

# FAX COVER SHEET

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TO: Alex Amole

Date: 10-9-08

Number of Pages including cover: 11

Attention: \_\_\_\_\_

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Per your request!

Thank You.

Lauri Wilson



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Sent out  
7/28/08

Dear National Highway Traffic Safety Admin,

I am writing to let you know that this company SRT Prosthetics Edon Motor Coach, sold the Bus in question several years ago, and no longer have it in our possession.

I have the name of the gentleman that bought it at Auction, his name and address are as follows; [REDACTED] This is all the information I have on him, but that should be enough to get you connected to him I hope. Thanks for your time in this matter.

Sincerely Yours,

Lauri Wilson  
SRT P&O



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

JUL 7 2008

Srt Prosthetics Edon Motor Coach  
1115 W High St  
Bryan, OH 43506

NVS-215AA  
EQ08-010  
08E-032

**Attn: Compliance Dept. / Warranty Dept.**

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured and to remind you of your responsibilities under Federal law.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 08E-032. In a letter dated April 11, 2008, Dometic Corporation (Dometic) reported that certain two-door refrigerators contain a boiler tube that may fatigue and develop a crack. Should a cracked boiler tube release a concentrated amount of cooling liquid and an ignition source is present, a fire may occur. A fire can cause personal injury to vehicle occupants. NHTSA assigned recall number 08E-032 to this matter.

In Dometic's Defect Information Report, Srt Prosthetics Edon Motor Coach (your company) was identified as a purchaser of these units. A copy of Dometic's report is enclosed for your information.

**Please Note:** Your company might have been involved in a previous Dometic two-door refrigerator recall from August 2006 (NHTSA recall number 06E-076). This new recall serves as a follow-up to the previous recall and expands the serial number range for affected units. This new recall may require your attention and any similar means of action your company might have taken for the 2006 recall. Should your company have received these newer recalled units and installed them as original equipment in a motor vehicle; a new Defect Information Report will be required.

If your company received an information request letter from NHTSA regarding the 2006 Dometic 06E-076 recall and your company has not issued a response or filed a Defect Information Report with this office, please contact us immediately as civil penalties are currently being assessed per 49 U.S.C. §30165 for this failure to respond.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify the National Highway Traffic Safety Administration (NHTSA) whenever they decide that a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard is identified in one of their vehicles. In the case of a defect or

\*\*\*\*  
NHTSA

noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. A detailed guide to safety recalls may be found at <http://www-odi.nhtsa.dot.gov/recalls/static/recompendium.pdf>. Sample forms may be found at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. As of the date of this letter, we have not received a report from your company.

This letter serves to remind you of your company's responsibilities, and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the defective unit; a chronology of all principal events involving the determination that a safety related defect may exist in your company's vehicle(s), including related communications between your company and Dometic; and an identification of your company's role in the distribution chain for potentially affected refrigerators. Specifically, please include the date on which you received notification of this matter from Dometic.

If you primarily sell new vehicles or equipment for purposes other than resale, please identify yourself as a dealer. If you primarily sell new vehicles or equipment for resale, please identify yourself as a distributor. If you manufacture new motor vehicles, please identify yourself as a vehicle manufacturer. If you manufacture original equipment for new motor vehicles, please identify yourself as an original equipment manufacturer. If you manufacture motor vehicle equipment for resale, please identify yourself as a replacement equipment manufacturer. (For more detailed definitions please see 49 U.S.C. § 30102).

In view of the risk of fire and injury, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective refrigerators. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the defect notification report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for

- each segment); and
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company does not agree with the decision made by Dometic that the equipment contains a safety defect, please provide an explanation for your company's position. If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company resold any of the equipment other than in its products, please identify the purchaser by name and address.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ08-010**. A Defect Noncompliance Report guide is available on-line to assist you at <http://www.nhtsa.dot.gov/cars/problems/manufacturer/forms.html>. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,



George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures



# Dometic

08E-032  
(5 pages)

April 11, 2008

**VIA CERTIFIED MAIL, Ret. Rec. Req.**

Mr. Dan Smith  
Associate Administrator of Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE  
Washington, DC 20590



Dear Mr. Smith:

Please find enclosed a Notification of Defect which Dometic Corporation is submitting pursuant to 49CFR, Part 573.6.

Please contact me if you have any questions or if you require additional information at

We are continuing the preparation of media documents for your approval and the acquisition of the customer, dealer, and OEM lists for this population of products. The customer, dealer, and OEM lists will be submitted under application and request for confidentiality to your lead counsel as soon as these are completed.

The remedy identified in the original recall 06E076 will be employed for this recall expansion. Only the serial numbers for these units will be different, as the model numbers are all the same. If you elect to identify a new and second recall campaign for this additional population of refrigerators, please notify us of the new campaign number as soon as possible so that it can be added to the instructions for remedy kits and the repair service claim card that each customer must fill out and return when their refrigerator is serviced. This will enable us to effectively place the remedy and repair for our customers on an available status within two-to-three weeks of this notification.

Thank you for your consideration.

Respectfully,

Patrick N. McConnell

Dometic Corporation

Director Engineering, Product Safety, & Standards

RECEIVED  
2008 APRIL 15  
OFFICE OF DEFECTS INVESTIGATION  
RECALL MGMT DIV.

- cc: Mr. John Waters, Dometic Corporation (via email)
- Mr. Brad Sargent, Dometic Corporation (via email)
- Mr. Kenth Bengtsson, Dometic Corporation (via email)
- Mr. Doug Diesterly, Esq, Barnes and Thornburg (via email)
- Mr. Richard Paulen, Barnes and Thornburg (via email)

## POTENTIAL DEFECT NOTIFICATION

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

Dometic Corporation ("Dometic") 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 a potential defect are two-door refrigerators manufactured between June 1 of 2003 and September 30 of 2006. The potentially affected refrigerators have the model designations set forth below:

RM-2652xxxxx  
RM-2662xxxxx  
RM-3662xxxxx  
RM-3663xxxxx  
RM-2852xxxxx  
RM-2862xxxxx  
RM-3862xxxxx  
NDR-1062xxxxx

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

320xxxxx through 352xxxxx  
401xxxxx through 452xxxxx  
501xxxxx through 552xxxxx  
601xxxxx through 639xxxxx

The potential safety related defect is associated with the cooling unit at the back of the refrigerator cabinet. A fractional percentage of the potentially affected refrigerators have experienced a fatigue crack in the area of the welds between the boiler tube and the heater pockets. A fatigue crack may release a sufficient amount of pressurized coolant solution into an area where an ignition source is present. Under certain limited 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;
2. The boiler tube must develop a throughway fatigue crack within a specific size range;
3. There must be a release of the cooling solution at a rate which will allow the accumulation of the cooling solution at a concentration and temperature within its range of flammability;  
and
4. There must be ignition source present

**If any of these conditions are not present, a release of the cooling solution will not result in a fire. A boiler fatigue crack with a loss of cooling solution without ignition would result in a non-operational refrigerator and does not present a fire safety issue.**

For the population of product with the models and serial number range shown above from the 20<sup>th</sup> week of 2003 through the 39<sup>th</sup> week of 2006, a potential inconsistent weld process may have contributed to the weld fatigue resulting in a crack of the boiler to heater pocket welds or in the boiler tube on cooling units manufactured or warehoused during this period.

Increased market demand required a new production line with new state-of-the art technology to be introduced and the old production line to be updated with the same new technology between the end of 2005 through January of 2006. This improvement in technology and the streamlining of the production weld process significantly reduced the variability of the boiler to heater pocket seam welds. By September 30, 2006 all quantities of cooling units manufactured prior to the introduction of the new production line technology having the potential safety related defect were used and no longer in inventory.

The list of products shown above are all refrigerators used in the original manufacture of recreation vehicles as well as replacement equipment for recreation vehicles. The total population of these refrigerators potentially containing the defect is 745,574. Dometic estimates that as many as 0.005% may develop weld or boiler fatigue cracks which may result in a fire. There are no incidents of death related to the affected population of Dometic refrigerators.

Dometic has continued to review claims subsequent to NHTSA recall campaign 06E-076 to verify the integrity of the rationale and to make certain that other contributing factors were not present that could cause fatigue on units beyond the original recall population and dates. This review revealed that microscopic cracks could randomly be

found in the boiler metal) in the area of the weld between the heater pocket and boiler tube which could release coolant into the area of the burner. These findings have resulted in the preparation of this notice.

The field remedy used for the Dometic recall 06E-076 is equally effective for use on this population of product and will be deployed in identical fashion as previously identified. Dometic, along with conducting their own recall campaign, will participate in the remedy campaigns initiated by the original equipment manufacturers. A list of original equipment manufacturers to whom Dometic has sold the potentially defective refrigerators will be forwarded as Exhibit "A" upon its preparation.

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 11<sup>th</sup> of April 2008

Dometic Corporation

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

## **EVENT CHRONOLOGY FOR NHTSA RECALL EXPANSION**

Dometic issued a defect notification and initiated recall 06E-076 on August 28, 2006. In Recall 06E-076 Dometic established that under certain limited circumstances a boiler fatigue crack could develop and release coolant which could ignite and result in a fire. These conditions were:

1. The refrigerator must be on and normally operating;
2. The boiler tube must develop a throughway fatigue crack within a specific size range.
3. There must be a release of the cooling solution at a rate which will allow the accumulation of the cooling solution at a concentration and temperature within its range of flammability;  
and
4. There must be an ignition source present

**If any of these conditions are not present, a release of the cooling solution will not result in a fire. A loss of cooling solution without ignition results in a non-operational refrigerator and is not a safety concern.**

During 2006 and 2007 Dometic continued analyzing the defect scenario and developed a field remedy to address and significantly reduce the safety hazard created by the potential defect. In April of 2007 we initiated the recall campaign under NHTSA recall number 06E-076 and have deployed over 177,000 recall remedy kits to the field.

Between the end of 2005 and January 2006 a new boiler weld production line and an update of the old boiler weld production line at the Motala Sweden production facility were implemented for capacity reasons. These new lines incorporated the newest technology from the welding industry, improved capability and reduced process variation through more robust design of the welding arm, using new welding units and processes, with a continuous seam employing better welding rods. Continued analysis reveals that these welding line changes have significantly reduced the risk for inconsistency. By September 30, 2006 all quantities of cooling units manufactured prior to the introduction of the new production line technology having the potential safety related defect is considered to have been used and the inventory cleared.

Although we are certain that the oversized heater identified in recall 06E-076 was a major contributor to boiler tube failures, Dometic's continued review and analysis of product returns and claims, after the defect notification to NHTSA, has shown that it cannot be ruled out that a fatigue crack could develop in the weld or boiler tube. We therefore made a determination to expand our recall for the time period between week 20 of 2003 and week 39 of 2006.



**FACSIMILE TRANSMITTAL SHEET**

TO LORI WILSON

FROM BETTY JEAN

DATE: JULY 17, 2008

FAX NUMBER: 419-633-3981

TOTAL NO. OF PAGES INCLUDING COVER

1

PHONE NUMBER: 419-633-3961

URGENT     FOR REVIEW     PLEASE COMMENT     PLEASE REPLY     PLEASE RECYCLE

NOTES/COMMENTS:

If you do not receive any of these pages, please telephone 419-636-5500 or call Toll Free 1-866-870-5500 as soon as possible. Thank You.

HERE IS THE NAME OF PERSON WHO BOUGHT SAM'S BUS



CALL IF ?'S  
BJ