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May 25, 2004

**VIA FACSIMILE AND  
CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, DC 20590

National Highway Traffic Safety Administration  
Attention: Office of Defects Investigation  
400 Seventh Street, S.W.  
Washington, DC 20590

Re: Four Winds International Corporation Recall  
Defect and Non-Compliance Report

Gentlemen:

Our office is general counsel for Four Winds International Corporation ("Four Winds"), which is located in Elkhart, Indiana. On behalf of Four Winds, we are hereby notifying the National Highway Traffic Safety Administration of a defect in certain Class A motorhomes which has been determined by Four Winds to be safety related.

**A. Manufacturer, Identification of Vehicles, Recall Population.**

The manufacturer is Four Winds International Corporation, 701 County Road 15, P. O. Box 1486, Elkhart, Indiana 46515-1486. Four Winds has determined that a defect may be present on certain 2004 model year Class A Hurricane, Windsport and Infinity motorhomes. The total number of motorhomes subject to this recall campaign has been determined to be 240. However, there is a possibility that some of these 240 motorhomes may not contain the suspected defect. At this time, Four Winds is continuing its investigation to determine the exact number of motorhomes that will be subject to this recall campaign. Once this investigation is completed, Four Winds will provide NHTSA with beginning and ending dates on which the motorhomes subject to this recall campaign were manufactured.

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(3 pages)

The number of motorhomes subject to the recall campaign will include all motorhomes located on the premises of Four Winds that were produced before the defect was discovered and all motorhomes retail sold or currently located on dealer lots. The information available to Four Winds indicates that 100% of the motorhomes subject to the recall campaign will contain the defect.

**B. Description of Defect.**

The defect identified by Four Winds involves the location of the gasoline fuel lines on certain 2004 model year Class A motorhomes that were manufactured on a Workhorse chassis. The location of the fuel line on the chassis could cause the fuel line to chafe against the steel floor structure of the unit built on the chassis. The chafing of the fuel line may cause the fuel line to rupture, resulting in a fire that may lead to property damage to the motorhome and to personal injury to the occupants of the motorhome.

**C. Determination of Defect.** The principal events that have been the basis for the determination by Four Winds that the defect involving the location of the gasoline fuel line was safety related are as follows. On May 19, 2004, Four Winds' technical service department was notified by one of its dealers that a fuel line failure existed on one of its Class A motorhomes. Upon receipt of this notification, Four Winds inspected a Class A motorhome being manufactured on its factory floor in an effort to determine the cause of the fuel line failure. Based upon this inspection, Four Winds determined that the location of the fuel line in relation to the steel floor structure of the unit being built on the Workhorse chassis could result in the chafing of the fuel line.

Four Winds then began to research the scope of the defect involving the location of the fuel lines and determined that the defect only involves certain 2004 model year Class A motorhomes that were manufactured on a Workhorse chassis. At this time, Four Winds is continuing to investigate whether all of the potential 240 motorhomes should be subject to this recall campaign. Once Four Winds determines the exact number of motorhomes that are actually subject to the recall campaign, Four Winds will notify NHTSA accordingly.

**D. Remedying of Defect.**

The program to be implemented by Four Winds to remedy the defect will include notification to all registered owners of the subject motorhomes, including but not limited to all dealers with such motorhomes in stock. The owners will be instructed to bring their motorhome to an authorized Four Winds' dealer or service center for repair. Four Winds' dealers and service centers will be provided written instructions identifying the defect and the repair procedures that will need to be undertaken. As will be set forth in the notification letter to be mailed to the registered owners, the defect will be corrected by Four Winds at no expense to the owner.

At the current time, the procedures for repairing the defect are still being developed. One possible repair being investigated involves the replacement of any fuel line damaged due to the chafing of the fuel line resulting from its location on the motorhome. In addition, Four Winds will reroute all fuel lines on the motorhomes subject to this recall campaign to prevent any future chafing of the fuel lines.

Four Winds is currently investigating the proper location to reroute the fuel lines so as to prevent any future chafing of the fuel lines. Four Winds expects to finalize the repair procedures in the near future. After the repair procedures have been finalized, Four Winds will notify NHTSA regarding the actual repair procedures chosen to remedy the defect. In addition, Four Winds will provide NHTSA with copies of the repair procedures that will be provided to its authorized dealers and service centers when such repair procedures have been finalized and are available.

**E. Owner Notification.**

The owner notification letter, postcard, and envelope will be submitted to NHTSA for review after Four Winds has finalized the repair procedures for the above-referenced defect. Four Winds will then mail the owner notification letters and postcards within thirty (30) days after approval of the recall procedures by NHTSA.

**F. Campaign Number.**

Four Winds has designated R030010 as its internal campaign number for this recall. However, in the notifications to the owners and to its authorized dealers and service centers, Four Winds will reference the recall campaign number assigned by NHTSA.

Please contact the undersigned at (937) 492-1271 if you have any questions after you have had an opportunity to review the enclosed information. Otherwise, our office will provide NHTSA with the updated documentation necessary to implement the recall campaign after the repair procedures have been finalized.

Thank you for your prompt attention to this matter.

Very truly yours,



Daniel A. Bensman

dja

cc: Four Winds International Corporation  
Mr. John M. Garmhausen