliance condition.

Fractures or crowning may occur to the C-channel and the front cross-member may fracture or break allowing the pin box to drop. Severe situations may cause the fifth wheel pin box to crown the front C-channel high enough to crack the fiberglass cap but unlikely to affect control of the connected tow vehicle.

Identify any warning which can (a) precede or (b) occur.

Upon inspection of the 33RKFS fifth wheel, there could be indication of weld cracks at the hitch pin box and connecting cross-beams. Other indications may be how level the cross-member at the front of the pin box is with the outside edges.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Venture Welding, A Division of Banks Lumber Co.; 2220 Middlebury St.; Elkhart IN 46516 (Assets of Venture Welding were sold to Leland Engineering in 2003; PO Box 698; White Pigeon, MI 49099)

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Tom Goss; Sales Representative; (269) 483-7681

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

On July 22, 1996, the first 33RKFS with a upper deck slide room was produced at SunnyBrook RV, Inc. In January or February 1997 three separate complaints were reported by dealers where consumers had complained that the front pin box area was flexing and appeared to be weak. On February 18, 1997, at the request of SunnyBrook RV, Inc. and Venture Welding, Progressive Engineering performed bending strength and Moment of Inertia testing on a 33RKFS frame and reported that the frame would provide support for the purpose intended with additional load cushion. After two additional complaints were received by dealers, an Engineering Change was proposed on May 6, 1997 to replace the front cross-member of the upper frame deck from a 1 1/2" x 5" x 90 1/4" 4 gauge steel C-Channel to a 2" x 5" x 90 1/4" 7 gauge steel tube. Fifth wheels began manufacture with this ECN on May 16, 1997. No formal complaint or warranty records had been recorded prior to this date. Until Preliminary Investigation PE04-009 was initiated on January 26, 2004 from complaint VOQ10049608 there had not been a concerted review of warranty records because there had not been any related warranties for fifth wheels manufactured after May 16, 1997. After a complete review (ending on March 24, 2004) of all 33RKFS fifth wheel histories manufactured from July 22, 1996 to present, we found that 19 33RKFS fifth wheels with an upper deck slide room had related repairs to correct weld breaks/cracks and fractures/crowning in the front C-channel cross-member. At the conclusion of our investigation on March 24, 2004, we notified Tom Bowman of our findings and our intent to enter into a voluntary recall of 33RKFS fifth wheels manufactured between July 22, 1996 and May 16, 1997.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

We will using a third party research firm to identify all current owners of 33RKFS fifth wheels and offer to inspect and correct any defects on the upper frame deck of all recalled fifth wheels. At the discretion of SunnyBrook RV, Inc., the remedy will include an offer to pick up the fifth wheel at nearest SunnyBrook RV dealership to the owners home and return it to the same site at no cost to the owner. Any owner who has paid for any repairs related to this defect will be reimbursed for all cost associated with correcting the related defect. If at SunnyBrook RV, Inc. discretion it is not economically viable to have the owner's fifth wheel to our facilities we will arrange to have an affiliated dealership perform the procedures to correct the defect.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

After consulting with our current frame supplier, our recommended method of remedy would be to add a 2" x 3" x 84" 11 gauge steel tube inside the existing C-channel. The existing C-channel will have a eight (8) 1/2" holes bored at evenly spaced intervals for weld points and the 2" x 3" tube will be welded at each weld point and top and bottom contact points. All weld points will inspected using dye penetrant and all cross-members checked for crowning or cracking. Any defective components will be replaced or repaired to return them to current specifications.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The remedy adds a section of 2" x 3" x 86" piece of 11 gauge steel tube to the existing frame structure. Moment of Inertia and bending strength tests indicate that the remedy will provide adequate support for the intended purpose plus a safety cushion of support.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The recall condition was corrected in production via an Engineering Change order to Venture Welding on 5/6/1997. The Engineering Change was implemented in frame entering production on 5/16/1997. The research of consumer complaints and warranties from 1997 to current production indicates that there have been no related complaints or warranty claims received since the Engineering Change. The Engineering Change replaced 1 1/2" x 5" x 90 1/4" 4 gauge steel C-channel with a 2" x 5" x 90 1/4" 7 gauge steel tube as the front cross-member in the upper deck of the frame on 33RKFS fifth wheels.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Complete recall criteria with NHTSA – April 5

Notify owners and dealers with letter and remedy – No later than April 15, 2004

Schedule inspections and correction appointment – Beginning April 15, 2004

Evaluation of responses – June 30, 2004

Initiate second contact if necessary – July 15, 2004

Foreseeable problems will include limited response because not all states require recreational vehicles to be registered and many owners of this model do not travel with them and are living at least seasonally as retirement homes in the fifth wheels.

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

Acceptance/Waiver Notification Form - SunnyBrook RV, Inc. Recall

A notice has been sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. SunnyBrook RV, Inc. has decided that a defect, which relates to vehicle safety, exists in certain 33RKFS fifth wheels produced from July 22, 1996 through May 15, 1997. The possibility of structural failure may occur with overloading, extensive use, added hitch weight and/or road unevenness. Our research indicates that you own the following 33RKFS fifth wheel that would be included in this campaign:

VIN# XXXXXXXXXXXXXXXXXXXX

The service, required parts and transportation to the authorized service center will be provided free of charge.

To correct this condition, SunnyBrook RV, Inc. or its authorized representatives will add a 2" x 3" x 86" 11 gauge steel tube to the existing front cross-member and inspect all welds, joints and structure of the upper frame decking for any related damage to your 33RKFS fifth wheel.

The work will take about 6 hours to complete. However, additional time may be required depending on appointment scheduling, transportation and inspection results. To obtain this free service, return the enclosed acceptance/waiver notification in the return envelope or contact Brian Philley at your earliest convenience at (574) 825-5250 Ext. 18 for inspection and correction. If you no longer own this vehicle, please inform us of this.

You may be eligible to receive reimbursement for the cost of obtaining a pre-notification remedy of a problem associated with this recall. For more information contact Brian Philley at (574) 825-5250 Ext. 18.

Please make a selection and provide the requested information and return to SunnyBrook RV, Inc in the enclosed postage paid envelope:

Recall Notification Election

(Please respond by writing "accepted" in the appropriate box on left below under Acceptance or Waiver of Rights)

Acceptance

☐	I accept the terms of the voluntary recall offered by SunnyBrook RV, Inc. Please contact me at the following address and/or telephone to schedule completion of the remedy.
	Name _____
	Address _____ _____
	Telephone - Home _____ Other _____

Waiver of Rights

☐	I waive my rights to participate in the voluntary recall at this time because my 33RKFS fifth wheel is permanently anchored or will not be towed on public highways.
☐	I waive my rights to participate in the voluntary recall because I no longer own the fifth wheel listed above. If known please provide the name of the owner to who the vehicle was sold _____

Signature _____

Date _____

(Date)

(Dealer Name)

(Customer Address)

Dear (Dealer):

This notice is sent to you as notification that SunnyBrook RV, Inc. has decided that a defect, which relates to vehicle safety, exists in certain 33RKFS fifth wheels produced from July 22, 1996 through May 15, 1997. The possibility of structural failure may occur with overloading, extensive use, added hitch weight and/or road unevenness. In every incident of related failure, stress on the front C-channel has caused hitch pin box crowning or stress fractures, which may cause the upper frame to drop down more than an inch when connected to the tow vehicle. As of this date, SunnyBrook RV, Inc. has not had a failure occur that has posed a safety risk nor damage to property other than the fifth wheel.

The service, required parts and transportation to authorized service centers will be provided free of charge.

To correct this condition, SunnyBrook RV, Inc. or authorized representatives will add a 2" x 3" x 86" 11 gauge steel tube to the existing front cross-member and inspect all welds, joints and structure of the upper frame decking for any related damage to your 33RKFS fifth wheel.

The work will take about 8 hours to complete. However, additional time may be required depending on appointment scheduling, transportation and inspection results. Contact Brian Philley at (574) 825-5250 Ext. 18 for additional information.

If SunnyBrook RV, Inc. or their authorized representative fails or is unable to remedy this defect without charge and within a reasonable time, the consumer may submit a written complaint to the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, SW, Washington, DC 20590, or call the toll-free Auto Safety Hotline at 1-888-327-4236.

Sincerely Yours,

SunnyBrook RV, Inc.

(Date)

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(Customer Name)
(Customer Address)

Dear Customer:

This notice is being sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. SunnyBrook RV, Inc. has decided that a defect, which relates to vehicle safety, exists in certain 33RKFS fifth wheels produced from July 22, 1996 through May 15, 1997. The possibility of structural failure may occur with overloading, extensive use, added hitch weight and/or road unevenness. In every incident of related failure, stress on the front C-channel has caused hitch pin box crowning or stress fractures, which may cause the upper frame to drop down more than an inch when connected to the tow vehicle. As of this date, SunnyBrook RV, Inc. has not had a failure occur that has posed a safety risk nor damage to property other than the fifth wheel. Our research indicates that you own the following 33RKFS fifth wheel that would be included in this campaign:

VIN# XXXXXXXXXXXXXXXXXXXX

For this reason we ask that you return the enclosed acceptance/waiver notification in the return envelope provided so that we can schedule an inspection and correction to your fifth wheel without delay or record your election to waive the option to inspect your fifth wheel because it is stationary or no longer owned by you. The service, required parts and transportation to the authorized service center will be provided free of charge.

To correct this condition, SunnyBrook RV, Inc. or its authorized representatives will add a 2" x 3" x 86" 11 gauge steel tube to the existing front cross-member and inspect/repair all welds, joints and structure of the upper frame decking for any related damage to your 33RKFS fifth wheel.

The work will take about 8 hours to complete. However, additional time may be required depending on appointment scheduling, transportation and inspection results. To obtain this free service, return the enclosed acceptance/waiver notification in the return envelope or contact Brian Philley at your earliest convenience at (574) 825-5250 Ext. 18 for inspection and correction. If you no longer own this vehicle, please inform us of this.

Federal Regulations require any lessor receiving this letter to forward it to the lessee within 10 days.

You may be eligible to receive reimbursement for the cost of obtaining a pre-notification remedy of a problem associated with this recall. For more information contact Brian Philley at (574) 825-5250 Ext. 18 or by email at bphilley@sunnybrookrv.com.

We regret any inconvenience that this action may cause you. However, we are concerned about your safety. If SunnyBrook RV, Inc. or their authorized representative fails or is unable to remedy this defect without charge and within a reasonable time, you may submit a written complaint to the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, SW, Washington, DC 20590, or call the toll-free Auto Safety Hotline at 1-888-327-4236.

Thank you for your patience and support in helping us to keep you safe.

Sincerely Yours,

SunnyBrook RV, Inc.