



Since 1954

WELLS CARGO, INC.

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RECEIVED
2008 MAY 9 - 10:30 AM
OFFICE OF RECALL
MANAGEMENT DIVISION

08V-211
(16 Pages)

May 7, 2008

If you have any questions, please feel free to contact me at above information.

Sincerely,

Jeff Rebrovich
Purchasing Manager
Phone- 254-772-1740 Ext. 210
Email- jrebrovich@wellscargo.com

- Elkhart, IN
- Waycross, GA
- Waco, TX
- Ogden, UT
- Phoenix, AZ
- Carbondale, PA

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On April 16th, 2008, Wells Cargo [MFR] decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: 04/30/2008

Furnish the manufacturer's identification code for this recall (if applicable): _____

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Wells Cargo Inc. Texas Division

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

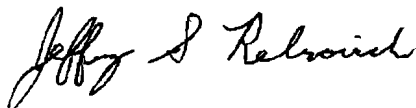
Jack Klepinger
Western Regional Manager

Telephone Number: 1-623-936-8150 Fax No.: 1-623-936-5808

Name and Title of Person who prepared this report.

Jeff Rebrovich
Purchasing Manager

Signed:



¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or by E-Mail to RMD.ODI@dot.gov.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): Wells Cargo Model Years Involved: 2004 Model(s): EW2624W-LQ

Production Dates: Beginning: 11-20-03 Ending: 11-20-03

VIN Range: Beginning: 1WC200M2142050465 Ending: 1WC200M2142050465

Vehicle Type: Utility Trailer Bodystyle: Bumper Pull

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Living quarters trailers containing two door refrigerators during time span of recall.

Make(s): _____ Model Years Involved: _____ Model(s): _____

Production Dates: Beginning: _____ Ending: _____

VIN Range: Beginning: _____ Ending: _____

Vehicle Type: _____ Bodystyle: _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): _____ Model Years Involved: _____ Model(s): _____

Production Dates: Beginning: _____ Ending: _____

VIN Range: Beginning: _____ Ending: _____

Vehicle Type: _____ Bodystyle: _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles manufactured during that time period. Less than 1%.

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Model	Year	Number of Vehicles Potentially Involved
EW2624W-LQ	2004	1

Total Number Potentially Affected by the Recall:

1

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

Refrigerator ordered for delivery 11-06-2003. Unit completed 11-20-2003. Only unit produced
with two door refrigerator with corresponding serial numbers to recall.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

See attached.

Describe the cause(s) of the defect or noncompliance condition.

See attached.

Describe the consequence(s) of the defect or noncompliance condition.

See attached.

Identify any warning which can (a) precede or (b) occur.

See attached.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Dometic Corporation

509 South Poplar Street

LaGrange, IN 46761

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Patrick McConnell, Director of Engineering

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims. Received letter dated 04-03-2008 from NHTSA ref NVS-215 RW, EQ06-019.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

N/A

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

Our remedy is to notify the owner of the defect in the vehicle and alert them of Dometics repair and reimbursement procedures via registered letter from Stericycle.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

We created secondary burning housing kit which seals off the potential safety hazard.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

Remedy component isolates the potential safety hazard, verses the original component which
Exposes the hazard.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

Only purchased one refrigerator which was contained in the recall identification and did not
purchase any others.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Working with recall firm Stericycle to notify last known owner of unit. Should be completed June
of 2008.

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

Upon completion of form 573 and assigned documentation Stericycle will create notice in which I will send for your approval.

Business Name
Address

Dear _____:

**IMPORTANT RECALL INFORMATION
PLEASE RESPOND IMMEDIATELY
RECALL CAMPAIGN NO. 06E-076**

I am writing to inform you of a recall campaign with respect to a potential safety-related defect in certain two-door refrigerator units manufactured by Dometic Corporation ("Dometic") between April 1997 and May 2003 and to advise you of what Dometic will do and what you should do with respect to this recall.

Dometic has created a program that minimizes the strain on your organization's resources and personnel, minimizes your administrative costs, and creates a closed-loop data flow. We have retained recall expert Stericycle Incorporated ("Stericycle") to conduct this campaign on behalf of original equipment manufacturers that used the affected refrigerators, all at Dometic's cost. Information regarding Stericycle is enclosed with this letter (Enclosure No. 1). Information regarding this election is set forth below.

Covered Products:

The following is a list of the specific model numbers of the refrigerators covered by this recall. Our records indicate that some of those refrigerators may have been installed as original equipment in recreational vehicles manufactured and sold by your company. See the serial number/value instruction sheet for information on location of serial numbers (Enclosure No. 2). **Please note that none of the refrigerators manufactured after May 2003 contain this defect.**

The refrigerators being recalled have one of the following model numbers as well as one of the following serial numbers:

Model Numbers:

NDR1062, RM2652, RM2662, RM2663, RM2852, RM2862,
RM3662, RM3663, RM3862, RM3863

Serial Numbers:

713xxxxx through 752xxxxx
801xxxxx through 852xxxxx
901xxxxx through 952xxxxx
001xxxxx through 052xxxxx
101xxxxx through 152xxxxx
201xxxxx through 252xxxxx
301xxxxx through 319xxxxx

Problem Description:

After some period of use, a fatigue crack may develop in the boiler tube of the covered refrigerators that may release a sufficient amount of pressurized coolant solution into an area where an ignition source may be present. If this were to occur under certain conditions, the coolant could ignite and result in a fire. On the basis of these facts, Dometic has determined that the refrigerators may contain a defect that relates to motor vehicle safety. We have notified the National Highway Traffic Safety Administration (NHTSA) of this determination, and we will be conducting a recall of the covered items pursuant to Campaign No. 06E-076. A copy of Dometic's report to NHTSA is enclosed (Enclosure No. 3).

What We Will Do:

Dometic will offer to provide owners of all covered refrigerators a rework for the potential defect at no charge for parts or labor. We have developed a rework, and the necessary parts should be available by early-April 2006. The rework consists of a secondary burner housing, a thermal fuse and a melt fuse. Information regarding data collection and payment for the rework is included with this letter (Enclosure No. 4). However, as explained below, we will need your assistance in identifying the current owners of the vehicles in question.

What You Need to Do:

First, in the unlikely event that you have any new vehicles equipped with the covered refrigerators in your inventory, you should not sell them until you have implemented the rework.

Pursuant to NHTSA regulations, 49 CFR 573.3(f), within five days of your receipt of this letter, you must submit a Defect Information Report to NHTSA covering all of the vehicles that you manufactured with one of the covered refrigerators as original equipment. This duty applies even though Dometic has already submitted its own Defect Information Report. For your convenience, we have enclosed a sample version of the required report and cover letter (Enclosure No. 5). If any of your vehicles with these refrigerators were sold in Canada, you should also submit a similar report to Transport Canada.

As the manufacturer of vehicles equipped with the potentially defective refrigerators, **you are also required to notify owners and purchasers of the affected refrigerators of the defect and to assure that they are provided with the opportunity to receive a free rework.** However, Dometic recognizes that product recalls can put a strain on an organization's resources and personnel, and that your company may not have much, or any, experience in conducting vehicle recalls. Therefore, as authorized by NHTSA Regulations, Dometic is offering – at no charge – to manage the administration of the forthcoming recall as it applies to the vehicles manufactured by each of our OEM customers. We recommend that you authorize Dometic to conduct the recall of your vehicles – including, but not limited to, the notification of vehicle owners, the implementation of the rework program, the maintenance of relevant records, and the reporting to NHTSA of the progress of the recall – by checking the appropriate box on the Election Form (Enclosure No. 6) enclosed with this letter and returning it to Stericycle, the firm that Dometic has employed to help it conduct this recall, no later than [REDACTED]. By authorizing Dometic/Stericycle to conduct the recall, you will not only not have to pay for what will be a large campaign, but you will also ensure a smooth flow of data collection

integral to the effective completion of the recall. Additional information is included on the Election Form on how Stericycle and Dometic will take care of the recall campaign for you.

Whether you elect to have Dometic conduct the recall, or you intend to conduct it yourself, you will need to provide Stericycle with a list of the vehicle identification numbers (VIN) of all of your vehicles equipped with the covered Dometic refrigerators, as well as a list of the names and address of the purchasers of those vehicles, organized by VIN. This information will enable Dometic to assure notification of all affected owners. Please provide the vehicle information electronically as an Excel or text delimited file. If you are not certain whether a particular vehicle was equipped with one of the recalled refrigerators, please include it on your list, since we would rather be over-inclusive than under-inclusive. **We assure you that this list will be used only for the purposes of this recall.** Please provide the list to Stericycle as soon as possible, but in any event no later than [REDACTED]. Even if you decide to conduct the recall yourself, please complete and return the Election Form to Stericycle, so we will know how you have decided to proceed.

Please note that regardless of which option you choose, you still are required to submit a Defect Information Report to NHTSA. If you have any questions about NHTSA requirements, you may contact Ms. Kelly Schuler of NHTSA's Recall Management Division at (202) 366-5227 or by e-mail at kelly.schuler@dot.gov.

If you have any other questions about this recall, please contact Brad Sargent at Dometic by telephone at (574) 294-2511, or by e-mail at brad.sargent@dometicusa.com.

We regret the inconvenience and effort that this recall will cause you. However, the safety of the users of our products is of paramount importance.

Sincerely,

NAME
TITLE

Enclosures:	Enclosure No. 1	Stericycle Information
	Enclosure No. 2	Serial Number/Value Instruction
	Enclosure No. 3	Copy of Dometic's Defect Information Report to NHTSA
	Enclosure No. 4	Information Regarding Data Collection and Payment for the Rework
	Enclosure No. 5	Sample of OEM Defect Information Report to NHTSA and Cover Letter
	Enclosure No. 6	Recall Management Election Form

BARNES & THORNBURG LLP

<http://www.btlaw.com>

Richard W. Paulen

Suite 200
121 West Franklin Street
Elkhart, IN 46516-3200

Switchboard: (574) 293-0681
Fax: (574) 296-2535

August 28, 2006

VIA CERTIFIED MAIL, Ret. Rec. Reg.

Ms. Maria Cino
Acting Secretary of Transportation
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC 20590

Re: Potential Defect Notification
Dometic Corporation

Dear Ms. Cino:

Please find enclosed a Notice of Potential Defect which I am forwarding on behalf of my client, Dometic Corporation ("Dometic") pursuant to 49 CFR, Part 573.6. Please contact either myself or Mr. McConnell, who is identified in the Notice if you have any questions or as you require further information.

Dometic's investigation is ongoing both as to the potential defect and possible remedies. As soon as additional information has been generated, we will provide it to the National Highway Traffic Safety Administration as required by applicable statutes and regulations.

Thank you for your consideration.

Respectfully,

BARNES & THORNBURG LLP

Richard W. Paulen

RWP/eaw
Enclosure

cc: Mr. Jon White, Chief, Defects and Recall Information Analysis Division, NHTSA, (w/enc.)
Mr. Patrick N. McConnell, Dometic Corporation (w/enc.) (via e-mail)
Mr. John Waters, Dometic Corporation (w/enc.) (via e-mail)
Mr. Kenth Bengtsson, Dometic Corporation (w/enc.) (via e-mail)
Mr. Hankan Skoglund, Dometic Corporation (w/enc.) (via e-mail)
Douglas K. Dieterly, Esq. (w/enc.) (via e-mail)

Chicago Elkhart Fort Wayne Grand Rapids Indianapolis South Bend Washington, D.C.
ELDS01 RWP 108311V1

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NOTIFICATION

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POTENTIAL DEFECT NOTIFICATION

Dometic Corporation ("Dometic"), a supplier of original equipment for the manufacturers of recreation vehicles has determined during the week of August 18, 2006 that a potential defect may exist in the items of motor vehicle equipment listed below. Dometic is submitting this notification of a potential defect to the National Transportation Safety Administration in accordance with the applicable provisions of 49 CFR Part 573.

Dometic Corporation is a Delaware corporation with its principal place of business at 2320 Industrial Parkway, Elkhart, Indiana 46515. The Dometic products affected by this notice were manufactured by Dometic AB, a Swedish company. The registered agent for Dometic Corporation and Dometic AB is Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.

The affected Dometic products which may contain the potential defect are two-door refrigerators manufactured between April 1997 and May of 2003. The potentially affected refrigerators have the model designations set forth below:

NDR1062
RM2652
RM2662
RM2663
RM2852
RM2862
RM3662
RM3663
RM3862
RM3863

The possibly affected units will have serial numbers beginning with the following digit combinations:

713xxxxx through 752xxxxx
801xxxxx through 852xxxxx
901xxxxx through 952xxxxx
001xxxxx through 052xxxxx
101xxxxx through 152xxxxx
201xxxxx through 252xxxxx
301xxxxx through 319xxxxx.

The potential defect is associated with cooling unit at the back of the refrigeration cabinet.

A fractional percentage of the potentially affected refrigerators have experienced a fatigue crack that may develop in the boiler tube in the area of the weld between the boiler tube and the heater pocket. A fatigue crack may release a sufficient amount of pressurized coolant solution into an area where an ignition source (gas flame) is present. Dometic's investigation has shown that a simulated release of cooling solution (refrigerant) in the area of the boiler, under certain conditions, could be ignited by the presence of an open flame. A boiler fatigue crack with the loss of cooling solution without ignition would result in a non-operational refrigerator that is not a safety issue. Under certain conditions, the released coolant could ignite and result in a fire. In order to have a fire, at a minimum, all of the following conditions must exist:

1. The refrigerator must be on and normally operating and gas burner must be lit;
2. There must be an oversized heating element in the refrigerator;
3. The boiler tube must develop a throughway fatigue crack of a specific size;
4. There must be a release of the cooling solution at a rate which will allow the accumulation of the cooling solution at a concentration within its range of flammability; and

5. There must be ignition source (gas flame) present.

If any of these conditions are not present, a release of the cooling solution will not result in a fire.

In April of 1997 Dometic modified the design of the affected refrigerators by increasing the wattage of the heating element from 325 watts to 354 watts. All production of the affected units from April 1997 through May of 2003 utilized the 354 watt heating element. In May of 2003, in order to improve the operating life of the refrigerators, Dometic returned to the use of the 325 watt heating element which it continues to use today. It is now believed that the use of the higher wattage heater contributed to abnormal fatigue in the boiler tube.

The products in question are all refrigerators used in the original manufacture of recreation vehicles or as replacement equipment for recreation vehicles. The total population of refrigerators potentially containing the defect is 926,877. Dometic estimates a potential maximum incident rate of 0.01% related to boiler fatigue cracks that leak and may result in a fire. There have been no incidents of injury or death related to the affected population of Dometic refrigerators.

Dometic became aware of the occurrence of fires which may have involved their products and retained an independent engineering testing laboratory to fully evaluate and investigate any potential defect in their refrigerators which might result in a fire. A number of returned units were analyzed and microscopic fatigue cracks which could release coolant into the area of the burner were identified in the boiler tube metal in the area of the weld between the heater pocket and boiler tube. Tests simulating the cracks were conducted the week of August 18, 2006 and confirmed a possible cause of fire in

the refrigerators under certain conditions. These test results prompted the preparation of this notice.

Dometic continues to gather information on the potential defect and will forward additional relevant information as it becomes available.

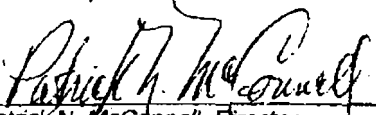
Dometic has not yet identified a proposed remedy for the potential defect. Dometic will continue a testing program designed to identify and evaluate possible remedies. This evaluation will take place both in the United States and in Sweden. Once a remedy has been identified, Dometic will initiate or participate in a remedy campaign initiated by the original equipment manufacturers and aftermarket suppliers who have purchased, sold, and distributed these products. A list of original equipment manufacturers and aftermarket suppliers to whom Dometic has sold the potentially defective refrigerators is being prepared and will be provided to the NHTSA upon its completion.

This notice was prepared by and inquiries should be sent to:

Mr. Patrick N. McConnell, Director
Engineering, Product Safety and Standards
Dometic Corporation
509 South Poplar Street
LaGrange, IN 46761
Phone: 260/463-2191
Fax: 260/463-4179

DATED this 28th day of August, 2006

Dometic Corporation

By: 
Patrick N. McConnell, Director
Engineering, Product Safety and Standards

ELI.DS01 RWP 198227v1