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March 12, 2009

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09V-091
(13 Pages)

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE.
Washington, DC 20590

Dear Sir or Madam:

My firm represents LDV, Inc. ("LDV"). 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. LDV has decided that a defect which relates to motor vehicle safety exists in certain items of motor vehicle equipment, which are listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573.

1. Corporate Name of Manufacturer.

LDV, Inc.
180 Industrial Drive
Burlington, WI 53105

LDV may be contacted through my firm and this report was prepared by counsel with the assistance of Steven Vasatko, Vice President of Operations and Business Development.

2-4. Identification of Items of Equipment Involved in this Recall, Total Number of Affected Items and Percentage of Units Affected.

The equipment involved includes 81 specialty vehicles manufactured by LDV for Snap-On Tools, used as Company Stores. The vehicles include models C5500, W-5 and F-650 chassis conversions built prior to March 6, 2009, all of which are identified by VIN, year, make, model, driver name and address in the spreadsheet attached at Tab A.

These vehicles represent 100 percent of the production of such models for the affected period and 100 percent of these units contain the defect. There are no other vehicle conversions by LDV which incorporate the same design feature at issue in this recall.

5. Description of Defect.

The Snap-On Company Store vehicle conversions have dedicated power for various accessory features. That system includes a battery isolator. As manufactured, there may be a cable installed on the battery isolator with the body of the cable lug facing the isolator. With all cables tightened down on the stud, this cable lug may be pressed against the cooling fins of the isolator, where contact (which cable insulation has been worn through) poses a risk of electrical short which could result in cables overheating. A copy of LDV's March 6, 2009 Service Bulletin, entitled Battery Isolator Installation, is attached at Tab B. The Service Bulletin includes instructions, photographs and schematics which describe this system and the potential problem, as well as corrective action necessary (and, for almost all units, already undertaken).

6. Chronological Summary Of Principle Events For Determining Defect.

LDV received a report from Snap-On of a W-5 model Company Store where an electrical fault caused wire insulation to melt, creating smoke and acrid odor. The incident took place on January 27, 2009 and is described in the March 10, 2009 Failure Report for Gutierrez Fire, attached at Tab C. Snap-On reported the incident to LDV and brought the vehicle in on January 27, 2009. This incident is the only one reported to LDV. On March 6, 2009, prior to completing the attached Failure Report, LDV decided that the cable installation was defective and it notified Snap-On and assisted Snap-On in notifying operators of the affected vehicles.

To date, there have been no other incidents, no injuries, no fatalities and no warranty claims associated with this defect, other than warranty repairs to the W-5 model Company Store involved in the January 27 incident.

8. Remedy.

LDV has identified a two-step remedy. The first step, already undertaken, is identified in the attached Service Bulletin and involves inspecting the cable installation to ensure all cables are installed with the lug body facing away from the isolator with none in contact with the cooling fins. The second step, which will be implemented as soon as possible, involves adding a grounding strap or cable to the aluminum box to properly ground it and the components mounted within it.

Recall Schedule

Snap-On was notified on March 6, 2009, and provided with the Service Bulletin. Snap-On Company Store vehicles are maintained and serviced by Snap-On service centers. The Service Bulletin has been performed on 76 units already (94% of total affected units). The second step will be conducted in the same service centers or by LDV personnel in the field by April 15, 2009.

LDV does not foresee any problems in implementing this recall, given the small number of units affected and the fact that they are all under the control of a single customer.

9. Recall Communications.

The Service Bulletin is attached. The second step will require another bulletin.

Once you have had a chance to review these materials, please contact me with questions and so that LDV can obtain approval of subsequent communications.

Sincerely,

GODFREY & KAHN, S.C.

Josh Johanningmeier

JLJ:ajp

3629655_1

TAB A

VIN	Year	Make	Model	Driver Name	City	State	Time Zone	Notes
J8BE5W16487	2009	CHEV	W5500			NH	est	Completed 3/10 with FS
1GBG5V1909F	2009	CHEV	C5500		DAYTON	OH	est	Working with SS to fix this week
1GBG5U1217F	2007	CHEV	C5500		SAINT FRANCIS	MN	cst	Working with SS to fix this week
1GBG5V1938F	2008	CHEV	C5500		HEPHZIBAH	GA	est	Complete 3/6 with DF; called 3/9 to confirm
J8BE5W16987	2008	CHEV	W5500		ABITA SPRINGS	LA	cst	Complete 3/6; rec'd email
3FRNF66Z18V	2008	FORD	F650		FAYETTEVILLE	PA	est	Completed 3/6 with BK
1GBG5V1979F	2009	CHEV	C5500		COUNCIL BLUFFS	IA	cst	Completed 3/6 with BK
3FRNF66CX8V	2008	FORD	F650		INDIANAPOLIS	IN	est	Completed 3/6 with BK
J8BE5W16887	2008	CHEV	W5500		NUNNELLY	TN	cst	Completed 3/6 with DF
J8BE5W16887	2008	CHEV	W5500		SAN ANTONIO	TX	cst	Completed 3/6 with DF
J8BE5W16787	2008	CHEV	W5500		WESTFORD	MA	est	Completed 3/6 with DF
1GBG5V1908F	2008	CHEV	C5500		SCHERERVILLE	IN	est	Completed 3/6 with DF
1GBG5V1999F	2009	CHEV	C5500		AUBURN	IN	est	Completed 3/6 with DF
J8BE5W16887	2008	CHEV	W5500		SOUTH SAN FRANCISCO	CA	pst	Completed 3/6 with DF
1GBG5U1908F	2008	CHEV	C5500		ALLEN PARK	MI	est	Completed 3/6 with DF
J8BE5W16887	2008	CHEV	W5500		HAYWARD	CA	pst	Completed 3/6 with DF
3FRNF66Z38V	2008	FORD	F650		LOMPOC	CA	pst	Completed 3/6 with DF
1GBG5V1919F	2009	CHEV	C5500		SARATOGA SPRINGS	UT	mst	Completed 3/6 with DL
3FRNF66Z48V	2008	FORD	F650		ONALASKA	WI	cst	Completed 3/6 with DL
1GBG5U1287F	2007	CHEV	C5500		MORGANTOWN	WV	est	Completed 3/6 with FS
1GBG5U1237F	2007	CHEV	C5500		ALBUQUERQUE	NM	mst	Completed 3/6 with RO
1GBG5V19X8F	2008	CHEV	C5500		BAKER	LA	cst	Completed 3/6, called FS
J8BE5W16197	2009	CHEV	W5500		NORTH ANDOVER	MA	est	Completed 3/6, rec'd vm
J8BE5W16387	2008	CHEV	W5500		YUMA	AZ	mst	Completed 3/6; called FS
1GBG5U12X7F	2007	CHEV	C5500		SOUTH BARRINGTON	IL	cst	Completed 3/6; called FS
3FRNF66W58V	2008	FORD	F650		MACON	GA	est	Completed 3/6; called JG
1GBG5U1948F	2008	CHEV	C5500		WHITINSVILLE	MA	est	completed 3/6; rec'd email
1GBG5V1979F	2009	CHEV	C5500		BIRCH RUN	MI	est	completed 3/6; rec'd email
1GBG5U1998F	2008	CHEV	C5500		NEW PALESTINE	IN	est	completed 3/6; rec'd vmail
1GBG5V1988F	2008	CHEV	C5500		TUSCALOOSA	AL	cst	completed 3/6; rec'd vmail
1GBG5V1989F	2009	CHEV	C5500		FORT MILL	SC	est	Completed 3/7 with BK
1GBG5U1287F	2007	CHEV	C5500		EL DORADO HILLS	CA	pst	Completed 3/7; called DL
1GBG5V1998F	2008	CHEV	C5500		WILMINGTON	DE	est	Completed 3/7; called DL
1GBG5V1949F	2009	CHEV	C5500		WEST PALM BEACH	FL	est	Completed 3/7; called KW
J8BE5W16887	2008	CHEV	W5500		CATONSVILLE	MD	est	Completed 3/8; called FS
1GBG5V1988F	2008	CHEV	C5500		MANSFIELD	TX	cst	Completed 3/9 with BK
1GBG5V1989F	2009	CHEV	C5500		HILLSVILLE	VA	est	Completed 3/9 with BK
J8BE5W16087	2008	CHEV	W5500		COLLINSVILLE	OK	cst	Completed 3/9 with BK
J8BE5W16887	2008	CHEV	W5500		TAMPA	FL	est	Completed 3/9 with BK
J8BE5W16887	2008	CHEV	W5500		PROCTORVILLE	OH	est	Completed 3/9 with BK
1GBG5V19X9F	2009	CHEV	C5500		GREENDALE	WI	cst	Completed 3/9 with BK
1GBG5U1237F	2007	CHEV	C5500		MOUNTAIN VIEW	MO	cst	Completed 3/9 with BK
1GBE5V1G58F	2008	CHEV	C5500		FREMONT	CA	pst	Completed 3/9 with DL
1GBG5V1999F	2009	CHEV	C5500		CIRCLEVILLE	OH	est	Completed 3/9 with DL
1GBG5U1277F	2007	CHEV	C5500		UNION CITY	PA	est	Completed 3/9 with DL
1GBG5V19X9F	2009	CHEV	C5500		CHERRYVALE	KS	cst	Completed 3/9 with FS
1GBG5V19X9F	2009	CHEV	C5500		GUNNISON	MS	cst	Completed 3/9 with FS
1GBG5U12X7F	2007	CHEV	C5500		ALBUQUERQUE	NM	mst	Completed 3/9 with KW
1GBG5V1978F	2008	CHEV	C5500		LEES SUMMIT	MO	cst	Completed 3/9 with SN
1GBG5V1918F	2008	CHEV	C5500		LAS CRUCES	NM	mst	Completed 3/9; called BK
J8BE5W16087	2008	CHEV	W5500		OAKLAND	CA	pst	Completed 3/9; called DL
1GBG5U1998F	2008	CHEV	C5500		CLACKAMAS	OR	pst	Completed 3/9; called FS
J8BE5W16987	2008	CHEV	W5500		WEXFORD	PA	est	Completed 3/9; called FS
1GBG5C1226F	2006	CHEV	C5500		ALABASTER	AL	cst	Completed at LDV
J8BE5W16287	2008	CHEV	W5500		LA CRESCENTA	CA	pst	Completed at LDV

1GBG5U1277F	2007	CHEV	C5500 VA	CLARKSTON	MI	est	Completed by Bostick GM; 3/9 (sendin
J8BE5W16X87	2008	CHEV	W5500	CICERO	IL	cst	Completed by LDV
J8BE5W16387	2008	CHEV	W5500	TWIN LAKES	WI	cst	Completed by LDV
1GBG5U1287F	2007	CHEV	C5500 VA	ERIE	PA	est	Completed on 3/6 with RO
1GBG5U1988F	2008	CHEV	C5500	WEST BLOOMFIELD	MI	est	Completed on phone with DL
1GBG5V1958F	2008	CHEV	C5500	CLEVELAND	OH	est	Completed; called 3/9
1GBG5U1237F	2007	CHEV	C5500	PEORIA	IL	cst	Completed; called DL
1GBG5V1989F	2009	CHEV	C5500	VESTAL	NY	est	Completed; emailed 3/7
J8BE5W16097	2009	CHEV	W5500	EAST FALMOUTH	MA	est	Completed; Howard Eastman called FS
1GBG5U1928F	2008	CHEV	C5500	SPRINGFIELD	MO	cst	Completed called FS
J8BE5W16487	2008	CHEV	W5500	TOMS RIVER	NJ	est	Completed on the phone with BK
1GBG5V1929F	2009	CHEV	C5500	MAUSTON	WI	cst	Completed on Phone with BK
1GBG5V1918F	2008	CHEV	C5500	BRIGHTON	MA	est	LM 3/6; LM 3/9
J8BE5W16787	2008	CHEV	W5500	BRITT	IA	cst	Completed on the phone with BK
J8BE5W16187	2008	CHEV	W5500	NEWARK	NJ	est	Completed on the phone with BK
1GBG5U1988F	2008	CHEV	C5500	WHITTIER	CA	pst	UNASSIGNED
1GBG5V1969F	2009	CHEV	C5500	PICKERINGTON	OH	est	Completed on the phone with BK
1GBG5V1999F	2009	CHEV	C5500	GAINESVILLE	FL	est	Completed on the phone with BK
1GBG5V1989F	2009	CHEV	C5500	BLUE SPRINGS	MO	cst	UNASSIGNED
3FRNF66Z68V	2008	FORD	F650	SALEM	OR	pst	Completed on the phone with DF
1GBG5U1237F	2007	CHEV	C5500	WASHINGTON	DC	est	Completed on the phone with BK
1GBG5U1227F	2007	CHEV	C5500 VA	FLORENCE	KY	est	Completed on 3/10 e-mail from Sara
1GBG5V1939F	2009	CHEV	C5500	CHESHIRE	CT	pst	Completed on the phone with BK
1GBG5U1908F	2008	CHEV	C5500	KENMORE	NY	est	Completed on the phone with BK
1GBG5U12X7F	2007	CHEV	C5500	RACINE	WI	cst	Completed on the phone with BK
1GBG5U12X7F	2007	CHEV	C5500	CINCINNATI	OH	est	Completed called FS

Count	81	
Complete	76	0.938272
Incomplete	5	

TAB B

LDV **Service Bulletin**

Battery Isolator Installation

Date: March 6, 2009

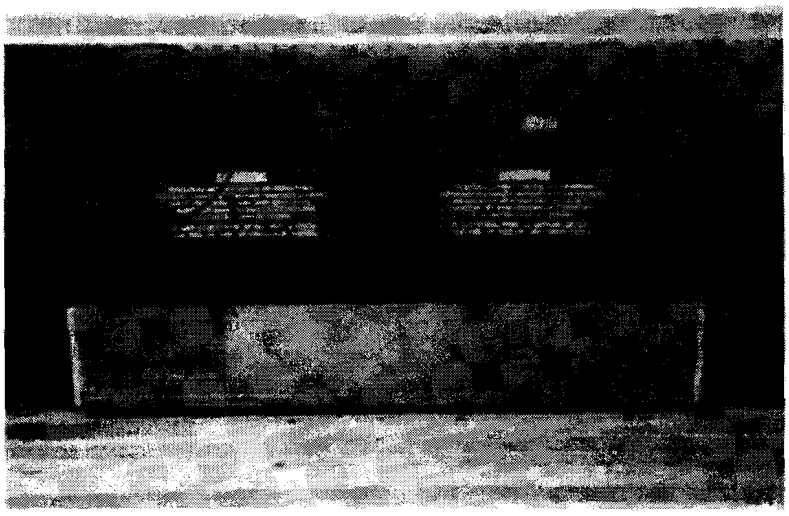
Applies to: All C5500, W-5, and F-650 Company Stores built before March 6, 2009.

Description:
A cable may be installed on the battery isolator with the body of the cable lug facing the isolator. With all cables tightened down on the stud, this cable lug may be pressed against the cooling fins of the isolator. This contact poses a risk of electrical short which could result in cables overheating.

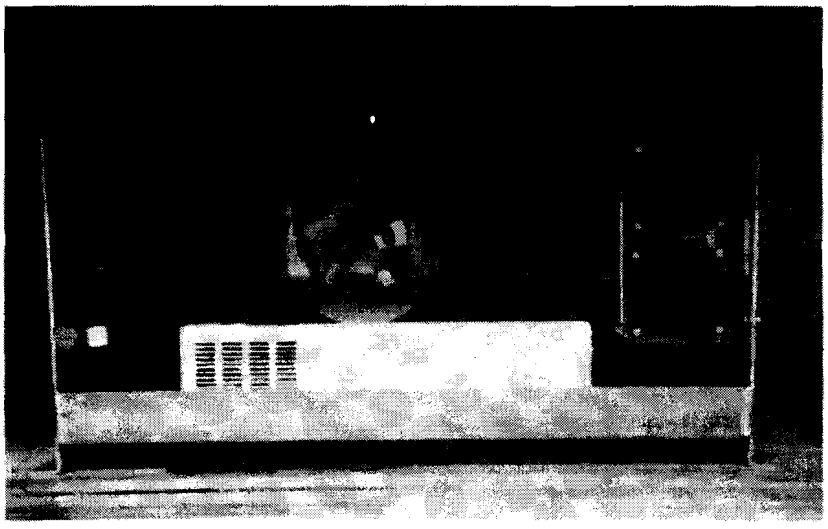
The directions below describe how to check and correct this condition to reduce the risk of such failure. This inspection process and corresponding alignment instructions should be followed and completed for continued vehicle use.

Directions:

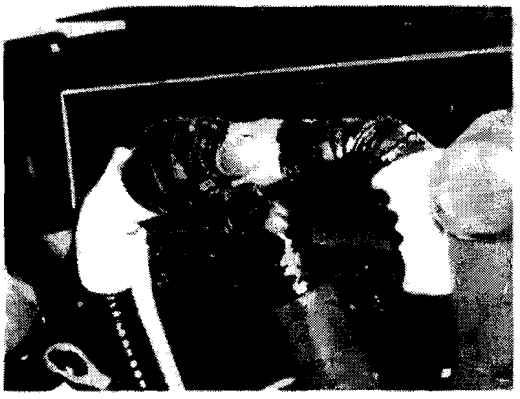
1. Turn off all DC loads at the power distribution panel
2. Remove the carpeted battery access panel to expose the auxiliary batteries.
    a. On a W5 model, this panel is located on the driver's side of the load space below the second set of shelves.
    b. On C5500 and F-650 models this is located on the passenger's side below the first set of shelves. The panel is attached with hook-and-loop (commonly known as Velcro™).
3. Disconnect the negative battery cable from the Auxiliary batteries. The negative battery cable will be located on the left side of the batteries toward the wall (see photo). The negative cable will be marked with black shrink tube (positive battery cables are marked with white).

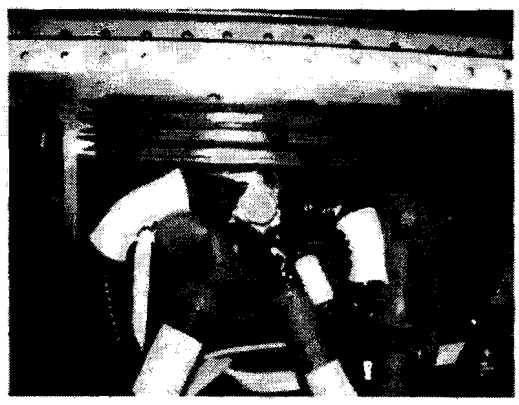


4. Remove the carpeted/vented panel to expose the power converter box.
    a. On W5 models this panel is located on the driver's side just to the rear of the auxiliary batteries.
    b. On C5500 and F-650 models this is located on the driver's side, opposite of the batteries. This panel is also attached with hook-and-loop (commonly known as Velcro™).
5. On the battery isolator, remove the nut on the auxiliary power stud. This is the stud on the left side of the isolator with white marked cables attached (identified on photo).

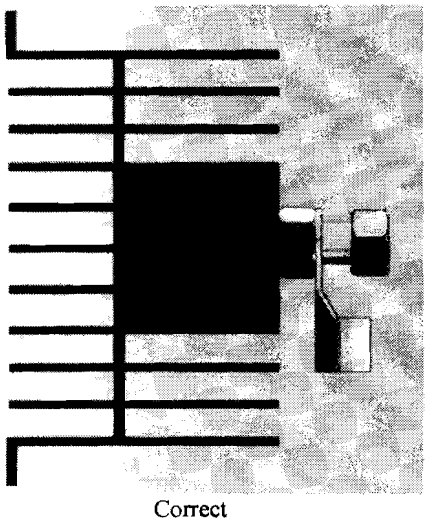


6. Inspect the cables on the stud (remove if necessary) to ensure that all cables are installed such that the body of the cable lug points away from the isolator (see image after step 8). Spread out cables so all lugs can sit flush.

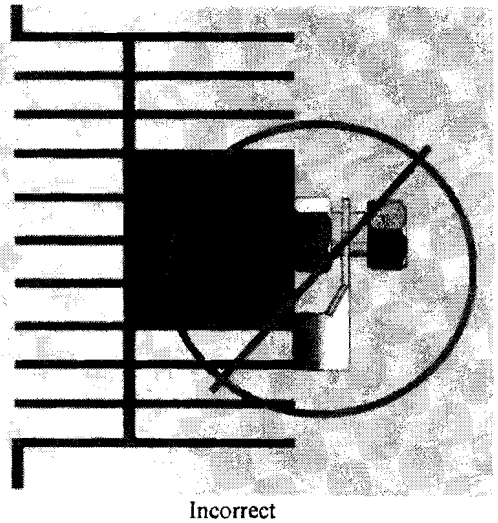




7. Replace the nut on the stud. It may be necessary to remove the lock washer in order to ensure the nut is seated fully.
8. IMPORTANT: Verify that no cables touch the blue cooling fins of the isolator. (see image below)



Correct



Incorrect

9. Replace the carpeted/vented panel for the power converter box.
10. Replace the negative battery cable.
11. Replace the carpeted battery compartment access panel.

Contact LDV with any questions, 1-800-558-5986.

TAB C

Failure Report for Gutierrez Fire

General Description:
A W-5 company store experienced an electrical fault that caused an over-current condition on the AC circuit for the power converter. This resulted in melting insulation which created smoke and an acrid odor. A hot spot was discovered on the street side exterior of the box and when punched with a halligan, the hole emitted smoke and flames. A fire extinguisher was discharged into the hole and the fire went out. Damage included several melted wires and cables, charred wood panels, and burned insulation.

Detailed Description:
On January 27, 2009 Company Store operator Ryan Gutierrez noticed an acrid odor and smoke in the tool area of his W-5 Company Store while parked in a parking lot. He called 911 and began recording the events using the video feature of a digital camera.

The local fire department responded and inspected the vehicle. Mr. Gutierrez was asked to turn off battery power and he turned off his inverter.

Several minutes later a spot was noticed outside the vehicle on the street side that was hot and discolored. Firefighters used a halligan tool to punch a hole in the location. Smoke immediately came out of the hole. When pried open further, flames started coming out of the hole. Firefighters discharged a fire extinguisher into the hole and the fire went out.

Firefighters cut two lines up the side of the truck from the hole to trace the wires and ensure the fire was out.

When the fire department was finished with the vehicle, Mr. Gutierrez drove the truck to LDV for inspection and repair.

LDV Inspection:
When the truck returned to LDV, the body panels were removed from the street side to allow close inspection of the wiring. The interior panel was also removed from the front wall to allow inspection of wiring and the electrical panels.

The ground wire for the AC circuit for the power converter was melted along most of its length and had caused several other wires and cables to be melted as well. A section of that wire was completely missing in the area where the fire department cut open the truck.

The wall insulation was blackened along the path of the AC power cable and the wood wall panels were charred. No signs of arcing were found on the inside of the aluminum body panels.

The worst damage and the source of the original hot spot was where the main cable for inside DC power, AC cables for the power converter and inverter, and a few small DC

wires come together and pass through a hole into the wall. The inside power cable was badly damaged. The 150 amp breaker for the inside power cable was found tripped.

Measurements were taken on the power converter. The ground connection for the power converter was common with the chassis of the power converter, the aluminum box in which it is mounted, and the negative battery terminal. No positive battery connections were found to be grounded. There were no signs of damage to the power converter outlet or the AC power cable on the power converter.

The power converter was removed for inspection and bench testing. No problems were found with the power converter or inverter. Upon detailed inspection of the isolator evidence of electrical arcing was found near the stud for the auxiliary battery bank. One cable on the stud was noted as being installed with the body of the lug pressing against the cooling fin of the isolator.

Failure Analysis:
Wear through the electrical tape on the cable lug allowed a short to the body of the isolator. The isolator is mounted on an aluminum box along with the inverter, power converter, and outlet box for the power converter outlet, each of which provides a path to ground. This electrical short directed battery current through the 12AWG ground wire of the power converter circuit back to the distribution panel to ground. The current exceeded that safe capacity of the ground wire and caused the melting witnessed.

A bench test was conducted to recreate the conditions on the truck with the suspected fault. The test was performed using the power converter, inverter, isolator, aluminum box and all related cables and hardware that were removed from the Gutierrez truck. A 20ft 12/3 cable was installed between the power converter outlet and ground. Battery power was applied and within 2 minutes the 12/3 cable for the power converter outlets was melting and producing smoke. Measurements throughout the test showed that approx. 98% of battery current was directed through the 12/3 cable with the remaining 2% going through the power converter and inverter chassis.

Corrective Action:
Step 1: It is recommended that all Company Stores built on C5500, W5, or F650 chassis be inspected for cable installation to ensure all cables are installed with the lug body facing away from the isolator with none in contact with the cooling fins.

Step 2: It is also recommended that a grounding strap or cable be added to the aluminum box to properly ground it and the components mounted within it. This cable can be attached using the existing ground stud located on the left side of the box. Additional testing will done to confirm.