COUNTRY COACH

Mr. George Person
Chief, Recall Management Office
National Highway Traffic Safety Adm.
400 7th Street, S.W.
Washington, D.C. 20590

August 26, 2004

Dear Mr. Person:

Country Coach, Inc. has determined that forty (40) Model Year 2005 Affinity 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 tire inflation pressures for the front tires. 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 issue new Federal tire labels. This work will be performed at no cost to the owner.

If you should have any questions, please feel free to contact me at 541-998-3720 x136.

Sincerely,

Gary Dwyer

Gary Dwyer
Director, Quality Assurance and Compliance Administration
Country Coach Inc.

Enclosures (1) Noncompliance Information Report, 573

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 2005; Affinity motor home manufactured from March 2004 through July 2004
   VIN Range: 4U7D9FZ1351103600 – 4U7E9F1451104132
   Vehicle Type: MPV
   Bodystyle: Motor Home

   Model Year 2005; Magna motor homes manufactured from March 2004 through July 2004
   VIN Range: 4U7C9FZ1851103766 – 4U7C9FZ1251104139
   Vehicle Type: MPV
   Bodystyle: Motor Home

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

   A total of 40 motor homes are involved.

   Model Year 2005 – 7 Affinity motor homes are consumer owned.

   Model Year 2005 – 33 Magna motor homes are consumer owned.

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 and Affinity motor homes were erroneously assigned inadequate cold tire inflation pressures for the front tires. 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 erroneously assigned inadequate cold tire inflation pressures for the front tires on their Federal tire labels. Although the tires installed on these motor homes comply with S5.1.2 and S5.3.1 of FMVSS No. 120 the Federal tire labels are incorrect. 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 August 2004, while compiling information for a new production motor home list, it was discovered that the identified motor homes had been assigned an inadequate cold tire inflation pressure for the front tires. After discovering the inadequate cold tire inflation pressures, all subsequent Affinity and Magna Federal tire labels were reviewed and found to have been assigned the correct cold inflation pressure for the front tires. On August 19, 2004 it was decided a non-compliance existed.

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

Country Coach will issue replacement Federal tire labels reflecting the corrected cold tire inflation pressure for the front tires. The Front Axle Weight Rating (FAWR) of these motor homes is 18,000 lbs. The original Federal tire labels show a cold tire inflation pressure of 120 PSI that supports only 16,500 pounds of weight carrying capacity. The replacement Federal tire labels will have a cold tire inflation pressure of 130 PSI that will support 18,000 pounds. At the corrected cold tire inflation pressure of 130 PSI the weight carrying capacity of the tires meets the FAWR. The Federal tire labels will be provided at no cost to motor home owners. The labor required to remove and replace the Federal tire label is not expected to exceed one-quarter (1/4) hour.

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 September 10, 2004. All mailings will be by Certified Mail, Return Receipt Requested, and First Class Mail.