



A GVW Holdings Company

George H. Person
Chief, Recall Analysis Division
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Subject: EQ05-006

Dear Mr. Person:

This is in response to your letter of April 5, 2005 requesting information on the purchasers of the Workhorse Custom Chassis incomplete vehicles that included the defect identified in Recall Notice 04V-195. These incomplete vehicle chassis had defective instrument cluster panels.

In conversations between you and Jack Rice, our outside counsel, an extension of the time to reply was approved until April 29, 2005. It was also agreed between you and Mr. Rice that the dates of shipments would not be required at this time. These conversations were generated by the confusion created in the eyes of Workhorse Custom Chassis by the agency treating them as an equipment manufacturer.

Workhorse Custom Chassis is an incomplete vehicle manufacturer. An incomplete vehicle is defined in 49 C.F.R. Section 568.3 as: "Incomplete vehicle means an assemblage consisting, as a minimum, of frame and chassis structure, power train, steering system, suspension system, and braking system, to the extent that those systems are to be part of a completed vehicle, that requires further manufacturing operations, other than the addition of readily attachable components, such as mirrors or tire and rim assemblies, or minor finishing operations such as painting, to become a completed vehicle." The applicable regulations give deference regarding certain matters to vehicles manufactured in two or more stages. When a vehicle is manufactured in two or more stages, you will find an incomplete vehicle manufacturer, perhaps an intermediate manufacturer, and a final stage manufacturer. None of them should be treated as an equipment manufacturer.

Regarding recalls conducted under Part 573, Title 49 Code of Federal Regulations, vehicles manufactured in two or more stages have their own provision identifying who has responsibility for certain matters under the recall. Section 573.3(c) states that: "In the case of a defect or noncompliance decided to exist in a vehicle manufactured in two or more stages, compliance with Sections 573.6 and 573.7 by either the manufacturers of the incomplete vehicle or any subsequent manufacturer of the vehicle shall be compliance by all manufacturers." Consequently, as Workhorse Custom Chassis, the incomplete vehicle manufacturer, has agreed to perform the requirements of

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Sections 573.6 and 573.7, none of the final stage manufacturers needs to do either. In the case of an equipment manufacturer that provides defective equipment to more than one manufacturer, there are different requirements than what we have in this case. This is clearly not the case of an equipment manufacturer.

At the enclosed attachment, please find a list of the purchasers of the Workhorse Custom Chassis incomplete vehicles (which included the defective instrument cluster panels). Also included are the number of incomplete vehicles sold to each customer and additional information in those cases where it is not obvious.

Should you have any additional questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Bigg", with a stylized flourish at the end.

Dave Bigg

Workhorse Custom Chassis
(765) 964 2364

Workhorse Custom Chassis 04V-195 Customer list

4/25/2005

No. Chassis	bill-to name	bill-to addr1	bill-to city	state	bill-to zip
218	AIRSTREAM INC	419 WEST PIKE ST	JACKSON CENTER	OH	45334-972
3	ALASKA SALES AND SERVICE	1300 EAST 5TH AVE.	ANCHORAGE	AK	99501
4	ALED AUTO/TRUCK REPAIR INC.	538 MARTIN AVE. SUITE A	ROHNERT PARK	CA	94928
6	ALEX IRVINE MOTORS LIMITED	2655 LAWRENCE AVENUE	SCARBOROUGH	ON	M1P2S3
2	ALFA LEISURE, INC.	1619 S. CUCAMONDA AVE.	ONTARIO	CA	91761
1	AMERICAN CHEVROLET	4742 MC HENRY AVE.	MODESTO	CA	95356
1	American Custom Coach	1521 S. Vineyard Ave.	Ontario,	CA	91761
50	ANCIRA WINTON CHEVROLET CO	6111 BANDERA RD	SAN ANTONIO	TX	78238
1	ANDERSON MOTORS, INC	170 AMARAL STREET	EAST PROVINCE	RI	2915
1	ANNETTE GANASSI GMC OLDS	1750 RTE 8	PITTSBURGH	PA	15116-173
6	APPLE CHEVROLET	1200 LOUCKS ROAD	YORK	PA	17404
8	ARROW CHEVROLET	14640 S CICERO AVENUE	MIDLOTHIAN	IL	60445
2	ARTHUR GLICK TRUCK SALES, IN	PO BOX 349 EXIT 106-186	MONTICELLO	NY	12701
1	AUTOWAY CHEVROLET	1700 E HILLSBOROUGH AVE	TAMPA	FL	33680
12	BARLOW TRUCK CENTER	RT.130 AND FAIRVIEW STREET	DELRAN	NJ	8075
1	BARNES WHEATON COQUITLAM	1090 LOUGHEED HWY	COQUITLAM	BC	V3K 6G9
2	BENTZ AUTOMOTIVE GROUP	1038 PARK CIRCLE DRIVE	BROOKFIELD	MO	64628
2	BIG WEST TRUCK SALE & SVC	505 MENAUL NW	ALBUQUERQUE	NM	87107
3	BILL DELUCA CHEVROLET INC	112 BANK ROAD	HAVERHILL	MA	1832
4	BILL HEARD CHEVROLET	3615 N. MANCHESTER EXP WAY	COLUMBUS	GA	31908
1	BILL JACOBS CHEVROLET, INC	2001 WEST JEFFERSON	JOLIET	IL	60435
1	BOB FISH PONTIAC CADILLAC	2275 S. Main Street	WEST BEND	WI	53095
3	BOB HOOK CHEVROLET INC	4144 BARDSTOWN ROAD	LOUISVILLE	KY	40218
4	BOB MCDORMAN CHEVROLET, INC.	RT 33 & GENDER ROAD	CANAL WINCHESTE	OH	43110
2	BOB STALL CHEVROLET	7601 ALVARADO ROAD	LA MESA	CA	91941
7	BOSTICK GMC TRUCK CENTER	1368 JOSLYN AVE.	PONTIAC	MI	48340-206
1	BROWN - DAUB CHEVROLET	819 NAZARETH PIKE	NAZARETH	PA	18064
2	BURT CHEVROLET	5200 SOUTH BROADWAY	ENGLEWOOD	CO	80110-679
3	CAPITOL CITIES INTERNATIONAL	2629 SOLOMON ISLAND ROAD	EDGEWATER	MD	21037
3	CENTRAL TRUCK CENTER	3839 IRONWOOD PLACE	LANDOVER	MD	20785
1	CHAPDELAIN TRUCK CENTER, IN	199 MASSACHUSETTS AVE.	LUNENBURG	MA	01462-121
2	CHURNEY'S BODY WORKS, INC.	20660 AURORA ROAD	WARRENSVILLE HE	OH	44146
2	CINDY BROOKER CHEVROLET	847 S. MAIN STREET	WILDWOOD	FL	34785
4	CITADELLE CHEVROLET	89 KENNEDY ROAD	LEVIS	QC	G6V 6C8
109	CLI LLC DBA COACHMEN RV	69950 M-62	EDWARDSBURG	MI	49112
5	CLI LLC DBA COACHMEN RV GROU	423 N. MAIN ST.	MIDDLEBURY	IN	46540
304	COACHMEN RV COMPANY LLC	425 N. MAIN ST	MIDDLEBURY	IN	46540
2056	CREST CHEVROLET	909 W. 21ST STREET	SAN BERNADINO	CA	92402
2	CRISWELL CHEVROLET, INC	#N/A	#N/A	#N/A	#N/A
1	CURTIS DWORKEN CHEVROLET INC	5929 GEORGIA AVE	WASHINGTON	DC	0
5	CUSTOM SALES & SERVICE INC	#N/A	#N/A	#N/A	#N/A
1730	DAMON CORPORATION	52570 PAUL DR	ELKHART	IN	46514
37	DAVE SMITH PONTIAC BUICK GMC	911 WEST CHICAGO RD	STURGIS	MI	49081
2	DAVE'S TRUCK REPAIR, INC	1023 PAGE BOULEVARD	SPRINGFIELD	MA	1104
1	DEALER TERMINATED	2901 VESTAL ROAD	VESATAL	NY	13860
1	DEGEL TRUCK CENTER, INC.	5480 BROWN RD.	HAZELWOOD	MO	63042
2	DENNIS DILLON AUTO PARK & TK	2777 S. ORCHARD	BOISE	ID	83705
5	DOBLES CHEVROLET	1250 SOUTH WILLOW STREET	MANCHESTER	NH	3103
1	DOUBLE K TROLLEY	701 NORTH RAILROAD AVE	CRANDON	WI	54520
10	DSU-PETERBILT & GMC TRUCK	4810 NORTH BASIN AVENUE	PORTLAND	OR	97217-3597
1	ED RINKE CHEVROLET	PO BOX 3377	CENTER LINE	MI	48015-0377
13	ELDORADO NATIONAL	13900 SYCAMORE WAY	CHINO	CA	91710-701
3	EURO LINER LLC	4251 PINECREEK ROAD	ELKHART	IN	46516
2	FAIRWAY CHEVROLET	3100 E SAHARA AVENUE	LAS VEGAS	NV	89104
5	FLEET CARE INC	#N/A	#N/A	#N/A	#N/A
4375	FLEETWOOD MOTOR HOMES OF CA	5300 VIA RICARDO	RIVERSIDE	CA	92517
2947	FLEETWOOD PENNSYLVANIA	ROUTE 487 RFD #1	PAXINOS	PA	17860
13	Flounder Motor Homes of Call	8001 20th Street	Rubidoux,	CA	92509
231	FOREST RIVER	58277 STATE ROUTE 19 SOUTH	ELKHART	IN	46517
2	FOSTER'S TRUCK & TRAILER	REPAIR	COLUMBUS	OH	43228
507	FOUR WINDS INTERNATIONAL	55667 CR 15	ELKHART	IN	46516
7	FRIENDLY CHEVROLET CO.	PO BOX 7066	DALLAS	TX	75207
2	GALLS CHEVROLET	1601 LOMAS N.E.	ALBUQUERQUE	NM	87102
3	GARBER CHEVROLET	500 N. ORANGE AVE.	GREEN COVE SPRIN	FL	32043
114	GELCO CORPORATION	3 CAPITAL DRIVE	EDEN PRAIRIE	MN	55344-311
22	GEORGIA COMM VEHICLES, LLC	5860 RIVERVIEW ROAD	ATLANTA	GA	30126
1	GEORGIA COMMERCIAL VEHICLES	770 PICKENS INDUSTRIAL	MARIETTA	GA	30062
916	GEORGIE BOY MFG LLC	69950 M-62	EDWARDSBURG	MI	48112
2	GILCHRIST CHEVROLET INC.	6030 S. TACOMA WAY	TACOMA	WA	98409

1	GILLOGLY CHEVROLET, INC.	1777 UNION ROAD	WEST SENECA	NY	14224-209
2	GM VARNADO & SONS	7659 AIRLINE HWY	BATON ROUGE	LA	70814
1	GOLD KEY PONT BUICK 1984 LTD	19545 #10 HIGHWAY	SURREY	BC	V3S 6K1
2	GOOD GMC, INC.	4800 CLYDE PARK AVE S.W.	WYOMING	MI	49509-511
1	GRAFF CHEVROLET MOTORS	1405 EAST MAIN (U.S. 80)	GRAND PRAIRIE	TX	75053
1	GRAFF TRUCK CENTERS	3429 WOLF ROAD	SAGINAW	MI	48601
11	GREEN CHEVROLET	8017 NORTH KNOXVILLE	PEORIA	IL	61615
996	GULF STREAM COACH	503 S. OAKLAND	NAPPANEE	IN	46550-090
3	GUS PAULOS CHEVROLET	450 WEST 3500 SOUTH	WEST VALLEY CITY	UT	84120
1	HALL CHEVROLET	11011 W. NORTH AVENUE	WAUWATOSA	WI	53226
2	HALLADAY MOTORS INC.	2100 WESTLAND ROAD	CHEYENNE	WY	82011-332
3	HARBOR CHEVROLET	#N/A	#N/A	#N/A	#N/A
1	HARMON'S INC	470 WEST 100 NORTH	PROVO	UT	84601
10	HAROLD CHEVROLET	1601 SOUTHTOWN DRIVE	BLOOMINGTON	MN	55431-1470
11	HAWTHORNE CHEVROLET	1180 GOFFLE ROAD	HAWTHORNE	NJ	07506-202
3	HAYES TRUCK GROUP	8455 N. FREEWAY I-45	HOUSTON	TX	77091
5	HEDRICK'S HALLOWELL CHEV. CO	961 W. SHAW	CLOVIS	CA	93612
3	HT & T TRUCK CENTER	311-A PACIFIC STREET	HONOLULU	HI	96817
19	HUMBERVIEW TRUCKS	60 FIELD WAY ROAD	TORONTO	ON	M8Z3L2
25	HUNTINGTON CHEVROLET	370 OAKWOOD ROAD	HUNTINGTON STAT	NY	11748
14	HUSKY TRUCK CENTER	11222 EAST MARGINAL WAY S.	SEATTLE	WA	98168
1	ISUZU TRUCK OF OMAHA	6336	OMAHA	NE	68106
1	ITEN CHEVROLET	6701 BROOKLYN BLVD.	BROOKLYN CENTER	MN	55429-171
4	JACK CAULEY CHEVROLET	7020 ORCHARD LAKE ROAD	W BLOOMFIED	MI	48322
20	JAYCO, INC	10758 COUNTY RD 2 (PLANT 51)	MIDDLEBURY	IN	46540
35	JAYCO, INC.	903 S. MAIN ST.	MIDDLEBURY	IN	46540
2	JEFFERSON CHEVROLET COMPANY	2130 E JEFFERSON AVENUE	DETROIT	MI	48207-419
1	JERRY'S CHEVROLET	1940 EAST JOPPA ROAD	BALTIMORE	MD	21234
2	JOE BASIL CHEVROLET	5111 TRANSIT ROAD	DEPEW	NY	14043
6	JON HALL CHEVROLET	551 NOVA ROAD	DAYTONA BEACH	FL	32114
2	KELLE CHEVROLET	137 ALLAIRE ROAD	FARMINGDALE	NJ	7727
1	KING CADILLAC OLDSMOBILE GMC	1700 WEST EVANS STREET	FLORENCE	SC	29501
3	KING TRUCK CENTER	1408 SAND LAKE ROAD	ORLANDO	FL	32805
2	L.H. CHACE & SONS CHEVROLET	161 SOUTH MAIN STREET	MIDDLEBORO	MA	02348-182
6	LAFFERTY CHEVROLET	829 WEST ST. RD.	WARMINSTER	PA	18974
1	LIBERTY CHEVROLET	90 BAY STATE ROAD	WAKEFIELD	MA	01880-109
18	LOSADA AUTO TRUCK, INC.	PO BOX 3158	BAYAMON	P.R.	00960-315
14	LYNCH TRUCK CENTER	#N/A	#N/A	#N/A	#N/A
43	MAGARITY CHEVROLET	825 BETHLEHEM PIKE	FLOURTOWN	PA	19031
4	MARCOONE CHEVROLET - MIAMI	#N/A	#N/A	#N/A	#N/A
5	MARTY'S INC.	5 INDEPENDENCE MALL WAY	KINGSTON	MA	2364
10	MAURICE SOPP & SON	5753 PACIFIC BLVD.	HUNTINGTON PARK	CA	90255
3	McCORMICK MOTORS	1255 WEST MARKET	NAPPANEE	IN	46550-1798
2	MERIT CHEVROLET	2695 BROOKVIEW DRIVE	MAPLEWOOD	MN	55119
10	MIRAK CHEVROLET	1125 MASSACHUSETTS AVENUE	ARLINGTON	MA	2174
6	MIRAMAR PONTIAC GMC	6435 MIRAMAR ROAD	SAN DIEGO	CA	92121
1343	MONACO COACH	606 NELSONS PARKWAY	WAKARUSA	IN	46573
1380	MONACO COACH CORP	91320 Coburg Industrial Way	Coburg	OR	97408
1	MONTGOMERY CHEV	5325 PRESTON STREET	LOUISVILLE	KY	40233
2	MONUMENT CHEVROLET	3940 PASADENA FREEWAY	PASADENA	TX	77503
1	MORNING STAR MOBILITY INC	109 N. IOWA STREET	COLORADO SPRING	CO	80909
3	MURRAY CHEVROLET CO.	1980 EAST POWELL BLVD.	GRESHAM	OR	97080
18	NALLEY MOTOR TRUCKS	2560 MORELAND AVE	ATLANTA	GA	30315
1737	NEWMAR CORPORATION	355 N. DELAWARE ST.	NAPPANEE	IN	46550-0030
1	NORRIS PONTIAC-GMC	32 ROUTE 304	NANUET	NY	10954
6	PARKS CHEVROLET	6441 N. TRYON ST.	CHARLOTTE	NC	28258
4	POWER CHEVROLET OF EL MONTE	3333 SANTA ANITA AVE	ELMONTE	CA	91731
1	RED HOLMAN PONTIAC GMC	35300 FORD ROAD	WESTLAND	MI	48185
3	RENDEL'S GMC	139 E. VAN BUREN ST.	JOLIET	IL	60432
259	REXHALL IND	46147 SEVENTH ST WEST	LANCASTER	CA	93534-760
30	REYNOLDS BUICK GMC	345 NORTH CITRUS	WEST COVINA	CA	91791
5	RICK HENDRICK CHEVROLET	409 S. ROXBORO STREET	DURHAM	NC	27702
2	ROBERTSON'S GMC	2680 CRANBERRY HWY	WAREHAM	MA	02571-1040
1	RUSSELL CHEVROLET	6100 LANDERS ROAD	SHERWOOD	AR	72117
636	R-VISION, INC	2666 S. COUNTRY CLUB ROAD	WARSAW	IN	46580
15	RYDER TRUCK RENTAL	3444 WEST DIRECTOR'S ROW	SALT LAKE CITY	UT	84104
1	SALT LAKE VALLEY GMC TRUCK	725 WEST 3300 SOUTH	SALT LAKE CITY	UT	84165
3	SANDS MOTOR COMPANY INC	5418 N.W. GRAND AVENUE	GLENDAL	AZ	85301
1	SCRANTON MOTORS INC.	PO BOX 777	VERNON	CT	06060
4	SMEDLEY'S CHEVROLET SALES, I	850 W. NATIONAL ROAD	VANDALIA	OH	45377-051
1	SMOKY JENNINGS CHEVROLET	122-28 N. MAIN ST.	PALMYRA	IL	62674-0198
16	STANDARD TRUCK CENTER	1015 W. PERSHING	CHICAGO	IL	60609
1	STAR TRUCK SALES, INC	3020 S. CREYTS ROAD	LANSING	MI	48917
4	SUPERIOR CHEVROLET	260 WEST MITCHELL	CINCINNATI	OH	45232

1	SUTLIFF CHEVROLET	13TH PAXTON STREET	HARRISBURG	PA	17105
1	TERMINATED LABOIT INC	4290 E 5TH	COLUMBUS	OH	43219
1	TERMINATED/PARKS CHEVROLET	8441 N. TRYON ST.	CHARLOTTE	NC	28256
47	THORSON GMC BUICK	3456 E. COLORADO BLVD.	PASADENA	CA	91107-3803
1678	TIFFIN MOTOR HOMES	GOLDEN RD	RED BAY	AL	35582
1	TILLERY CHEVROLET	1400 US ROUTE 66 W	MORIARTY	NM	87035
16	TOM BANNEN CHEVROLET INC.	2340 GALLATIN PIKE NORTH	MADISON	TN	37115
2	TRANSWEST GMC TRUCKS	7911 E 96TH AVENUE	HENDERSON	CO	80640
1	TRI CO TRUCK & EQ SALES	1440 N. POWERLINE ROAD	POMPANO BEACH	FL	33069
121	TRIPLE E RECREATIONAL VEHICL	301 ROBLIN BLVD.	WINKLER	MANI	R6W-4C4
7	UNIVERSAL SPECIALTY VEHICLES	19052 HARVILL AVENUE	PERRIS	CA	92570
126	VAHE ENTERPRISES INC.	750 E SLAUSON AVE	LOS ANGELES	CA	90011
2	VERITRANS SPECIALTY VEHICLES	1110 DI DRIVE	ELKHART	IN	46514
2	VoMac Truck Sales & Svc. Inc	12242 Declaration Drive	New Haven	IN	46774
7	WESTERN TRUCK PARTS & EQUIP	1441 RICHARDS BLVD	SACRAMENTO	CA	95814
1	WESTFALL GMC TRUCK INC.	3915 NE RANDOLPH RD	KANSAS CITY	MO	64161
1	WHITE ALLEN CHEVROLET	442 N. MAIN STREET	DAYTON	OH	45405
9	WINK CHEVROLET	10700 FORD ROAD	DEARBORN	MI	48126
7669	WINNEBAGO INDUSTRIES INC	605 W CRYSTAL LAKE RD	FOREST CITY	IA	50436
1	WORKHORSE CUSTOM	29508 SOUTHFIELD ROAD	SOUTHFIELD	MI	48076
13	WORKHORSE CUSTOM CHASSIS	P O BOX 110	UNION CITY	IN	47390
1	WRIGHT PONTIAC BUICK GMC	ROUTE 51	BEAVER	PA	15009
8	YOUNG CHEVROLET	645 N MAIN STREET	LAYTON	UT	84041
6	YOUNG PONTIAC GMC	570 N MAIN STREET	LAYTON	UT	84041
2	Z FRANK CHEVROLET	6060 NORTH WESTERN	CHICAGO	IL	60659