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(11 Pages)

Form Approved: O.M.B. No. 2127-0004

2005 APR 26 P 1:40

OFFICE OF DEFECTS
INVESTIGATION

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Report¹

On Feb 9, 2005, We besto Products [MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. _____) exists 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 Reports.

Date this report was prepared 4-21-05

Furnish the manufacturer's identification code for this recall (if applicable): EQ 05-005

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.

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

Telephone Number: _____ Fax No.: _____

Name and Title of Person who prepared this report.

Debra S. Dodge
Warranty / Recalls

Travel Supreme
PO Box 610
Wakarusa, IN
46573

Signed: Debra S. Dodge

¹Each 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 Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5227 or by FAX at (202) 366-7882.

504-111-1181

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 for photographs as necessary to describe the vehicle), provide:

Make(s) Travel Supreme Model Years Involved 12/1/02-4/1/05 Model(s) All

Production Dates: Beginning 12/02 Ending 4/1/05

VIN Range: Beginning: 4TKMH38C30653

Ending: 4TKMH38C061484

Vehicle Type: Motor Home Body Style: All

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? 33%

II. Identify the Recall Population

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

| | | | | | |
|-------|-----|------|-------|--|-----|
| Model | All | Year | 02-05 | Number of Vehicles Potentially Involved | 450 |
|-------|-----|------|-------|--|-----|

Model Years included in this recall are 2002-2005.

Total Number Potentially Affected by the Recall: 450

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

33% of Vehicles between December 1, 2002-April 1, 2005.

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.

Production of all models began with #4TKMH38C30653.
The possibility of the defect was discovered and corrected in production on all units immediately after unit number 4TKMH40D061484.

Post-It Fax Note 7672

To Debbie
Company Travel Supreme
Location
Fax # 574-862-2625 Telephone #

No. of Pages 8 Today's Date 4/18/05
From Dean Jackson
Company Vehicle Systems Inc.
Location
Fax #
Original Disposition: Destroy Return Call for pickup



U.S. Department of Transportation
National Highway Traffic Safety Administration

MAR 22 2005

NVS-215bc
EQ05-005

Mr. Harold Enander
Vehicle Systems Inc.
15349 E. Highway 52
Fort Lupton, CO 80621

Dear Mr. Enander:

The Office of Defects Investigation, Recall Management Division (RMD) is conducting a review of defect notice 05B-015. This notice affects coolant heaters manufactured by Webasto Products North America, Inc. (Webasto). The DBW 2010 model coolant heater assembled with Webasto burner tube Part Number 303046/26533A is made out of a stainless steel material that is not to specification and could fail prematurely. The coolant heater could overheat, resulting in a fire.

According to information provided by Webasto, Vehicle Systems Inc. (VSI) was identified as an manufacturer whom purchased and/or was supplied some of these coolant heaters, and may have been notified by Webasto about the coolant heater. The purpose of this request is to ascertain the disposition of coolant heaters that were acquired by VSI and to identify any subsequent purchaser of VSI's products that may be motor vehicle manufacturers or whose products may have been supplied for inclusion in a new motor vehicle.

Federal Regulation 49 CFR Part 573, Defect and Noncompliance Reports, requires that a manufacturer of motor vehicles or replacement equipment furnish a report to the National Highway Traffic Safety Administration (NHTSA) about each defect in its products that it decides is related to motor vehicle safety or that fail to conform to a Federal Motor Vehicle Safety Standard. In the case of a defect or noncompliance decided to exist in



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888-DASH-2-DOT
888-827-4299

original equipment installed in the vehicles of more than one manufacturer, compliance with Part 573.6 is required of the equipment manufacturer as to the equipment item, and of each vehicle manufacturer as to the vehicles in which the equipment has been installed. As of this date, we have not received notification of the above-described defect from VSI.

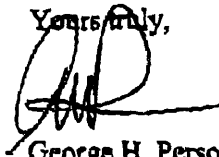
If VSI does not agree with the decision made by Webasto that the equipment contains a safety defect and could have been installed in VSI products, please provide an explanation for VSI's position. If VSI has not received any of this equipment, please so state. If VSI is not a vehicle manufacturer, please state the nature of its business and its relationship with Webasto. If VSI resold any of the equipment other than in its products, please identify the purchaser by name, sales, and quantity of VSI's products that contain this Webasto equipment.

This letter is being sent to VSI pursuant to 49 U.S.C. §30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. It constitutes a new request for information. VSI's failure to respond promptly and fully to this letter could subject VSI to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. If VSI believes that it should file a Defect and Noncompliance Report, a guide is enclosed to assist you.

VSI's response, in writing must be submitted to RMD by April 4, 2005, referencing BQ05-005, either by FAX, e-mail or any other method, which enables VSI to verify promptly that it was in fact received by RMD and the date it was received.

If you have any questions, please contact Mrs. Barbara E. Cooke of my staff at (202) 366-6098, by FAX at (202) 366-7882, Bcooke@nhtsa.dot.gov.

Yours truly,



George H. Person, Chief
Recall Management Division

Enclosures

Associate Administrator for Defect Investigations
National Highway Traffic and Safety Administration
United States Department of Transportation
400 Seventh Street, SW
Washington, D.C. 20590

RECEIVED
NVS-210

057-015 (12)

2005 FEB 16 A 7 51

OFFICE OF DEFECT INVESTIGATION

Re: 49 CFR Part 573 Defect and Non-compliance Report
Webasto model DBW 2010 coolant heater

Ladies and Gentlemen:

On February 9, 2005, Webasto Products North America ("Webasto") decided that a defect which relates to motor vehicle safety exists in terms of motor vehicle equipment identified below and is furnishing notification to the National Highway Traffic Safety Administration in accordance with Part 573 of Title 49 of the Code of Federal Regulations on Defect and Non-compliance Reports.

Date this report was prepared: February 15, 2005

1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Webasto Products North America, Inc.
15053 North Road
Fenton, Michigan 48430

The contact for purposes of this Notice is:

Gary R. Pierce, Vice President Operations & Product Services
15053 North Road
Fenton, Michigan 48430
Phone: (810) 593-6104
Fax: (810) 593-6105

Signed:


Gary R. Pierce, Vice President Operations & Product Services

I. Identify the Recalled Items of Equipment

1. Identify the Items of Equipment Involved in this Recall

Generic name of the item: coolant heater
Make: Webasto
Model: DEW 2010
Date of Manufacture: November 2002 to February 2005
Other Information: The diesel fuel powered heaters are installed by third parties in trucks, buses, motor coaches and marine applications. They can be used to heat engines or supply heat within the vehicle. This coolant heater incorporates the burner tube referenced below.

Generic name of the item: burner tube
Make: Webasto
Model: PN 30304026533A
Date of Manufacture: November 2002 to February 2005
Other Information: The stainless steel wall of the burner tube in some cases is made out of a material that is not to specification and in those cases could fail prematurely. The burner tube is sold as a service part for the above referenced coolant heater.

Identify manufacturers that purchase the components for use or installation in a new motor vehicle or a new item of motor vehicle equipment.

These products are sold to the manufacturers of new motor vehicles and motor vehicle equipment identified on the attached spreadsheet. OEMs are noted in the first column.

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.

100%

II. Identifying the Recall Population

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

The estimated number of burner tubes that will be subject to this recall is 1,400.

The estimated number of heaters that will be subject to the recall is 10,700.*

* Approximately 6000 of the heaters were sold to Vehicle Systems, Inc. unassembled.

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance:

Less than 10%.

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 items of equipment:

Webasto received notification from own customers that heaters manufactured in late 2002 and early 2004 had experienced accelerated deterioration of the wall of the burner tube. That condition occurred in walls that were 0.8 mm thick that were not within specification as to Nickel and Chromium content. Webasto has not received reports of this condition on burner tubes with a 1.0 mm wall thickness. Webasto has not documented out of specification steel on any 1.0 mm burner tubes. In November 2002, production of the burner tubes was relocated from Neubrandenburg, Germany to the Ukraine. The reported failures are on units manufactured about 1 year after production was transferred. Webasto has determined that failure in process controls occurred at the Ukraine production facility between November 2002 and the present. Webasto has determined that the substandard material was not available in Germany and that proper process controls were in place. Also, Webasto has not received reports of this condition in parts manufactured in Germany prior to November 2002.

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 walls of certain burner tubes, as previously described, are deteriorating at an accelerated rate and can fail. Lab test results indicate that the material composition of the stainless steel wall for these burner tubes was not within specification as to Chromium and Nickel.

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

Out of specification steel used in 0.8 mm tubes.

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

The failure of the burner tube could result in an increase in the temperature of the exhaust gas and a corresponding increase in the temperature of the exhaust system for the burner that could potentially ignite combustible materials in or around the vehicle.

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

An occupant may notice an increase in noise while the burners are operating. They may also observe heat related discoloration of components of exhaust system.

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

The burner tubes are supplied to Webasto Products North America by:

Webasto AG
Krailling Str. 9
82131 Stockdorf
Germany
Ph: 011-49-89-25794-317

A knowledgeable representative is Gary Pierce. (Contact information provided on page 1)

The burner tubes are fabricated by:

Webasto Elektron GmbH
Schewtschenko-Str. 115
79069 Lwiw/ Ukraine
Ph: 011-38-922-911564

A knowledgeable representative is Gary Pierce. (Contact information provided on page 1)

IV. Provide the Chronology in Determining the Defect/Noncompliance

6. With respect to a defect, furnish a chronological summary (including dates) of all the principal 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.

On January 24, 2005, Webasto received reports from two customers about the failures of burner tubes. One of the customers supplies heating systems for campers and motor coaches. The other sells coolant heaters for marine applications. Webasto received three such burner tubes for examination on or about January 28, 2005. Three burner tubes (one failed, one used but not failed and one new) were then sent to an outside laboratory to evaluate the composition of the burner tube walls. The results were received on February

4, 2005. The results suggest that the stainless steel may not have been within specification for Chromium and Nickel. Bench testing was conducted on February 9 to measure the exhaust temperature of a burner without the containment wall. The measured temperature on the surface of the exhaust tube where it attaches to the heater was 750°C. Sales were temporarily halted by Webasto until it was confirmed that present stock was in specification. Webasto has received no reports of fires, injuries or fatalities associated with these failures.

V. Identify the Remedy

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

OEM dealers and authorized Webasto dealers will replace the subject burner tubes with new certified burner tubes at no cost to the owner.

Webasto will also reimburse owners for pre-notification remedies not covered under manufacturer warranties as more specifically outlined in the attached Reimbursement Plan. Based on the production dates for the suspect burner tubes, Webasto believes that any such remedies would have been covered under the 2 year warranty on this product.

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

Certified new tubes will not deteriorate as compared to out-of-specification tubes.

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.

Webasto has alerted all existing inventories to remove all suspect burner tubes. Webasto has also verbally instructed its principal dealers to sort all existing inventories. All new production and distribution is of certified.

VI. Identify the Recall Schedule

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.

Webasto sells unassembled coolant heaters only to Vehicle Systems, Inc. Fully assembled heaters and service parts are sold to authorized independent dealers and distributors, to

OEMs or their affiliated parts distributors or their dealers. The independent distributors sell to fleets and school districts. A small percentage is sold to individuals for motor vehicle applications. Also as indicated previously.

Webasto has already verbally directed the sorting of existing inventories of burner tubes to stop distribution of suspect burner tubes. Webasto estimates that it will begin sending notifications to its customers, distributors and dealers within 10 days of this notice. The OEMs and VPI will then have to file Part 573 notices and notify their customers who are unknown to Webasto. Webasto will also have to acquire customer lists from its independent dealers and distributors to permit direct notification to those customers. Thus, Webasto cannot currently estimate when the notification process will be completed.

VII. Furnish Recall Communications

9. 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 exists, 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.

No written communications have been generated yet.

Note: These documents are to be submitted separately from those provided in accordance with Part 573.5 requirements.