

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

On 8/28, 2013, Open Range R.V. in accordance with Fastec and Challenger Door [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: 8/28/2013

Furnish the manufacturer's identification code for this recall (if applicable): 13E039 – Per Fastec

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.

Open Range R.V. Company

3195 N SR 5

Shipshewana, IN 46565

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

Russ Draper – Director of Parts/Warranty/Service

rdraper@openrangerv.com

Telephone Number: 260-768-7771x121 Fax No.: 260-768-4461

Name and Title of Person who prepared this report.

Curtis Carlson – Retail Customer Service Manager

Signed: Curtis W. Carlson

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 Ms. Jennifer Timian at (202) 366-5210, by FAX at (202) 366-7882, or by E-Mail to RMD.ODI@dot.gov.

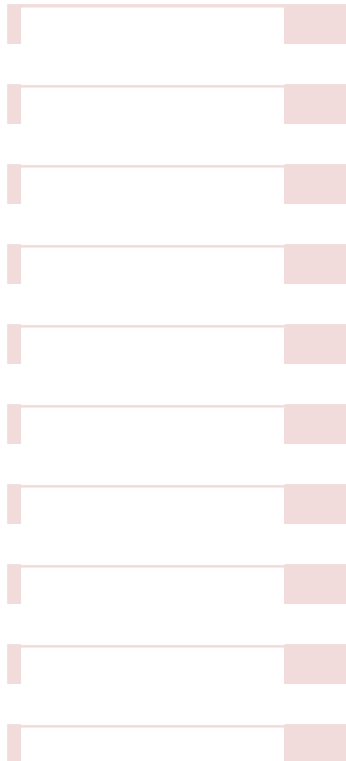
I. Identify the Vehicle Models Involved in the Recall

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): Open Range R.V. **Model Years Involved:** 2009-2013. **Model(s):** 280RLS; 322RKS; 328RLS; 335BHS; 337RLS; 385RLS; 391RES; 392BHS; 399BHS; 400BHS; JF280RLS; JF287RLS; JF335BHS; JF392BHS; JT287RLS; JT315RLS; JT331BHS; JT337RLS; 287RLS; 310RLS; 345RLS; 379RKS; 393RLS; 399DBR; 399SRL; 427BHS; 429BHS; H341RGR; H395RGR; H396RGR; H397RGR; JF399BHS; JH341RGR; JT301BHS; JT305RLS; JT340FLR; PE119TH; R398RLS; R398RSS; R416RLS; RF316RLS; RT266RLS; RT281FLR; RT296BHS; RT303BHS; RT331BHS; 375BHS; 413RLL; 424RLS; H320MPR; H345MPR; JT359FKS; MR243F; MR274B; MR281FLR; MR285F; MR287B; MR289H; MR293R; MR303BHS; MR325B; MR331BHS; R412RSS; RF270RLS; RF280RLS; RF287RLS; RF298BWS; RF335BHS; RF392BHS; RT247FLR; RT316RLS; 359RKS; 386FLR; H304RGR; JT353FES; LF289RES; LF297RLS; LF305BHS; LT252FLR; LT305BHS; MF316RLS; MF329BHS; MF337RLS; MF338RLS; MF357RES; MF395BHS; MR281F; MR316R; R430RLS; RA398FLS; RF329BHS; RF337RLS; RF338RLS; RF357RES; RF395BHS; RT320RES; 389BHS

Production Dates: Beginning: 10/1/2007. **Ending:** 7/12/2012.

VIN Range: Beginning: 5XMFR332795000001. Will provide shortly. **Ending:** 5XMFL3520D2009554.



**THE VEHICLE IDENTIFICATION NUMBERS (VIN) HAVE BEEN REDACTED AS PER:
HCO 2180.1 GSA Rules of Behavior for Handling Personally Identifiable Information (PII)**

The product consists of certain travel trailer locks with a keyed paddle handle and deadbolt (the “locks”) installed in the doors of RVs. Only FIC locks that have an integrated deadbolt are affected by this recall. The RVs potentially affected by the recall are as follows:

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. 100%

II. Identify the Recall Population

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

<u>Model</u>	<u>Year; 2009-2013</u>	<u>Number of Vehicles Potentially Involved; 9,600</u>
280RLS; 322RKS; 328RLS; 335BHS; 337RLS; 385RLS; 391RES; 392BHS; 399BHS; 400BHS; JF280RLS; JF287RLS; JF335BHS; JF392BHS; JT287RLS; JT315RLS; JT331BHS; JT337RLS; 287RLS; 310RLS; 345RLS; 379RKS; 393RLS; 399DBR; 399SRL; 427BHS; 429BHS; H341RGR; H395RGR; H396RGR; H397RGR; JF399BHS; JH341RGR; JT301BHS; JT305RLS; JT340FLR; PE119TH; R398RLS; R398RSS; R416RLS; RF316RLS; RT266RLS; RT281FLR; RT296BHS; RT303BHS; RT331BHS; 375BHS; 413RLL; 424RLS; H320MPR; H345MPR; JT359FKS; MR243F; MR274B; MR281FLR; MR285F; MR287B; MR289H; MR293R; MR303BHS; MR325B; MR331BHS; R412RSS; RF270RLS; RF280RLS; RF287RLS; RF298BWS; RF335BHS; RF392BHS; RT247FLR; RT316RLS; 359RKS; 386FLR; H304RGR; JT353FES; LF289RES; LF297RLS; LF305BHS; LT252FLR; LT305BHS; MF316RLS; MF329BHS; MF337RLS; MF338RLS; MF357RES; MF395BHS; MR281F; MR316R; R430RLS; RA398FLS; RF329BHS; RF337RLS; RF338RLS; RF357RES; RF395BHS; RT320RES; 389BHS _____ _____ _____ _____ _____ _____ _____		

Total Number Potentially Affected by the Recall: 9,600

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

I received a letter from Fastec/Challenger Door attached above. This prompts us to issue a 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.

Fastec and Challenger Door notified **Open Range R.V.** that Fastec intended to initiate a recall of the potentially affected locks due to a potential jamming issue with the deadbolt cylinder. If a lock is affected, the key may be able to be removed from the locked door when the key in the deadbolt cylinder is in the horizontal 9 o'clock position, potentially jamming the deadbolt and potentially causing the red lever on the interior side of the lock to become inoperable. In that event, a person inside the travel trailer may not be able to unlock and open the main RV door, but he or she could still exit the trailer from the emergency exit.

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

Entry doors that we purchase from Challenger Door have had these fastec locks in them, in turn, this affects a significant amount of our production. The cause is a faulty lock.

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

Entry door will not open.

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

A seized lock.

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

Challenger Door

24785 US 6

PO Box 67

Nappanee, IN 46550

574-773-0470

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

Jason Helmuth

JRHelmuth@challengerdoor.com

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.

Open Range R.V. received information via the internet that prompted me to contact the vendor(s); Challenger Door and Fastec to see what products of ours this affected.

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.

Open Range R.V. received information via the internet that prompted me to contact the vendor(s); Challenger Door and Fastec to see what products of ours this affected.

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.

Fastec Industrial Corp., a division of WESCO Distribution, Inc., will announce, under the auspices of the US Consumer Product Safety Commission, a voluntary recall and replacement program for certain Travel Trailer Lock Deadbolt Cylinders manufactured by Zhongshan Huafeng Lock Product Co., Ltd. and sold under the FIC brand name between January 1, 2006 and April 25, 2013 (the "Recall Period").

Our records indicate that Fastec sold potentially affected locks to you during the Recall Period.

I. Deadbolt Cylinders Subject to Recall

The potentially affected locks are all deadbolt locks that were sold during the Recall Period with one of the following WESCO part numbers: 43610-00 (Chrome), 43610-06 (Black), 43610-09 (White), 40610-00 (Chrome), 40610-06 (Black), 40610-09 (White), 44610-03 (Chrome), 44610-06 (Black), 44610-09 (White).

The deadbolt cylinders subject to recall fall into two categories.

First, a deadbolt lock with one of the WESCO part numbers sold during the Recall Period is subject to recall if it has one of the following 18 cylinder key codes: HF-304, HF-307, HF-308, HF-311, HF-313, HF-315, HF-316, HF-320, HF-322, HF-323, HF-328, HF-331, HF-335, HF-339, HF-342, HF-343, HF-347, and HF-349.

The cylinder key code of the lock is stamped on the metal shaft of the Black Headed FIC user key. (Example HF-347, image 1).

Image 1



The cylinder key code additionally may be found on a white label that is attached to the main body of the lock. (Example: Ref: Code HF-311, image 2). In the case of a mounted lock, remove the four interior mounting screws and remove the interior paddle handle and plate assembly to view the label.

Image 2



Second, the recall includes *any* deadbolt lock with one of the WESCO part numbers, *regardless* of the key code, where the key can be removed from the deadbolt cylinder when the key is in the 9 o'clock position and the deadbolt is engaged. Under normal use and operation, the keys to the lock should only be able to be removed in the 12 o'clock (neutral) and 3 o'clock (unlocked) positions.

II. Free Replacement Cylinders for Recalled Locks in Your Possession

If you have in your possession a FIC deadbolt lock with one of the WESCO part numbers that is subject to recall – either because it has one of the 18 key codes or because the key can be removed from the deadbolt cylinder when the key is in the 9 o'clock position and the deadbolt is engaged – do not sell it. Instead, please contact FIC by calling (800) 837-2505.

You will receive a new set of Lock Cylinders for both the exterior paddle handle as well as the deadbolt. Since the deadbolt cylinder and the paddle handle cylinders are keyed the same, both the paddle and deadbolt replacement cylinders will be provided free of charge.

When you receive the replacement cylinders you will also receive information as to how to remove and replace the cylinders and a prepaid return shipping package so that affected cylinders and keys can be returned to Fastec.

III. Recalled Locks No Longer in Your Possession

If you sold recalled deadbolt locks to other businesses, please provide them with a copy of this letter so that they do not sell them to others without contacting FIC and receiving free replacement cylinders.

If you would prefer, please provide us, instead, with a mailing list of your business customers to whom you sold recalled locks, and we would be happy to contact them ourselves. We would use the mailing list for no other purpose.

IV. Consumers

Please note that we are not yet contacting individual consumers. And, we ask that you not do so at this time.

Contacting individual consumers must be done under the auspices of the US Consumer Product Safety Commission and it likely will not occur for a few months. Please note that Fastec will provide appropriate instructions to consumers to enable them to replace the lock cylinders on their own without the involvement of a dealer or the RV manufacturer. Please do not have any dealers undertake any corrective actions or perform any replacement work on any locks in the possession of consumers at this time.

If you have a mailing list of end-consumers that have a potentially affected lock in their possession, please let us know. With your permission, we would be happy to notify end consumers that you can identify by direct mail once the recall is jointly announced with the US Consumer Product Safety Commission.

V. Reason for the Recall

Under normal use and operation, the keys to the lock should only be able to be removed from the cylinder in the 12 o'clock (neutral) and 3 o'clock (unlocked) positions.

If, contrary to the locks' design, the key can be and is removed from the lock when it is in the 9 o'clock position and the deadbolt is engaged, then the deadbolt may jam and prevent occupants inside the travel trailer

from being able to operate the red deadbolt lever to unlock the door from the inside and exit the trailer through that door.

Fastec encourages you to contact us to obtain replacement cylinders for recalled locks immediately. Pending replacement of any locks that already are installed, do not lock the deadbolt using the key from the outside. Or, if you do so, ensure that the key is returned to the 12 o'clock (neutral) position after engaging the deadbolt, in which case the lock should operate properly.

Please contact Fastec if you have any questions or to obtain replacement cylinders for recalled deadbolt locks in your possession. We appreciate your cooperation and understanding.

Sincerely,

Fastec Industrial Corp.

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.

Fastec encourages you to contact us to obtain replacement cylinders for recalled locks immediately. Pending replacement of any locks that already are installed, do not lock the deadbolt using the key from the outside. Or, if you do so, ensure that the key is returned to the 12 o'clock (neutral) position after engaging the deadbolt, in which case the lock should operate properly.

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

A replacement lock will be sent out.

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.

We no longer use these locks. We have since switched to Bauer Locks.

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.

Currently working on nailing down a vin # range so that I can provide Fastec with that information so that the mailings to dealers/customer can be completed.

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.