



October 12, 2007

07V-491
(1 Pages)

Ms. Kathleen C. DeMeter, Director
Office of Defects
U.S. Department of Transportation
National Highway Traffic Safety Admin.
400 - 7th Street S.W.
Washington, DC 20590

Dear Ms. DeMeter:

Winnebago Industries, Inc. submits the following report pursuant to Part 573 of the NHTSA regulations. The numbered paragraphs below correspond to those found at Part 573.6(c).

1. Winnebago Industries, Inc.
605 W. Crystal Lake Road
Forest City, IA 50436
2. The motor vehicles that are noncompliant are certain 2007 and 2008 model year Itasca SunCruiser[®] and 2006, 2007, and 2008 model year Itasca Ellipse[®] motor homes. These motor homes were manufactured May 4, 2005 through October 3, 2007. The vehicles were identified using production records showing models and VINs.
3. The total number of noncompliant vehicles is 645.
4. It is estimated that 100 percent of the vehicles contain the defect.
5. Winnebago Industries, Inc. has decided the subject units are not in compliance with FMVSS 108 - lamps, reflective devices, and associated equipment. The rear red reflex reflectors on the Itasca SunCruiser models and both the rear and rear-side red reflex reflectors on the Ellipse models were located above the 60-inch height limit.
6. N/A
7. During a normal Quality analysis of production vehicles, the SunCruiser and Ellipse models were reviewed and measurements confirmed noncompliance with FMVSS 108. An analysis was performed to determine when the noncompliance began. It was determined that original design plans of these products were within conformance. However, as these product designs developed, designs were modified allowing the final product to have the subject reflectors above the 60-inch height limit.
8. Winnebago Industries, Inc. will remedy this situation by adding reflex reflectors in compliant locations. Winnebago Industries[®] will provide NHTSA with information identifying owner and dealer notification pending ordering and receiving of all required parts.
9. A copy of the dealer letter in draft form will be provided to NHTSA in a forthcoming letter.
10. A copy of the owner letter in draft form will be provided to NHTSA in a forthcoming letter.
11. The recall documents will carry the Winnebago Industries, Inc. Number 107.

Should you have questions regarding this information, please contact the undersigned.

Sincerely,

Ronald W. Post
Product Compliance Manager

e10-11c

Enclosure