

FAULKNER, GARMHAUSEN, KEISTER & SHENK

A LEGAL PROFESSIONAL ASSOCIATION

HARRY N. FAULKNER
JOHN M. GARMHAUSEN
RALPH F. KEISTER
JAMES R. SHENK*
MICHAEL A. STAUDI
JAMES I. THOMAN**

THOMAS J. POTTS
DANIEL A. BENSMAN
BRYAN A. NIEMEYER
DAVID B. SHUFFELTON
JOHN M. DEEDS
JOSHUA A. KOLTAK

COURTVIEW CENTER-SUITE 300
100 SOUTH MAIN AVENUE
SIDNEY, OH 45365
(937) 492-1271
FAX: (937) 498-1306
www.fgks-law.com

SENDER'S E-MAIL
dbensman@fgks-law.com

*ALSO ADMITTED IN FLORIDA

**ALSO ADMITTED IN INDIANA

June 7, 2006

06 V-208
(10 pages)

**VIA FACSIMILE AND
CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. George H. Person
National Highway Traffic Safety Administration
Office of Defects Investigation
400 Seventh Street, S.W. NSA-11
Washington, DC 20590

Re: Thor California, Inc. Recall
Defect and Non-Compliance Report

Dear Mr. Person:

Our office is general counsel for Thor California, Inc. ("Thor California"), which is a manufacturer of travel trailers and fifth-wheel trailers. In accordance with 49 CFR Part 573, we are hereby notifying the National Highway Traffic Safety Administration that certain travel trailers and fifth-wheel trailers manufactured by Thor California may have a defect that has been determined to be safety related.

A. Manufacturer.

The manufacturer of the affected trailers is:

Thor California, Inc.
14255 Elsworth Street
Moreno Valley, California 92553-9013

NHTSA should contact the following individual with respect to this recall campaign:

Brad Williams
Director of Service
Thor California, Inc.
14255 Elsworth Street
Moreno Valley, California 92553-9013
(951) 697-4190
bwilliams@thorca.com

B. Recall Population.

Thor California has determined that a defect may be present on all Tahoe, Wanderer, Jazz, Vortex and Mirage travel trailers and fifth-wheel trailers manufactured during the period from February 1, 1996 through February 10, 2006, all of which were equipped with Suburban NT16, SF25, SF30 and SF35 furnaces or Atwood 8525-IV and 8535-IV furnaces. The total number of trailers that may contain the defect is approximately 64,000. Based upon the warranty records and other information available to Thor California, the defect described below has only occurred in isolated incidents. Although there have been no serious injuries or deaths that have occurred as a result of this defect, Thor California is initiating this recall campaign as a precautionary measure to ensure the safety of its customers.

C. Description of Defect.

On the trailers subject to this recall campaign, the potential defect involves the possibility that the furnace exhaust vent for the Suburban model furnaces and the Atwood model furnaces used on the trailers was not installed. The lack of the exhaust vent allows furnace combustion products containing carbon monoxide fumes to vent into the living space of the trailer rather than to the exterior of the trailer, which could result in serious injury or death to the occupants of the trailer. This potential risk arises only in the event that the furnace is in use.

D. Remedying of Defect.

The program to be implemented by Thor California to remedy the defect will include notification to all known registered owners of the subject trailers, included but not limited to all dealers with such trailers in stock. Owners will be instructed to visually check for the presence of the exhaust vent by observing two ports and the words "Suburban" or the letter "S" stamped on the surface of the metal exhaust plate located on the exterior sides or rear wall of the trailers. The existence of the ports and the stamped words are unique to the furnace installation and confirm that the furnace exhaust vent has been installed. In addition, the owners will be requested to feel for hot exhaust air escaping from the furnace exhaust vent when the furnace is in operation.

If the exhaust vent is not present or there are any other questions on the operation of the furnace, the owner will be instructed not to use the furnace and to take their trailer to the nearest authorized Thor California dealer or service center for repair. Thor California's authorized dealers and service centers will be provided written instructions identifying the potential defect and the repair procedure that will need to be undertaken. Thor California will, through its dealer service network, repair the defect as outlined in the attached Recall Service Bulletin, at no charge to the owner. A production quality

Mr. George Person
June 7, 2006
Page 3

assurance inspection procedure change has remedied the potential defect in subsequent production.

E. Owner and Dealer Notifications.

Enclosed as Exhibit "A" is a draft copy of the proposed notification letter to the registered owners of the trailers that is designated as the Safety Recall Notice. The Safety Recall Notice includes the Inspection Procedure for this recall campaign. Also enclosed as Exhibit "B" is a draft copy of the proposed notification letter to all Thor California dealers that is designated as the Recall Notice. Also enclosed as Exhibit "C" is a draft copy of the Recall Service Bulletin that will be sent to the dealers along with the Recall Notice, which summarizes the inspection procedures and the repair procedures to be implemented in connection with this recall campaign.

The enclosed documents are being submitted to NHTSA for your pre-review. Thor California intends to conduct the dealer notification campaign on June 23, 2006 and the owner notification campaign on June 30, 2006; provided that Thor California obtains NHTSA's final approval of the recall procedures referred to herein.

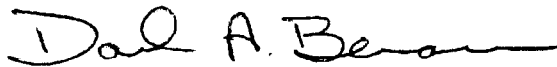
F. Campaign Number.

Thor California has assigned internal reference number 615001 for this recall campaign.

I would appreciate your providing me with a pre-review determination of the enclosed documents at your earliest convenience. Please contact the undersigned at (937) 492-1271 after you have had an opportunity to review the documents. I trust that you will find the enclosed documents comply with the NHTSA regulations and will approve the documents for form and content.

Thank you for your prompt attention to this matter.

Very truly yours,



Daniel A. Bensman

dja
Enclosures
cc: Thor California, Inc. w/encl (via e-mail)
John M. Garmhausen

THORCALIFORNIA

SAFETY RECALL NOTICE

RECALL CAMPAIGN No. 06V-_____

June 30, 2006

Dear Customer:

This **Safety Recall Notice** is sent to you in accordance with the requirements of the *National Traffic and Motor Vehicle Safety Act*, and is **critical to your safety**.

THOR California, Inc. has determined that a defect which relates to motor vehicle safety may exist in travel trailers and fifth-wheel trailers manufactured by THOR California between February 1, 1996 and February 10, 2006. According to our records, your trailer is in this group.

We have determined that these trailers may have a defect involving the installation of **Suburban furnace models NT16, SF25, SF30, and SF35; and Atwood furnace models 8525-IV and 8535-IV**. The defect involves **the lack of or the improper installation of the furnace exhaust vent** (sometimes referred to as a "chimney"). This improper installation or lack of the furnace exhaust vent will allow the furnace exhaust fumes containing combustion products, including high concentrations of **potentially lethal carbon monoxide gas**, to enter into the RV and **could result in injury or death to occupants of the trailer**.

Before you use your trailer again, it is **very important for your safety** to follow the simple **"Furnace Exhaust Vent Inspection Procedure"** included with this letter to assure the furnace exhaust vent is present and is properly installed on your trailer. *Until you perform this inspection and until the defect, if present, is corrected, do not use the furnace because the risk could be life-threatening when the furnace is in use.*

If you believe the defect is present on your RV, if you are not sure how to inspect the furnace exhaust vent, or you need assistance in getting the furnace exhaust vent installation inspected and corrected, contact THOR California immediately at (877) 870-2638 or via the Internet at <http://www.thorca.com>

To assure your safety, THOR California needs to know that you have completed the inspection of your RV.

To report your furnace vent is installed correctly, report a defect in your furnace vent or to ask for assistance, call (877) 870-2638 or via the Internet at <http://www.thorca.com>

If you take your RV to a dealer, the inspection or the repair of the defect will be done at no charge to you. If there is a defect present on your RV, the time to perform the repair will take less than 1.5 hours. However, your dealer may require you to leave your trailer for a longer period of time to allow scheduling at their facility.

You may also take your trailer to your selling dealer or any other authorized THOR California servicing dealer to have the inspection and repairs performed. Dealers and service centers have been informed of this recall and are prepared to perform it to your satisfaction. This recall will be performed at no cost to you.

THORCALIFORNIA Recall Notice

Recall Campaign No. 06V-_____

You should call your dealer or service center at your earliest convenience to schedule an appointment. When you take your trailer to the dealer, please bring this letter and your warranty/ownership documents with you. This will allow the dealer to prepare the necessary warranty forms most efficiently. Once the repairs are completed, please present the enclosed postcard to the repair facility for submission to THOR California.

If the defect referred to above has been repaired on your trailer before you received this recall notification, and if you incurred any direct cost in connection with obtaining such repair, you may seek reimbursement from THOR California. In order to obtain reimbursement, you must submit the following information: (1) *your name and mailing address*; (2) *the Vehicle Identification Number (VIN) for your trailer*; (3) *a reference to this recall campaign 06V-_____*; (4) *a copy of the receipt or invoice for the repair*.

This reimbursement may be obtained by sending your request for reimbursement along with the above information to:

*THOR California, Inc.
14255 Elsworth Street
Moreno Valley, CA 92553-9013
Recall Department: (877) 870-2638*

We have notified the National Highway Traffic Safety Administration of the recall and the procedures involved. However, should THOR California fail or be unable to correct the defect without charge, you may write to *Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, SW, Washington, DC 20590*, or call the toll-free Auto Safety Hotline at (888) 327-4236 (TTY: 1-800-424-9153) or <http://www.safercar.gov> on the Internet.

Federal regulations require that any vehicle lessor receiving this recall notice must forward a copy of this notice to the lessee within ten days.

We regret any inconvenience that this action may cause you. However, we are concerned about your safety. If you have questions concerning this recall or need assistance with the inspection procedure or the scheduling of the repair with a THOR California dealer, please contact the THOR California by phone at (877) 870-2638 or via the Internet <http://www.thorca.com>

Thank you for your patience and support in helping us to keep you safe. We appreciate your continued loyalty to and confidence in THOR California and our products. It is our goal to continue to provide you with high-quality, high-value products for your recreational experience.

Sincerely,

THOR California, Inc.

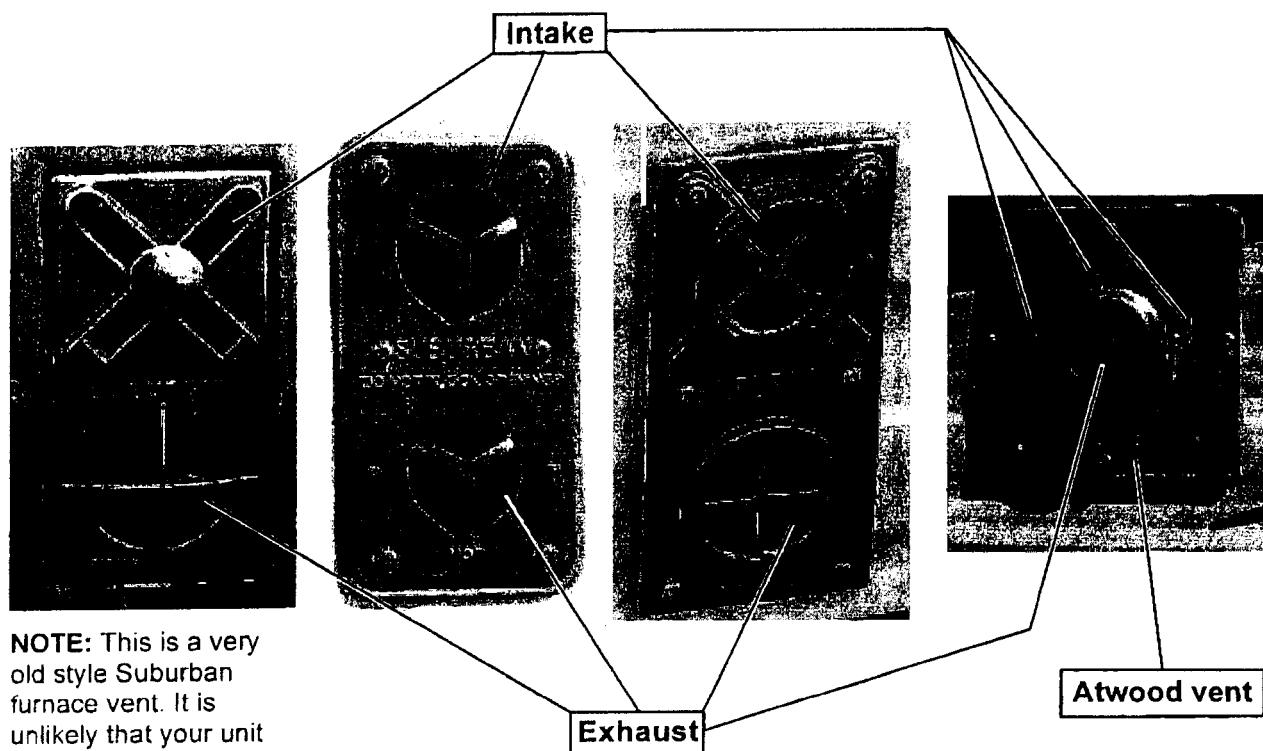
THOR California Furnace Vent Recall Inspection Procedure

Step 1: Locate the furnace exhaust vent.

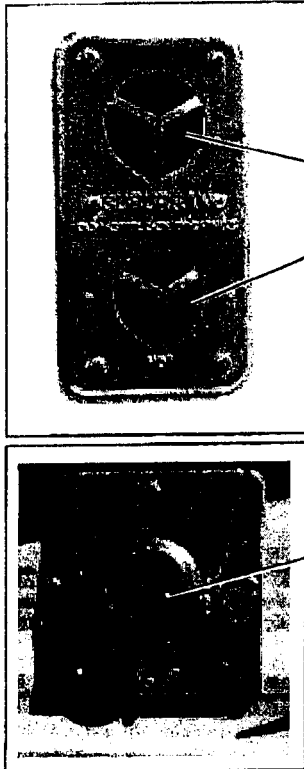
The pictures below show typical furnace exhaust vents located on the exterior side of an RV. To assist in locating the proper vent, check for the furnace location inside of your RV. The exhaust vent is just above floor height on an exterior wall directly outside the furnace. In many models, the vent is located below the refrigerator and on the same side as the entrance door ("door side"). However, some models are located on the side opposite the entrance door or "road side", or on the exterior rear wall, so please check both sides and the rear wall for the furnace exhaust vent location.

The vent consists of intake and exhaust ports on a metal plate. The word "**SUBURBAN**" or the letter "**S**" in raised or stamped letters may be on the surface of the metal exhaust plate. Note that Atwood models may not have any wording on the vent plate but would appear similar to the picture. Also, the size of the furnace exhaust vent may vary slightly with the furnace model used. However, the existence of the word "**SUBURBAN**" or the letter "**S**" positively confirms the presence of the Suburban furnace vent.

If you cannot find an exhaust vent that looks similar to one of the furnace exhaust vents in the pictures or if you are unsure whether the exhaust is correct or not, you must not use your furnace in the trailer. Contact THOR California Owner Relations Department immediately at (877) 870-2638 (toll-free) or via the Internet at <http://www.thorca.com> for assistance.



NOTE: This is a very old style Suburban furnace vent. It is unlikely that your unit will have this style, but check anyways.



Step 2: Inspect the furnace exhaust vent

NOTE: Before inspecting, be sure the furnace is not operating and is turned off. Once the furnace exhaust vent has been located, shine a light inside both ports to see if they appear to be continuous and clear of obstructions. The inside of the ports should look like tight fitting tubes that may have brackets welded across the inside. No openings or gaps should be observed on the sides of the tubes.

If the external vents appear to be correct, you can now turn on the furnace and check that the furnace exhaust vent is working properly and that hot exhaust air is escaping from one vent port. Be careful because **the exhaust gases are hot**. You should also feel a slight air flow into the furnace from the air intake vent.

If the furnace exhaust vent has not been installed, appears to be incorrectly installed, or the hot furnace exhaust is not properly escaping from the vent port, you must not use the furnace in your trailer. Contact THOR California Owner Relations Department immediately at the following:

By telephone at (877) 870-2638 (toll-free)

Via the Internet at <http://www.thorca.com>

You will need to take your trailer to your nearest THOR California approved dealer or directly to THOR California for repair or installation of the furnace exhaust vent.

Step 3: Report the results of your inspection. You may contact THOR California by either of the following ways:

1. Telephone: (877) 870-2638 (toll-free)

An automated telephone response system will take your information. Please follow the recorded instructions.

2. Website: <http://www.thorca.com>

An online form will collect your information. Please follow the online instructions.

It is very, very important that we talk with you if you suspect there is a problem or if you are not sure that the furnace vents are properly installed or are operating correctly.

The telephone number provided for this safety recall is toll-free in the United States and Canada. Please call the telephone number above to report the results of your inspection whether it is installed correctly or if you suspect a defect or need assistance.

THOR CALIFORNIA

RECALL NOTICE

RECALL CAMPAIGN No. 06V-____

Dear Dealer:

We have identified a group of travel trailers and fifth-wheel trailers that have a defect involving the installation of **Suburban furnace models NT16, SF25, SF30, and SF35; and Atwood furnace models 8525-IV and 8535-IV**. The defect involves **the lack of or the improper installation of the furnace exhaust vent**. This improper installation or lack of the furnace exhaust vent will allow the exhaust fumes containing combustion products, including high concentrations of **potentially lethal carbon monoxide gas**, to enter into the RV and **could result in injury or death to occupants of the trailer**. A Safety Recall procedure has been initiated. The enclosed Recall Service Bulletin #615001 details this procedure.

We have identified and contacted owners of units that are affected. A copy of that letter is also enclosed. We have instructed affected owners to contact you and schedule an appointment with your facility to have this recall performed. The recall is to be performed at no cost to the retail customer.

What We Are Asking You To Do

Please read and become familiar with the recall repair procedure, including the tools and parts required. You may receive calls from retail owners to schedule an appointment. Please schedule these appointments according to your work load and customer accommodation. Please call for authorization before performing the recall on any unit.

The *National Traffic and Motor Vehicle Safety Act* provides that each vehicle that is subject to a recall campaign of this type must be adequately repaired within a reasonable time after the owner has tendered it for repair. Generally, failure to repair within sixty (60) days after the owner's first delivery for repair is assumed to be an unreasonable delay.

All unsold trailers in your possession that are subject to this recall campaign must be held and inspected/repared in accordance with the service procedure of this campaign bulletin before owners can take possession of these trailers. It is a violation of Federal law to deliver to a consumer any vehicle covered by a recall campaign until the defect or noncompliance is remedied. Please service all trailers subject to this recall campaign at no charge to the owners, regardless of age or vehicle ownership, from this time forward.

You should contact owners of trailers recently sold from your vehicle inventory for which you have received the owner notification letter and make arrangements to perform the required service according to the instructions enclosed with this bulletin. At a minimum, mail the owner a copy of the owner notification letter accompanying this bulletin.

What THOR California Will Do

Since this recall is to be performed at no charge to the retail customer, THOR California, Inc. will reimburse you as outlined in the Recall Service Bulletin. If you have questions about this recall, or require further information or assistance, please contact THOR California Owner Relations Department at (888) 697-8467.

It is our goal that working with you we can continue to deliver a high level of customer support to our retail owners. You are an important part of our customer support team, and we appreciate your cooperation.

Sincerely,

THOR California, Inc.

THOR CALIFORNIA

RECALL SERVICE BULLETIN

THOR CALIFORNIA, INC.
14255 Elsworth Street
Moreno Valley, California 92553

Date: 23 June, 2006
Ref. #: 615001

Subject:**Furnace Vent Inspection and Repair****Application:**

All Tahoe, Wanderer, Jazz, Vortex, and Mirage units produced between February 1, 1996 and February 10, 2006

This bulletin describes the procedure to inspect units for the presence of and proper installation of furnace exhaust vents on all THOR California units.

1. Verify the presence of the correct furnace exhaust vent on the side of the unit. Furnace vents will be similar to those shown below.



Suburban vents



Atwood vent

2. If vent is present, verify that it is installed correctly. Check the interior of both ports of the vent. Check for obstructions and that the interior of the tubes is not cracked, split or otherwise damaged.
3. If the vent is not present, install a new vent assembly.

Warranty Labor Allowance:

Prior authorization is not required to inspect only.
Prior authorization is required to install furnace vent.
Call for authorization.

Flat Rate Code:

615001 Recall: Inspect furnace vent
615002 Recall: Install furnace vent