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August 30, 2007

VIA E-MAIL AND U.S. MAIL

**07V-418
(5 pages)**

George H. Person
Chief, Recall Management Division
Office of Defects Investigation Enforcement
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, D.C. 20590

RE: EQ06-019

Dear Mr. Person:

My firm represents LDV, Inc. ("LDV") and I am writing to respond to your August 20, 2007 letter regarding a defect in certain Dometic Corporation ("Dometic") refrigerators. LDV is a manufacturer of specialty vehicles for applications such as mobile sales, mobile medical testing, luxury travel, emergency response and homeland security. LDV sells directly to its customers.

Description of LDV Vehicles Potentially Containing Defective Refrigerators

LDV manufactures Mobile Command Centers, two of which have had the defective Dometic refrigerators installed in them. A Mobile Command Center is a high-tech vehicle combining the latest communications technology with ease of deployment and mobile operation.

Typical command vehicles are divided into three sections: a forward communications center, central access galley and rear command and conference room. The communications area features workstations that include a variety of radios, cellular, satellite and land-line telephones. The central galley area features a lavatory and basic amenities like a refrigerator, microwave, coffeemaker, and water supply. The command area is typically a conference room for top-level personnel, with room for up to eight emergency response professionals. It features flat screen monitors for viewing all incoming video and various recording systems for listening to or recording information.

Chronology of Events Involving the Determination of Defect and Communications with Dometic

The August 20, 2007 letter from NHTSA was the first notification to LDV that there was any defect in the Dometic refrigerators. Neither the August 28, 2006 report from Dometic (enclosed with your letter to LDV) nor any other previous communication from Dometic was

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received by LDV. Consequently, LDV had no role in the determination of defect in the refrigerators and, to date, has not received notice of the defect directly from Dometic. LDV has not received notice from either of the two purchasers of affected Mobile Command Centers that there has been a problem with the refrigerators.

LDV's Role in Distributing the Dometic Refrigerators

LDV received three (3) of the defective refrigerators from Dometic. One was returned to Dometic without being installed in a Mobile Command Center. The other two were installed in Mobile Command Centers sold to law enforcement agencies in California and Virginia. The two affected Mobile Command Centers were sold to:

Vallejo Police Dept.
111 Amador St.
P.O. Box 1031
Vallejo, CA 94590
Contact: (707) 648-4052
In Service Date: 10/30/99
VIN: 1HTMGABK6XA020472

Commonwealth of Virginia – Dept. of State Police
P.O. Box 27472
Richmond, VA 23261- 7472
Contact: (804) 674-2634
In Service Date: 6/30/00
VIN: 4UZA5FBA2YCG43683

With just two custom vehicles sold containing the Dometic refrigerators, it will be quite easy to contact the customers to notify them of the safety issue associated with the refrigerators. Nonetheless, a proposed schedule for conducting owner notification is attached, as requested. Please let me know if NHTSA wishes for LDV to file the six quarterly recall status reports required by 49 CFR § 573.7.

As requested in your August 20 letter, I have also enclosed a draft notification letter for these two purchasers, which LDV believes substantially complies with 49 CFR § 577.5, although the defect information is limited to the material provided with your letter and the remedy is simply listed as replacement, pending further information from Dometic. If NHTSA has approved customer notification language for Dometic based on additional information and investigation of the defect, my client will, of course, incorporate it into its letters.

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Please contact me at your earliest convenience so that LDV can notify the two law enforcement agencies to stop using the refrigerators.

Sincerely,

GODFREY & KAHN, S.C.



Josh Johanningmeier

JLJ:jgl

Encl.

cc: Bob Kawalec
Ric Willard

mn324574_1

LDV, Inc.

PROPOSED SCHEDULE

Owner Notification of Dometic Refrigerator Defect

a. Date on which search of current state motor vehicle registration records will be initiated in order to update the original owner list:

Owners of the two affected vehicles are already known.

b. Approximate date on which the revised owner list will be available to initiate owner notification:

Not applicable.

c. Approximate date on which owner notification will begin:

Immediately upon NHTSA approval of notification letter.

d. Approximate date on which owner notification will be completed:

Immediately upon NHTSA approval of notification letter.

e. Approximate date on which the dealer notification will be completed:

Not applicable.

DRAFT

Dear ____:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

LDV has learned that a defect which relates to motor vehicle safety exists in the Mobile Command Center you purchased from LDV on [DATE]. The defect is in the refrigerator installed in your Mobile Command Center, and is associated with the cooling unit at the back of the refrigerator cabinet.

The manufacturer of the refrigerator has determined that a fatigue crack may develop in the boiler tube in the area of the weld between the boiler tube and the heater pocket. If the fatigue crack develops, coolant solution may be released which could be ignited by the presence of an open flame, resulting in a fire. In order for the hazardous condition to develop, the following conditions must exist:

1. The refrigerator must be on and operating and the gas burning must be lit;
2. There must be an oversized heating element in the refrigerator;
3. The boiler tube must develop a fatigue crack of sufficient size to release coolant;
4. There must be a release of the coolant at a rate which will allow the accumulation of coolant at a concentration within its range of flammability; and
5. There must be an ignition source (gas flame) present.

If the Dometic refrigerator is still installed in your LDV Mobile Command Center, you should discontinue using it immediately and contact LDV regarding remedying the issue.

Sincerely,