



Newell Coach Corp.

P.O. Box 511 • N. Hwy 69 • Miami, OK 74355-0511
918-542-3344 • Fax: 918-542-7120

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2005 JUL 28 A 10:19

OFFICE OF 
DEFECTS INVESTIGATION

July 14, 2005

Kenneth N. Weinstein, Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh St., S.W. (NSA-01)
Washington, D. C. 20590

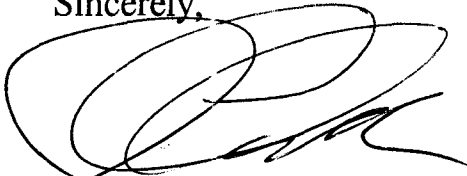
05V-339
(13 pages)

Re: Part 573 Notification to NHTSA by ZF Lenksysteme GMBH, Berlin
Germany dated June 10th 2005.

Dear Sir:

The enclosed Defect and Noncompliance Report is submitted pursuant to
federal Regulation 49 CFR Part 573, and per the above referenced
notification letter from ZF Lenksysteme of Berlin Germany (attached).

Sincerely,



John Clark
VP/Director for Service

Defect and Noncompliance Information Report
EQ05-005

July 14, 2005

Format Per Federal Regulation 49 CFR Part 573.5 (c)

1. Newell Coach Corporation, John Clark, VP Director for Service, PO Box 511, Miami OK 74355, 888 363 9355

2. Newell motor homes

All units produced from 06/24/04 to 03/09/05 (coach #'s 737-764)

3. 28 Coaches affected

4. .0017 percentage estimated to actually contain the defect

Recall population of motor homes was determined based on detailed shipping and receiving dates. Identified parts inventory level was at zero, at both start and end dates of the receipt of suspect parts.

5. Defect and Noncompliance Report from ZF Lenksysteme GMBH dated June 10th, attached

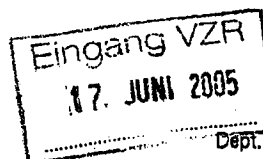
6. Determination was made by ZF Lenksysteme GMBH

7. Determination was made by ZF Lenksysteme GMBH

8. Attached (ZF)- ZF is still in process of developing a means to identify non-compliance parts.

9. Attached ZF notification letter

Ø Hr. Ranger



ZF Group NAO · 15811 Centennial Drive
Northville, MI 48167

Kenneth N. Weinstein, Associate Administrator
for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, S.W. (NSA-01)
Washington, D.C. 20590

Dept.

From

Phone

Fax

E-mail

Your Ref.

Our Ref.

Corporate

Beth Walker

734-207-2823

734-454-1063

elizabeth.walker@zf.com

Date

June 10, 2005

Part 573 Notification to NHTSA

Dear Mr. Weinstein,

On June 6th, 2005, ZF decided that a defect which relates to motor vehicle safety exits in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

573.6 (c)(1): Manufacturer's Name of the item of equipment

ZF Lenksysteme GmbH, plant Berlin, Lange Enden 1, 13437 Berlin, Germany

ZF Heavy Duty Steering Inc., 50 Harwill Road, St. Thomas ON N5P 4M6, Canada

Contact person for both:

Dave Peno,
Business Unit Manager - Steering Technology,
ZF Sales & Service North America, LLC
777 Hickory Hill Drive
Vernon Hills, IL 60061
Tel: 847-478-6754
Mobile: 847-997-0964
Fax: 847-478-6774

President: Julio Caspari
www.zf.com

ZF Group NAO
15811 Centennial Drive
Northville, MI 48167 · USA
Phone 1-734-416-6200
Fax 1-734-416-8331



573.6 (c)(2)(iii): Identification of Items of Motor Vehicle Equipment

Generic Name of item	Model
Shaft	I-Shaft

Supplier	Customer	Part number	Date of supply
ZF Lenksysteme	Newell Coach Cooperation	7025974718 7025974729	Mar 19, 2004 - Oct 04, 2004
ZF Lenksysteme	Freightliner LLC Portland	7025974743	Apr 20, 2004 - Jun 23, 2004
ZF Lenksysteme	Motor Coach Industries Winnipeg	7025974759 7025974765 7025974774 7025974775	Mar 24, 2004 - Aug 09, 2004
ZF Heavy Duty	Sterling Truck St. Thomas, Canada	7025974685	May 12, 2004 - Sep 09, 2004
ZF Heavy Duty	Freightliner Daimler Chrysler Vehiculos, Santiago, Mexico	7025974730 7025974731 7025974724 7025974726	May 11, 2004 - Aug 17, 2004 Apr 14, 2004 - Oct 13, 2004 Apr 20, 2004 - Oct 15, 2004 Apr 06, 2004 - Oct 15, 2004
ZF Heavy Duty	Freightliner Corp. Cleveland	7025974730 7025974731 7025974724 7025974703 7025974704	Apr 08, 2004 - Oct 13, 2004 Apr 06, 2004 - Oct 15, 2004 Apr 13, 2004 Apr 16, 2004 - Oct 01, 2004 Apr 19, 2004 - Oct 04, 2004
ZF Heavy Duty	Freightliner Corp. Portland	7025974730 7025974731 7025974732	Sep 16, 2004 Apr 14, 2004 - Oct 14, 2004 Apr 27, 2004 - Oct 15, 2004



Supplier	Customer	Part number	Date of supply
ZF Heavy Duty	Freightliner (FCCC), Gaffney	7025974741 7025974742 7025974752	Apr 20, 2004 - Oct 07, 2004 Apr 27, 2004 - Oct 18, 2004 Apr 06, 2004 - Oct 08, 2004
ZF Heavy Duty	Workhorse (Autocar LLC, Hagerstown)	7025974723	May 05, 2004 - Sep 29, 2004
ZF Heavy Duty	Workhorse Protoshop, Indiana	7025974723	Jul 30, 2004
ZF Heavy Duty	Trolley Boats Holly Hill	7025974723	May 13, 2004 - Aug 20, 2004
ZF Heavy Duty	Spartan Motors Inc, Charlotte	7025974744 7025974747	Apr 01, 2004 - Jul 30, 2004 Apr 13, 2004
ZF Heavy Duty	Motor Coach Industries Winnipeg	7025974759 7025974765	Jul 21, 2004 - Oct 13, 2004 Jul 21, 2004 - Oct 13, 2004

573.6 (c)(2)(v) Manufacturer that purchase the component

- Newell Coach Cooperation, North Highway 69, Miami OK 74355, USA
- Freightliner LLC Cooperate II Test Center, 4300 N. Commerce, 97217 Portland, OR, USA
- Motor Coach Industries, Fort Gary Warehouse, 1475 Clarence Av., Winnipeg, Manitoba R3T 1T5, Canada
- Sterling Truck, 350 South Edgeware Road, St. Thomas, Ontario, N5P 4C4, Canada



- Freightliner / Daimler Chrysler Vehiculos, Comerciales Mexico, KM 23.7, Location 065, Carretera, Lamarquesa, CP 52600 , Santiago, Mexico
- Freightliner Corp, 1150 Statesville Street, Cleveland, NC, 27013, USA
- Freightliner Corp, 6936 North Fathom Street, Portland, Oregon, 97217. USA
- Freightliner (FCCC), 552 Hyatt Street, Gaffney, SC, 29341, USA
- Workhorse (Autocar LLC, 551 East Main Street, Hagerstown Indiana, 47346, USA)
- Workhorse Protoshop, 2741 North Arba Pike, Union City, Indiana, 47390, USA
- Trolley Boats, 406 Walker Street, Holly Hill, Florida, 32117, USA
- Spartan Motors Inc, 1549 Mikesell Road, Charlotte, Michigan, 48813, USA

573.6 (c)(3): Total Number of Parts Containing the Defect

Supplier	Customer	Part number	Number of parts potentially involved
ZF Lenksysteme	Newell Coach Cooperation	7025974718	28
		7025974729	28
ZF Lenksysteme	Freightliner LLC Portland	7025974743	8
ZF Lenksysteme	Motor Coach Industries Winnipeg	7025974759	32
		7025974765	32
		7025974774	2
		7025974775	2
ZF Heavy Duty	Sterling Truck St. Thomas, Canada	7025974685	173
ZF Heavy Duty	Freightliner Daimler Chrysler	7025974730	300
		7025974731	3750



Supplier	Customer	Part number	Number of parts potentially involved
	Vehiculos, Santiago, Mexico	7025974724 7025974726	1190 999
ZF Heavy Duty	Freightliner Corp. Cleveland	7025974730 7025974731 7025974724 7025974703 7025974704	1000 26100 2 142 219
ZF Heavy Duty	Freightliner Corp. Portland	7025974730 7025974731 7025974732	50 1700 450
ZF Heavy Duty	Freightliner (FCCC), Gaffney	7025974741 7025974742 7025974752	1050 647 357
ZF Heavy Duty	Workhorse (Autocar LLC, Hagerstown)	7025974723	58
ZF Heavy Duty	Workhorse Protoshop, Indiana	7025974723	4
ZF Heavy Duty	Trolley Boats Holly Hill	7025974723	2
ZF Heavy Duty	Spartan Motors Inc, Charlotte	7025974744 7025974747	127 4
ZF Heavy Duty	Motor Coach Industries Winnipeg	7025974759 7025974765	156 156

573.6 (c)(4): Percentage of parts estimated to contain the defect

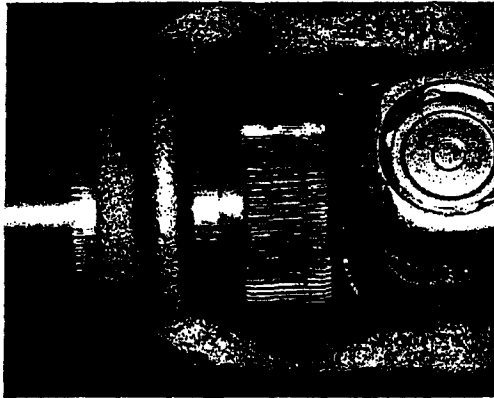
Approximately 52 ppm of the Parts (0.0052 %) identified pursuant to 573.6 (c) (3)



573.6 (c)(5): Description of the Defect

- Defect

The I-Shaft is the mechanical linkage between steering wheel and the steering gear. At the non welded side of the I-Shaft there is the universal joint. There are possibilities that the fork / shaft connection may get lost.



- Causes

Employee failure: The Fork was broached twice. Consequently the press fit connection between the Fork and the Shaft may get lost.

- Consequences

In case of fork / shaft connections get lost the steering ability of the vehicle gets lost.



- Any warning?

With increasing damage of the I-Shaft an increasing clearance at the steering wheel can be felt. This clearance can also be felt by shaking the I-Shaft manually (accessibility depending on mounting position in the vehicle).

- Supplier of the Defect component

Bohn Gesellschaft für mechanische Fertigung mbH, Motzener Straße 24, 12277 Berlin, Germany, Mr. Wolfgang Scheer

573.6 (c)(6) Chronology of all principal events

October 18th, 2004: 0-mileage failure at customer, corrective actions implemented

April 21st, 2005: Field failure / breakdown of a Highway tractor; no injuries

573.6 (c)(8)(i) Remedy Program:

Correction in Production line:

100% control of force and stroke during press fit connection fork / shaft, starting October 20th, 2004.

Field:

Verification of parts with special created tool (parts with less than 13kN pull-of force will be clearly identified as beyond specification and automatically destroyed).



573.6 (c)(8)(ii) Schedule

-Notification to the customers

Begin of notification: June 3rd 2005

End of notification: June 6th 2005

-Schedule for recall is not determined, yet.

573.6 (c)(9) Copy of all notices bulletins and communications

See attachment (presentation; notification letters to customers)

If you or your staff has any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Beth Walker".

Beth Walker

June 3, 2005

Mr. John Clark
National Service Manager
Newell Coach, Inc.
North Highway 69
Miami, OK 74354

Dear Mr. Clark:

The purpose of this covering letter and information packet is to officially notify Newell Coach, Inc. that ZF Lenksysteme is proposing a field action program dealing with I-Shaft assemblies produced for Newell Coach, Inc. between March 10, 2004 and October 20, 2004.

There is a possibility that the steering wheel could turn without engaging the steering gear, due to a possible production error on the I-Shaft assembly.

According to our records this is a total of 56 units based on your part numbers 102200 and 102210. Please see attached the shipment date and delivery note information.

This precautionary field action stems from a single (non-injury) incident in the field dealing with another vehicle OEM utilizing the same design I-Shaft. The other OEMs who are affected are currently being informed. The attached presentation clearly presents the history, findings, root cause analysis and recommended field program in more detail.

With such an incident, ZF Lenksysteme (Germany) will of course be officially notifying NHTSA / TREAD accordingly. However, in order to capture all necessary information for the Non-Compliance / Product Recall application, we need Newell Coach Assistance in completing some of the information as it relates to the vehicle manufacturer.

Attached you will also find a copy of this application. We are asking that Newell please fill in as much data as possible based on the data provided and return to my attention (via email) ASAP. We are sure you are aware of government time limitations in these matters.

At the moment we are preparing the NHTSA message. If you engage in correspondence with NHTSA first, please send immediate notification of this to my attention via telephone or email as presented below.

Based on our prior telephone communication is understood that you will be the main contact for dealing with this issue. It should be noted that I will be your primary contact dealing with this issue and you should always feel free to contact me if you have a question or concern. If you wish, I will prepare a meeting to discuss the further steps involved in this issue.

Upon receipt and review of this letter, presentation or TREAD application, please feel free to contact me.

Respectfully,

David E. Peno

David Peno
Business Unit Manager – Steering Technology
ZF Sales & Service North America, LLC
777 Hickory Hill Drive
Vernon Hills, IL 60061
Tel: 847-478-6754
Main: 847-478-6868
Mobile: 847-997-0964
Fax: 847-478-6774
Email: david.peno@zf.com

Attachment : (see next page)

(Shipment Date & Delivery Note Data)

<u>Customer P/N</u>	<u>ZFLS P/N</u>	<u>Delivery Note</u>	<u>Qty</u>	<u>Date</u>
102200	7025974718	86846641	4	3/19/2004
		86846642	4	3/19/2004
		86847948	4	4/15/2004
		86851141	4	6/11/2004
		86853913	3	7/30/2004
		86855303	1	8/27/2004
		86855304	4	8/27/2004
102210	7025974729	86857355	4	10/4/2004
		86846641	4	3/19/2004
		86846642	4	3/19/2004
		86847948	4	4/15/2004
		86851141	4	6/11/2004
		86853913	4	7/30/2004
		86855304	4	8/27/2004
		86857355	4	10/4/2004