



In Pursuit of Excellence

October 14, 2005

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

RE: Part 573 Defect and Noncompliance Notification from
Viking Recreational Vehicles, LLC dated August 18, 2005.

Dear Mr. Person:

This correspondence is to serve as our notification to NHTSA pertaining to a potential safety defect that exists in certain camper trailers manufactured by Viking Recreational Vehicles, LLC. (Viking). As the manufacturer of the lift system it is our opinion that the proposed recall procedures suggested by Viking will not eliminate all causes of failure.

DESCRIPTION OF DEFECT:

After extensive testing we have concluded that the Innovative Design Technologies, LLC. (I.D.T.) lift system is not defective. However, evidence has suggested that serious errors in Viking's installation process could result in compromising the functionality of our lift system. Some of which are:

- Add on components, engineered by Viking, used to raise the location of the crank mechanism may cause severe flexing and torque. This is occurring in the rear wall of the camper at the location of the crank mechanism, and the rear bumper at the driveshaft. This flexing and additional torque could result in damage to the functionality of our lift system.
- The driveshaft that connects from the main tube of the lift system out to the bumper of the camper is severely hindered. This is caused by the hole in the frame for pass-through not being properly located, causing a bow affect along with binding, flexing and rubbing. This can result in excessive torque to the lift system, abnormal rotational movement, and misalignment of internal components.
- Additional issues have been caused by the hardware Viking used for installation of the lift system. The hardware was not always that which was specified necessary for the application, resulting in the heads of screws popping off, which may cause any corner of the roof to collapse.

➤ Although Viking was instructed of the necessity of four mounting points in installation of the main tube assembly of the lift system, we found numerous instances where only two locations were used. Both points were placed on one side leaving the opposite side unsecured. This will cause flex in one direction and may lead to malfunction.

➤ Also regarding the shaft/collar/dowel pin concern, extensive testing performed by I.D.T., Viking and Coachman, once again, has proven that under normal use and proper installation, our lift system will function properly. It should be noted that we are aware of cases in which components of the lift system were subjected to abuse during installation, which could cause misalignment of parts and/or damage to the dowel pin.

PROPER RESOLUTION FOR SAFETY CONCERNS:

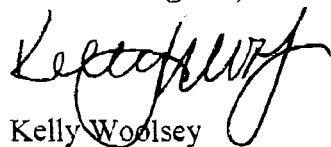
Due to the installation errors, harmful effects from add-on components and potential abuse to the lift system, there is no other remedy but to replace the main tube assembly as Viking stated in their "Preclusion of Defect". Internal components have been redesigned to protect it from consequential damage to the brake mechanism and the shaft/collar/dowel pin and still operate properly. This redesign was tested by I.D.T., Viking and Coachman and deemed satisfactory and acceptable to address the concerns by all parties.

It is also necessary to inspect for installation errors, and rectify those errors if present, due to the risk of future damages they may cause. Vikings plans to install an exterior secondary brake mechanism will not protect consumers against the possibility of the shaft/collar/dowel pin being damaged. Viking's proposed recall procedure does not safeguard against all causes for failure, therefore is not in the best interest of consumers, in our opinion.

Please refer to the attached documents. One is the letter sent to NHTSA from Viking RV. The other is a document sent from Viking RV to all dealers. There appear to be inconsistencies in the content of these two documents. Also attached, please find our letter sent to Viking RV dealers and Viking explaining our position, and offering a better solution.

Should you have any questions or need additional information, please do not hesitate to contact me at (574)522-6555.

With best regards,



Kelly Woolsey
Vice President

cc: Patricia Wallace, NHTSA Recall Mgmt. Team

Enclosures

August 18, 2005

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

Re: Part 573 Defect and Noncompliance Notification: Innovative Design Technologies, Inc.
Roof Lift Systems installed on Viking Recreational Vehicles, LLC camper trailers.

Dear Mr. Person:

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, this correspondence is to serve as our notification to NHTSA of a potential safety defect that exists in certain camper trailers manufactured by Viking Recreational Vehicles, LLC (Viking).

DESCRIPTION OF DEFECT:

On these units, the Innovative Design Technologies, Inc. ("IDT") roof lift system is defective and may fail allowing the roof to collapse unexpectedly. The roof on these tent style camper trailers is lifted by a mechanism manufactured by IDT that uses a gear and paw locking system to keep the roof structure raised. This gear turns a shaft that is connected to it through a collar and held in place with a dowel pin. Each corner of the roof is simultaneously raised when this shaft rotates. We have identified two causes of failure. First, slippage may occur between the gear and paw. When this occurs, there is no mechanical resistance keeping the roof raised and it collapses. The second failure cause relates to the shaft/collar/dowel pin. If the dowel pin shears, the shaft is free to rotate and the roof collapses. Should either one of these failures occur, there is the potential for personal injury to any occupants inside the trailer at the time of failure.

SCOPE OF DEFECT:

Viking installed these lift systems on our Model Year 2004, 2005 and 2006 Viking Epic, Viking Saga, Viking Legend, Coachmen Clipper Sport, Coachmen Clipper Spirit, Coachmen Clipper Classic, and Coachmen Futura camper trailers manufactured between November 2004 and August 15, 2005. A total of (3624) units are affected.

DISCOVERY OF DEFECT:

Viking investigated a complaint from a dealer regarding a roof collapse on or about June 29, 2005. Upon receiving the complaint, Viking immediately repurchased all units from the dealer and ordered them transported back to the factory for investigation. The unit was tested, but the roof did not fall as described. After June 29, 2005, Viking requested other parts of approximately 13 IDT lift systems which caused a roof collapse from other dealers, dating back to April 30, 2005. The parts were examined, and the investigation was expedited, when an additional 5 complaints were received in July. On August 15, 2005, Viking determined that we indeed had a safety defect on this product.

PRECULSION OF DEFECT:

IDT is in the process of redesigning the lift mechanism to eliminate the potential for slippage. Once this redesign is complete and tested, replacement systems will be made available for existing products and the redesigned system will be installed on all new products going forward. It is expected that 100% of all units involved will require the repair.

Viking will supply the necessary instructions and replacement parts for remedying this defect. The repairs will be done by Viking dealers at no expense to the dealers or retail customers.

All purchasers and dealerships that receive these units with the potential defect will be advised by mail regarding this problem. A copy of our proposed owner notification letter is attached for review and approval. We will start the mailing campaign immediately upon receipt of your approval of this letter.

Should you have any additional questions or need additional information, please do not hesitate to contact me at (574) 825-8528.

Very Truly Yours,

Gary L. Duncan
Vice President, Engineering Services

CC: Mike Terlep
Rick Lavers
Gar Warlick



Dealer Service Bulletin

August 23, 2005

To: All Viking, Clipper, and Futura Dealers

Subject: IDT Lift System Product Safety Recall

By now you are well aware of the potential safety issue and resulting product recall that exists with certain 2004, 2005 and 2006 model folding trailers using the IDT Lift System. Gar, Connie, and I have spoken with many of you, and we realize the difficulties and challenges this situation presents, especially at this time of year. Please understand that we are dedicating every available resource to this issue to bring about a quick and effective solution.

I want to emphasize that this is a proactive, preventative action and that the number of system failures prompting this recall is not widespread. The known reported cases of mechanism failure total roughly 1.5% of the units produced with this system with only 0.2% resulting in a roof actually coming down. This recall action is being taken in the interest correcting the problem before a serious injury occurs.

The following is an update on where we stand:

- Key internal components in the system master tube brake mechanism have been redesigned and tested with the involvement of VRV staff and the Coachmen VP of Engineering.
 - Testing put these new parts under repeated cycles simulating over 20 years of use.
 - Additional testing was done under various load conditions to simulate loads from an air conditioner, bike rack, etc.
- Final testing is in process on third redesigned part that will provide redundant protection against a system failure.
- The fix for the effected units will be replacement of the lift system master tube.
 - This will come to you as a single kit with written instructions.
 - We will also be sending newly designed roof safety support posts to provide an additional safety mechanism.
- Full scale production will begin near the end of this week and replacement lift systems will be shipping at the beginning of the week of 8/29.
 - Additional information and a service bulletin will follow this communication.
- Our intention is to get some replacement systems out to as many dealers as possible to deal with hot issues first and cover all over the next several weeks. The priority will be as follows:

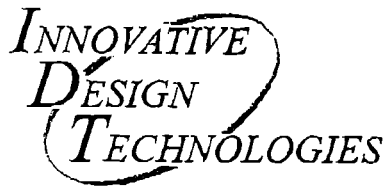
1. Emergency retail customer situations
 2. Dealer retail deliveries and rental units
 3. Dealer stock
 4. VRV pending shipments
 5. VRV yard inventory
- Attached is a copy of the letter being sent to owners of record of the effected units. Federal law in both the US and Canada require such notification, and the letters being sent meet the approval of NHTSA in the US and Transport Canada.
 - o The US version of the letter is attached. The Canadian version is nearly identical. In addition, there will be a French version of the Canadian letter sent to customers in Quebec.

We are committed to carrying this process through as quickly and smoothly as possible to ensure that you and our retail customers are protected. We appreciate your loyalty and support through this process, and we look forward to earning back your trust and confidence.

Best regards,



Jeffrey W. Koch
National Sales Manager



In Pursuit of Excellence

October 3, 2005

Viking Recreational Vehicles, LLC
P.O. Box 549
Centreville, MI 49032

RE: IDT Warranty

Recent inspections performed at numerous dealer locations, have revealed that 100% of those inspection sites have evidence of serious installation errors that could result in consequential damage to the functionality of our lift system. We had previously instructed your personnel that these errors could not be present on the campers and all had to be rectified prior to shipping or sale. We were assured by your management personnel over a year ago, that corrective measures were taken. Additionally, it appears that many systems were abused by improper installation practices and forcing of part. As per the warranty guidelines stated on our Limited Lifetime Warranty and our Product Return Policy, acknowledged by signature from your representative, we have no choice but to void all warranties due to these facts.

Also it is our understanding that your plans are to alter or modify our lift system. We do not approve of your plans for alteration or modification. Therefore, Innovative Design Technologies, LLC will not be liable for any subsequent claims of injury or damages using our lift system.

In the best interest of the dealers and consumers, we continue to stand ready to help if you will reconsider the path you have chosen.

Sincerely,

Michael Lambright
President

cc: Claire Skinner Gary Duncan
Mike Terlep Jeff Koch
Gar Warlick Connie Burkett
Sandra Kennedy



In Pursuit of Excellence

October 6, 2005

TO: All Viking, Coachmen Clipper & Futura Dealers

RE: Viking Recreational Vehicles, LLC Safety Recall

Dear Valued Dealers:

Being a small family run business and the manufacturer of the lift system on the units involved in Viking's recall we have become very frustrated with the course that Viking has chosen to take in this situation. We have put our heart into serving Viking and invested the majority of our resources into our relationship.

We are aware of untrue statements and allegations made by Viking and Coachmen R.V. toward our company and our lift system. Without placing blame on any party we want to enlighten you on the facts regarding the role that Innovative Design Technologies, LLC. (I.D.T.) had taken to avoid and remedy this situation. At Viking's request we had prototyped and extensively tested components required by Viking. The components were designed to allow for a variety of circumstances that could have consequential effects on our lift system and still operate properly. After approval of these components we were instructed by Viking and its parent company to begin production of these components which we immediately followed.

Unfortunately we could not accept responsibility for Viking's actions due to other circumstances and issues which, in our opinion, could compromise the functionality of our lift system. Subsequently, Viking stated that they would not be requiring our assistance.

We are disappointed with the actions and decisions that Viking has chosen to take on the remediation of this problem. Unfortunately this course will leave you and your consumers without the availability of replacement parts and the Lifetime Warranty as we originally supplied. However, I.D.T. is willing to produce and sell to the dealers a new lift system with the tested and approved components requested by Viking, approved by NHTSA, and with a full Limited Lifetime Warranty. We feel that this will serve to be a more prompt and beneficial course of action long term for you and your consumers.

We are prepared for immediate production. Orders will be filled first come first served. Obviously, we can not supply everybody's needs in 1 week but we can currently produce 300 – 400 units per week and will increase production depending upon the response we receive. Each unit will come with replacement instructions along with additional inspections and components to be installed to address the issues involved with the campers lift system installation.

For your convenience we have supplied an order form that you can use to place your order via facsimile. We will expedite all orders to get you selling again and your consumers camping again.

Best regards,

Michael Lambright
President

419 Roske Dr. • Elkhart, IN 46516 • Ph. (574)522-6555 Fax (574)522-6570