



November 3, 2010

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 and as a supplement to our October 1, 2010 notification regarding this matter. You have assigned this recall number 10V-470. 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 potentially containing the noncompliance are certain 2006 through 2011 model year Winnebago View[®] and Itasca Navion[®] motor homes. These motor homes were manufactured from March 18, 2005 through July 19, 2010. The vehicles were identified using production records showing models and VINs.
3. The total number of vehicles potentially containing the noncompliance is 2,537.
4. It is estimated that 100 percent of the vehicles contain the noncompliance.
5. Winnebago Industries, Inc. has decided a noncompliance with Federal Motor Vehicle Safety Standard No. 210 exists with the dinette area seat belts. In a collision, stress can cause the attachment to tear and allow the anchor to separate from the body of the vehicle. The safety belt may not protect an occupant in the event of a vehicle crash.
6. N/A.
7. Winnebago Industries, Inc. discovered this noncompliance as a result of compliance testing. When a normal production assembly arrived for testing in August 2010, it did not represent the design intended for production. Evaluation shows that the testing prior to original design and production confirmed that using two separate anchorage bolts (one for each half of a seat belt) in the floor design met FMVSS 210 requirements. However, we have found that the final design has two seat belt assemblies placed side by side using three anchorage bolts rather than four. In this case, the center of the three anchorage bolts accepts one-half of each belt assembly. This method of attachment will not consistently meet FMVSS 210 criteria.
8. Winnebago Industries, Inc. will remedy this noncompliance by adding additional seat belt anchorage(s). Winnebago Industries[®] estimates the dealer letter will be mailed on or about November 12, 2010. The owner letter will be mailed two weeks later.
9. Enclosed is a copy of the dealer letter in draft form.

RP135 US/1

Ms. Kathleen C. DeMeter, Director
November 3, 2010
Page Two

10. Enclosed is a copy of the owner letter in draft form.

11. The recall documents will carry the Winnebago Industries, Inc. Number 118.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald W. Post". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ronald W. Post
Product Compliance Manager

RP135 US/2

Enclosure

TO: Winnebago Industries, Inc. Dealers

SUBJECT: Campaign #118 – View®/Navion® Seat Belt Anchorage

The National Traffic and Motor Vehicle Safety Act, as amended, provides that each vehicle which 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. A failure to adequately repair within 60 days after tender of a vehicle is prima facie evidence of failure to repair within a reasonable time.

If the condition is not adequately repaired within a reasonable time, the owners may be entitled to an identical or reasonably equivalent vehicle at no charge or to a refund of the purchase price less a reasonable allowance for depreciation.

To avoid having to provide these burdensome solutions, every effort must be made to promptly schedule an appointment with each owner and to repair their vehicle as soon as possible. As you will see in reading the enclosed copy of the letter which is being sent to owners, the owners are being instructed to contact Winnebago Industries, Inc. if you do not remedy the condition within five days of the mutually agreed upon service date. If the condition is not remedied within a reasonable time, they are instructed on how to contact the National Highway Traffic Safety Administration.

REASON FOR THIS RECALL

Winnebago Industries, Inc. has decided a noncompliance with Federal Motor Vehicle Safety Standard No. 210 exists with the dinette area seat belts. In a collision, stress can cause the attachment to tear and allow the anchor to separate from the body of the vehicle. The safety belt may not protect an occupant in the event of a vehicle crash. These motor homes were manufactured from March 18, 2005 through July 19, 2010.

OWNER NOTIFICATION

Owners will be notified of this campaign on their vehicles by Winnebago Industries, Inc. For all units in your inventory, the notification will be mailed to you. **DO NOT DELIVER TO A CUSTOMER ANY SUBJECT UNIT UNTIL CORRECTIVE ACTION HAS BEEN TAKEN.** Enclosed is a list of vehicles shipped to you.

DEALER CAMPAIGN RESPONSIBILITY

Dealers are to service all vehicles subject to this campaign at no charge to owners regardless of mileage, age of vehicle, or ownership from this time forward.

Whenever a vehicle subject to this campaign is taken into new or used vehicle inventory or it is in your dealership for service in the future, you should take the steps necessary to be sure the campaign correction has been made before reselling or releasing the vehicle. Owners of vehicles recently sold from your new vehicle inventory are to be contacted by the dealer and arrangements made to make the required correction according to instructions contained in this campaign.

INSTRUCTION TO PERFORM CAMPAIGN #118

Affected Models:

2006 and 2007 Winnebago View and Itasca Navion (Models 523J).
2008 through 2011 Winnebago View and Itasca Navion (Models 524J).

Repair Procedure:

Refer to instruction sheet for addition of the seat belt anchorage bolt(s).

Parts Information:

To minimize any inconvenience to your customers, we strongly encourage you to promptly order part kits for the vehicles on the attached list. This will ensure you have adequate inventory for your customers. Order the following Part Kit from Winnebago Industries® using the WIN NET system. You will be placing the order as a recall order. You will need the recall dealer number and the Winnebago Industries serial number of the affected vehicle to place the order.

Dealer Number: 7688

Quantity	Part Description	Winnebago Industries Part Number
1	Instruction Sheet	RC7688-11-718
2	½" x 2½" Grade 5 Carriage Bolts	
4	½" Hex Nuts w/Nylon Insert	

REIMBURSEMENT

When the service has been completed, submit the labor amount and labor operation number listed below. Your repair order must be properly signed by both the dealer and the owner.

	<u>OPERATION NUMBER</u>	<u>TIME ALLOWANCE</u>
Add one seat belt anchorage (2010 and 2011 models) - OR -	24180101	.6 hr.
Add two seat belt anchorages (2006 through 2009 models)	24180201	.9 hr.

Thank you for your cooperation.

Winnebago Industries, Inc.
Forest City, Iowa 50436

RP135 US/4

Enclosures

**RE: BODY SERIAL
CHASSIS SERIAL**

Dear Owner:

This notice is being sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. Our records indicate that you have purchased a vehicle with the serial number which appears above.

REASON FOR THIS RECALL

Winnebago Industries, Inc. has decided a noncompliance with Federal Motor Vehicle Safety Standard No. 210 exists with the dinette area seat belts. In a collision, stress can cause the attachment to tear and allow the anchor to separate from the body of the vehicle. The safety belt may not protect an occupant in the event of a vehicle crash. These motor homes were manufactured from March 18, 2005 through July 19, 2010.

WHAT WE WILL DO

Winnebago Industries, Inc. dealers will add additional seat belt anchorage(s) at no charge to you.

WHAT YOU SHOULD DO

Please contact your Winnebago Industries, Inc. dealer immediately to arrange for an appointment. Please allow sufficient time for your dealer to obtain the kit for this recall. The labor time necessary to perform this correction will be approximately one hour. Please allow time for the dealer to process your vehicle.

Winnebago Industries, Inc. dealers are best equipped to obtain parts and provide service to ensure your vehicle is corrected as promptly as possible. HOWEVER, if you take your vehicle to the dealer on the agreed date and he does not service this condition on that date or within five days, we recommend you contact Winnebago Industries, Inc., Attn.: Owner Relations Representative (641-585-6939). If you are still unable to obtain such service without charge to you and within a reasonable time, you may contact the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street S.W., Washington, DC 20590 or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153) or go to <http://www.safercar.gov>.

IF YOU HAVE PREVIOUSLY PAID FOR THIS REPAIR

If you have paid to remedy this issue, you may be eligible for a refund. To obtain information on a refund, contact Winnebago Industries Owner Relations by e-mail at or@winnebagoind.com or write us at Owner Relations Department, P.O. Box 152, Forest City, Iowa 50436 or by telephone at 1-641-585-6939 or 1-800-537-1885.

IF YOU HAVE CHANGED ADDRESS OR SOLD THE VEHICLE

If you have changed address or sold or traded your vehicle, please let us know by contacting Winnebago Industries Owner Relations by e-mail at or@winnebagoind.com or in writing at Owner Relations Department, P.O. Box 152, Forest City, Iowa 50436 or by telephone at 1-641-585-6939 or 1-800-537-1885.

Page Two

Presentation of this letter to the service center will assist in making the necessary correction to your vehicle in the shortest possible time.

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

We are sorry to cause you this inconvenience; however, we have taken this action in the interest of your safety and continued satisfaction with our products. This letter does not constitute an acknowledgment of legal liability.

Winnebago Industries, Inc.
Forest City, Iowa 50436

RP135 US/6

Enclosure