



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**DEC 30 2008**

Mr. Ron Green  
President  
Irvine Shade & Door, Inc  
1000 Verdant Dr  
Elkhart, IN 46516

NVS-215aa  
EQ08-015  
07V-411  
08V-639

Dear Mr. Green,

In a letter dated September 6, 2007 Keystone RV Company (Keystone) notified the National Highway Traffic Safety Administration (NHTSA) that it had decided certain Irvine Shade and Door, Inc (Irvine) glass shower doors with towel bars that were installed on recreational vehicles produced between October 19, 2006 through July 26, 2007 were defective, and that the defect related to motor vehicle safety. Keystone stated these towel bars can come into contact with, and potentially break, the shower glass door should pressure be applied. This risk of glass breakage can result in personal injury. NHTSA assigned recall number 07V-411 this matter. In a letter dated, December 4, 2008 Coachmen Recreational Vehicle Company, LLC (Coachmen) also reported this issue to NHTSA concerning Coachmen vehicles produced between June 15, 2001 and August 6, 2007 containing this Irvine equipment. NHTSA assigned recall number 08V-639 to this recall. A copy of each of these Defect Information Reports is attached.

The Office of Defects Investigation, Recall Management Division (RMD) is conducting an investigation of the circumstances of these safety recalls. The purpose of this request is to identify any and all motor vehicles that may have contained these or similar shower doors that are defective and to determine the need for any similar safety recalls. In order for my staff to determine this need, we require additional information from you. Accordingly, please provide answers to the following questions listed below. Please restate each question prior to providing the answer.

1. Explain the nature of the defect and how Irvine believes it relates to motor vehicle safety. If Irvine does not believe this defect relates to motor vehicle safety, please so state and explain any reasoning, methodology, testing, or analysis that led to this conclusion.
2. Provide the total number of the shower doors with towel bars that Irvine manufactured, sold, and shipped that may possibly exhibit this defect and the beginning date and ending date of their manufacture. Identify design changes, supplier changes or other factors that indicate the beginning and ending period of the defective production. Please provide the number of any defective shower doors that may still be within the control of Irvine.



3. List all Irvine customers that purchased or otherwise received this equipment and provide their company name, address, phone number, contact person, quantity sold to each, and sale date. Identify each of these customers that are known by Irvine to be manufacturers of new motor vehicles and which may have installed the defective shower doors in new motor vehicles
4. Provide information for any other Irvine motor vehicle equipment that may exhibit the same defect. Also list all Irvine customers that were sold this additional equipment.
5. Please advise us whether or not Irvine intends to notify its owners, purchasers, and dealers of the defect in accordance with 49 U.S.C. § 30118(c)(1) and 30119(d)(2).

Federal Regulation 49 CFR part 573, Defect and Noncompliance Reports, requires that a manufacturer of motor vehicles or replacement equipment notify the National Highway Traffic Safety Administration (NHTSA) about each defect in its products that it decides is related to motor vehicle safety (Defect Report). In the case of a defect decided to exist in original equipment installed in the vehicles of more than one manufacturer, compliance of 573.6 is required of each vehicle manufacturer as to the vehicles in which the equipment has been installed as well as the manufacturer of the original equipment item. In this matter, there have been two defect reports filed by vehicle manufacturers regarding equipment manufactured by Irvine, however to date we have not received notification of the above-described defect from Irvine.

You must submit a Defect Report should you agree that a safety defect is present in these glass shower doors with mounted towel bars. Submission of this report to NHTSA and the initiation of a safety recall campaign will satisfy your company's response to this information request however you must provide the customer information requested in question 3 nonetheless. Should your company not agree a safety defect is present in this equipment, you must provide a complete explanation as well as answer the above question.

This letter is being sent to Irvine 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. It constitutes a new request for information. Irvine's failure to respond promptly and fully to this letter could subject Irvine to civil penalties pursuant to 49 U.S.C. §30165 or lead to an action of injunctive relief pursuant to 49 U.S.C. §30163. If Irvine believes that it should file a Defect Report with NHTSA in accordance with 49 CFR Part 573, please do so promptly. If needed, a guide is available on-line to assist you at <http://www-odi.nhtsa.dot.gov/recalls/>.

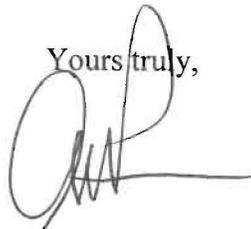
If Irvine claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Irvine must submit supporting information together 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. Irvine 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.

Irvine's response, in writing must be submitted to RMD within 10 days of receiving this letter, referencing EQ08-015, either by FAX, e-mail, or any other method which enables Irvine to verify promptly that it was in fact received by RMD and the date it was received.

If you have any questions, please contact Mr. Alex Ansley of my staff at (202) 493-0481, by FAX at (202) 366-1767, or by e-mail at alexander.ansley@dot.gov.

Yours truly,

A handwritten signature in black ink, appearing to be "G. Person", written over the text "Yours truly,".

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

Enclosures



RECEIVED  
2007 SEP. - 10 PM 3:30  
DEFECTS INVESTIGATION  
RECALL MGMT DIV.

2642 Hackberry Dr Goshen, IN 46526

September 6, 2007

**VIA E-MAIL  
RECEIPT CONFIRMATION REQUESTED**

07V-411  
(4 Pages)

Mr. George H. Person  
National Highway Traffic Safety Administration  
Office of Defects Investigation  
1200 New Jersey Ave SE  
Washington, DC 20590

Re: Keystone RV Company  
Defect and Non-Compliance Report

Dear Mr. Person:

Keystone RV Company ("Keystone") has decided that a defect which relates to motor vehicle safety exists in the recreational vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

- A. Recall Population and Vehicle Identification. The recall population includes the following product brands manufactured by Keystone.

<u>Product Brand</u>	<u>Number of Vehicles</u>
2007 Big Sky Fifth Wheels Production Dates: 10/19/2006 – 5/2/2007 VIN Range: 4YDF3402674710000 - 4YDF360247A710185	186
2008 Big Sky Fifth Wheels Production Dates: 5/2/2007 – 7/26/2007 VIN Range: 4YDF340228A710000 - 4YDF350278A710130	131
The total number of vehicles subject to this recall campaign is:	317

- B. Description of Defect. The vehicles subject to this recall campaign have a towel bar installed on the glass shower door. When pressure is applied to the towel bar, the edge of the bar may contact the glass and result in an increased risk of glass breakage and personal injury.

Supplier – Irvine Shade and Door, Inc 1000 Verdant Dr Elkhart, IN 46516  
Supplier Contact – Jim Lintz

- C. Basis for Determining that a Defect Exists. The defect was discovered during a review of warranty claims. All Big Sky vehicles manufactured up until the problem was discovered are included in the recall.
- D. Remedying of Defect. The remedy is to replace the towel bar mounting hardware. New mounting hardware and installation instructions will be mailed to retail customer and dealers. If retail customers do not wish to replace the mounting hardware themselves, they can take their vehicle to a Keystone dealer to get the remedy performed at no charge.
- E. Owner Notifications. Keystone will notify the owners of the recreational vehicles by letter beginning on September 17, 2007 pending NHTSA approval. A final copy of the owner letter will also be provided to NHTSA, along with the dealer repair procedures.
- F. Quarterly Reporting Requirements. Keystone will be filing quarterly reports in connection with this recall campaign.
- G. Campaign Number. Keystone's identification code for this recall is 07-092.

If you need any additional information regarding this recall campaign, please feel free to contact me at 574-537-3925.

Sincerely,

Garett Carolus  
Keystone RV Company  
Technical Manager



**Keystone RV  
Company**

**RECREATIONAL VEHICLE SAFETY RECALL NOTICE**

Customer Name  
Street Address  
City, ST Zip

Safety Recall:  
Service Advisory: 07-092

VIN: 4YD

Dear Customer Name:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Keystone RV Company has decided that a defect which relates to motor vehicle safety exists in certain model year 2007 and 2008 Big Sky Fifth Wheel Recreational Vehicles. As a result, Keystone RV is conducting a safety recall. We apologize for any inconvenience this action may cause you; however your safety and continued satisfaction are of the utmost importance to us.

***Reason  
for this  
recall***

The vehicles subject to this recall campaign have a towel bar installed on the glass shower door. When pressure is applied to the towel bar, the edge of the bar may contact the glass and result in an increased risk of glass breakage and personal injury.

***What we  
will do***

With this letter we have supplied new mounting hardware for the towel bar and instructions for replacing the hardware. If you are currently using your Big Sky, please replace the mounting hardware immediately. If not, replace the hardware before using your vehicle.

***What we  
need you  
to do***

If you are not comfortable replacing the hardware yourself, you are welcome to make arrangements with your dealer to have the supplied mounting kit installed at no charge to you. At your earliest convenience, please make an appointment to have your RV serviced by your dealership. The labor time to perform this correction is approximately 10 minutes. Please ask your dealer if you wish to know how much additional time will be needed to schedule and process your RV for this repair.

***If you have  
questions***

Your dealer is best equipped to obtain parts and provide service to ensure your RV is corrected as promptly as possible. If your dealer is unable to assist or if you take your RV to your dealer on the agreed service date, and the dealer does not remedy the condition within a reasonable amount of time, or without charge to you, please contact Keystone Customer Service by calling 1-866-425-4369.

If after contacting your dealer and Keystone Customer Service you are still not satisfied we have done our best to remedy this situation, you may also submit a written complaint to: Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, SE, Washington, DC 20590. You may call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153; or go to <http://www.safercar.gov>.)

Thank you for your attention and cooperation in this matter.

Sincerely,

**KEYSTONE RV COMPANY**

Rick Deisler  
Sales & Service Manager

cc: National Highway Traffic Safety Administration (NHTSA)



**2642 Hackberry Drive - Goshen, IN 46528**  
**Phone: (574) 535-2100 - Fax: (574) 535-2199**  
**[www.keystonerv.com](http://www.keystonerv.com)**

## INSTALLATION INSTRUCTIONS

### Big Sky Shower Door Towel Bar

**Models Included:** All Big Sky

**Serial Number Range: 2007 Models** 7A710000 – 7A710185

**Serial Number Range: 2008 Models** 8A710001 – 8A710130

**Parts Required per Unit:** KRV # 247285 Replacement Hardware Kit

**Tools Required:** None

Keystone RV Company is conducting a voluntary **RECALL** notification campaign in accordance with the National Traffic and Motor Vehicle Safety Act. It has been determined that on some vehicles the shower towel bars mounting hardware will allow the edge of the towel bar to flex into the glass door. This results in an increased risk of glass breakage and personal injury. These instructions will explain how to correct the problem.

### ONE INSTRUCTIONS

- Step 1** Remove the two mounting bolts as shown in figure 1. Use caution or glass breakage and personal injury may result. Discard the old mounting bolts, insert rings and flat washers.
- Step 2** Using the new hardware kit (KRV # 247285 – 2 bolts, 4 washers, and 2 insert rings) install the insert rings in the hole in the glass door and one flat washer on each side of the glass. Firmly hand tighten the knurled bolt. Do not over tighten or use tools on the knurled bolt head.

Remove mounting bolt

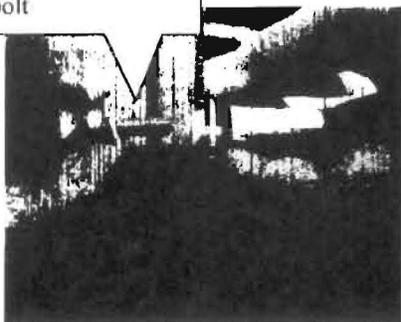


Fig 1

New hardware kit

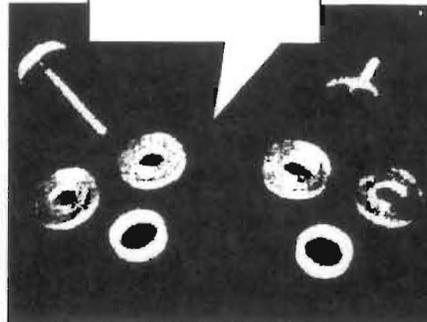


Fig 2

Be sure to hand tighten firmly

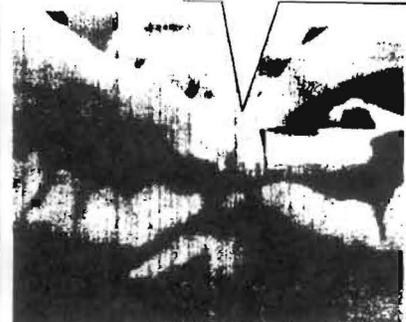


Fig 3

If you have any questions, please call Keystone RV Customer Service at (866) 425-4369.



COACHMEN RECREATIONAL VEHICLE COMPANY, LLC

December 4, 2008

**VIA E-MAIL  
RECEIPT CONFIRMATION REQUESTED**

**08V-639  
(3 pages)**

Director, Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh St., S.W.  
Washington, DC 20590

Re: Part # 573 Defect and Noncompliance Report – Coachmen Recreational Vehicle Company, LLC – Shower Doors

Dear Mr. Person;

Coachmen Recreational Vehicle Company, LLC (Coachmen) has determined that a defect which relates to motor vehicle safety exist in certain recreational vehicles manufactured by Coachmen. A list of the affected vehicles is included with this notification as "Attachment A". These products were manufactured between June 15, 2001 and August 6, 2007.

We will provide NHTSA with the total number of recreational vehicles manufactured by Coachmen that are potentially affected by this defect as soon as that information has been determined.

**DESCRIPTION OF DEFECT**

The affected vehicles have a towel bar installed on a glass shower door. These shower doors (with towel bars) were supplied to Coachmen RV by Irvine Shade and Door, Incorporated (Irvine). When pressure is applied to the towel bar, the edge of the bar may contact the glass and result in an increased risk of glass breakage and personal injury.

**DISCOVERY OF THE DEFECT**

In November, 2008 Coachmen RV became aware of a recall campaign being conducted by Keystone RV Company (07V-411) relating to glass shower doors with towel bars that were supplied to them by Irvine Shade and Door. Further investigation determined that Irvine had supplied the same and other similar shower doors with towel bars to Coachmen and that the same failure potential described in 07V-411 exists on those products as well.

RECEIVED

2008 DEC -4 10:35 AM

DEFECTS INVESTIGATION  
RECALL MGMT DIV.

**PRECLUSION OF POTENTIAL DEFECT**

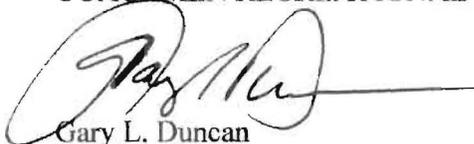
Irvine has new towel bar mounting hardware that reduces the pressure that can be applied to the glass shower door through the towel bar. The new mounting hardware and installation instructions will be mailed to affected retail customers and dealers. If the retail customers do not wish to replace the mounting hardware themselves, they will be able to take their vehicle to a Coachmen dealer and have the remedy performed at no charge.

All purchasers and dealerships that receive these units with the potential defect will be advised by mail regarding this problem.

Will submit our proposed owner notification letter for your approval shortly.

Very Truly Yours,

COACHMEN RECREATIONAL VEHICLE COMPANY, LLC

A handwritten signature in black ink, appearing to read "Gary L. Duncan", with a long horizontal line extending to the right.

Gary L. Duncan  
Vice President, Engineering

Cc: Michael Terlep, Jr. – Coachmen RV Group

**ATTACHMENT "A"**

**Sheet #1**

Part 573 Defect Notification

Coachmen Recreational Vehicle Company, LLC

Irvine Shade and Door, Inc. – Glass Shower Door with Towel Bar

4-Dec-08

**AFFECTED PRODUCT LIST - SORTED BY MODEL**

<b><u>MODEL</u></b>	<b><u>TYPE</u></b>	<b><u>MODEL YEARS</u></b>
Adrenaline	Fifth Wheel Trailer	2006, 2007, 2008
Aurora	Motorhome – Class A	2006
Captiva	Travel Trailer	2007
Cascade	Travel Trailer	2004, 2005, 2006
Catalina	Fifth Wheel Trailer	2004
Catalina	Travel Trailer	2004, 2005
Chaparral	Fifth Wheel Trailer	2006, 2007
Chaparral	Travel Trailer	2005, 2006, 2007
Cheyenne	Motorhome – Class C	2003, 2004
Concord	Motorhome – Class C	2004, 2005
Cross Country	Motorhome – Class A	2003, 2004, 2005, 2006, 2007
Cross Country Elite	Motorhome – Class A	2003, 2004
Cross Country SE	Motorhome – Class A	2005, 2006
Freedom	Motorhome – Class C	2005, 2006
Freelander	Motorhome – Class C	2004, 2005, 2006, 2007
Freeport	Motorhome – Class C	2003, 2004
Georgie Boy Cruise Air XL	Motorhome – Class A	2005, 2006
Georgie Boy Cruise Master	Motorhome – Class A	2005, 2006
Georgie Boy Landau	Motorhome – Class A	2005, 2006, 2007
Georgie Boy Maverick	Motorhome – Class C	2006, 2007
Georgie Boy Pursuit	Motorhome – Class A	2007
Leprechaun	Motorhome – Class C	2002, 2003, 2004, 2005, 2006, 2007
Mirada	Motorhome – Class A	2004, 2005, 2006, 2007, 2008
Santara	Motorhome – Class A	2004, 2005
Santara	Motorhome – Class C	2002, 2003, 2004, 2005, 2006
Shasta Cheyenne	Motorhome – Class C	2002
Shasta Freeport	Motorhome – Class C	2002
Somerset	Fifth Wheel Trailer	2005
Somerset Dreamcatcher	Fifth Wheel Trailer	2004
Spirit of America	Travel Trailer	2007
Sportscoach Elite	Motorhome – Class A	2007, 2008
Sportscoach Encore	Motorhome – Class A	2005, 2006, 2007, 2008
Sportscoach Legend	Motorhome – Class A	2008
Sportscoach Pathfinder	Motorhome – Class A	2007, 2008

**ATTACHMENT "A"**

**Sheet #1**

Part 573 Defect Notification

Coachmen Recreational Vehicle Company, LLC

Irvine Shade and Door, Inc. – Glass Shower Door with Towel Bar

Revised 12/09/09

*POPULATION INVOLVED: 13,662*

**AFFECTED PRODUCT LIST - SORTED BY MODEL**

<u>MODEL</u>	<u>TYPE</u>	<u>MODEL YEARS</u>
Adrenaline	Fifth Wheel Trailer	2006, 2007, 2008
Aurora	Motorhome – Class A	2006
Captiva	Travel Trailer	2007
Cascade	Travel Trailer	2004, 2005, 2006
Catalina	Fifth Wheel Trailer	2004
Catalina	Travel Trailer	2004, 2005
Chaparral	Fifth Wheel Trailer	2006, 2007
Chaparral	Travel Trailer	2005, 2006, 2007
Cheyenne	Motorhome – Class C	2003, 2004
Concord	Motorhome – Class C	2004, 2005
Cross Country	Motorhome – Class A	2003, 2004, 2005, 2006, 2007
Cross Country Elite	Motorhome – Class A	2003, 2004
Cross Country SE	Motorhome – Class A	2005, 2006
Freedom	Motorhome – Class C	2005, 2006
Freelander	Motorhome – Class C	2004, 2005, 2006, 2007
Freeport	Motorhome – Class C	2003, 2004
Georgie Boy Cruise Air XL	Motorhome – Class A	2002, 2003, 2004, 2005, 2006
Georgie Boy Cruise Master	Motorhome – Class A	2002, 2003, 2004, 2005, 2006
Georgie Boy Landau	Motorhome – Class A	2002, 2003, 2004, 2005, 2006, 2007
Georgie Boy Maverick	Motorhome – Class C	2006, 2007
Georgie Boy Bellagio	Motorhome - Class A	2004
Georgie Boy Pursuit	Motorhome – Class A	2002, 2003, 2004, 2005, 2006, 2007
Leprechaun	Motorhome – Class C	2002, 2003, 2004, 2005, 2006, 2007
Mirada	Motorhome – Class A	2004, 2005, 2006, 2007, 2008
Santara	Motorhome – Class A	2004, 2005
Santara	Motorhome – Class C	2002, 2003, 2004, 2005, 2006
Shasta Cheyenne	Motorhome – Class C	2002
Shasta Freeport	Motorhome – Class C	2002
Somerset	Fifth Wheel Trailer	2005
Somerset Dreamcatcher	Fifth Wheel Trailer	2004
Spirit of America	Travel Trailer	2007
Sportscoach Elite	Motorhome – Class A	2007, 2008
Sportscoach Encore	Motorhome – Class A	2005, 2006, 2007, 2008
Sportscoach Legend	Motorhome – Class A	2008
Sportscoach Pathfinder	Motorhome – Class A	2007, 2008