

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Robert E. Wozniak  
Director of Engineering Services-Motor Home Group  
Fleetwood Enterprises, Inc.  
2970 Myers Street  
Riverside, CA 92513-7638

NSA-11ntn  
RQ00-001

Dear Mr. Wozniak:

The Office of Defects Investigation (ODI) is conducting a review of Safety Recall 99V-277 issued by Fleetwood Enterprises, Inc. (Fleetwood) on October 5, 1999, concerning "disproportionate front axle weight distribution" in approximately 3,400 Class A motorhomes.

The apparent significant additional weight added to these motorhomes by installation of the slide out sections appears to cause at least localized overloading. The purpose of this letter is to get information about the subject vehicles, the scope of the recall, the nature of the defect, and Fleetwood's recall remedy.

ODI has received 5 reports alleging vehicle instability during driving or unusually fast front tire wearout. All of these motorhomes have a slide out section. A copy of each of these reports is enclosed for your information.

Unless otherwise stated in the text, the following definitions and instructions apply to this request for information:

- **Fleetwood**: Fleetwood Enterprises, Inc., all officers and employees, whether assigned to its principle offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone, and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Fleetwood (including all business units and persons previously referred to) who in or after 1994, were involved in any way with any of the following related to the alleged defect in the subject vehicles:

*Fleetwood-IR2*

- (a) design, engineering, analysis, modification or production (e.g. quality control);
  - (b) testing, assessment or evaluation;
  - (c) consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
  - (d) communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including, but not limited to, people who have the capacity to obtain information from dealers.
- **Safety recall 99V-277:** the recall described in Fleetwood's Defect Information Report dated October 5, 1999, pertaining to the disproportionate front axle weight distribution for approximately 3,400 1996 through 2000 model year American Dream, American Eagle, and American Tradition Class A motor homes. Fleetwood reports the "recall remedy will be to equip the subject motor homes with new larger capacity front tires, to adjust the weight distribution on the front axle (if necessary), to apply the new certification labels as required by CFR [49] Part # 568 and CFR 49 Part 571.120 and to reinforce consumer education about the importance of tire maintenance, including rotation, alignment and tire inflation pressure."
  - **Subject vehicles:** Fleetwood Class A motorhome vehicles involved in recall 99V-277; and all Fleetwood motorhomes with slide out sections or rooms.
  - **Slide Out:** the section of a motorhome wherein a portion of a side or end wall of the vehicle can be moved outward from the remainder of the affected wall(s). The slide out assembly refers to the moveable section, and all tracks, supports, and operating equipment necessary for the installation and operation/movement of the slide out.
  - **Alleged defect:** any failure, malfunction, or otherwise unsatisfactory performance of the motorhome undercarriage, including the frame, front or rear axle assemblies and the attachment of the assemblies to the vehicle, suspension, and the tires, which may have been caused by any disproportionate weight distribution or overloading associated with the installation of one or more slide out sections.
  - **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all nonidentical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes,

manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Fleetwood, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a nonidentical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Fleetwood or not. If a document is not in the English language, provide both the original document and an English translation of the document.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Please repeat the applicable request verbatim above each response. After Fleetwood's response to each request, identify the source of the information and indicate the last date the source updated the information prior to the preparation of the response. Insofar as Fleetwood has previously provided a document to ODI, Fleetwood may either produce it again, or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the Information Request letter (including the subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

If Fleetwood cannot respond to any specific request or subpart thereof, please state the reason why it is unable to do so. If Fleetwood claims that any document or other information or material responsive to any of the following items need not be provided to NHTSA because it is privileged or the work product of an attorney, separately by information request number, for each document or other information or material, state the nature of that information or material and identify any document in which it is found

by date, subject or title, name and position of the

person from, and the person to whom it was sent, and the name and position of any other recipient. Fleetwood must also describe the basis for the claim, and explain why Fleetwood believes it applies.

1. State the total number of Fleetwood motorhomes equipped with slide out sections manufactured for sale in the United States by:
  - a. for the vehicle
    1. make, model name, model year, and model code;
    2. chassis supplier;
    3. engine (size and fuel system);
    4. overall length, overall width, wheelbase, and track width (front and rear);
    5. Gross Vehicle Weight Rating (GVWR), Front Gross Axle Weight Rating (GAWR), and Rear GAWR; and
  - b. with respect to the slide out section(s) of each motorhome model code:
    1. slide out location,
    2. length, height, width, and depth of the slide out section;
    3. nominal weight of slide out section as installed in the motorhome, this includes the weight of all tracks, supports, and operating equipment necessary to move the slide out.
2. Furnish the number and copies of all the following:
  - a. owner, consumer, or fleet reports or complaints and
  - b. field reports, other reports and similar documents, from all sources either received or authorized by Fleetwood, or of which Fleetwood is otherwise aware;

pertaining to the alleged defect in the subject vehicles. This would include, but not be limited to, complaints or information provided by various consumer groups, government agencies, insurance companies, and other entities which would have provided such information to Fleetwood. Furnish all reports whether or not Fleetwood has verified each report, including all correspondence, notes, memoranda, and other records pertaining or relating to the performance of the front axle and components thereof in the subject vehicles.
3. Furnish the number and copies of all reports related to each of the following:
  - a. all crashes, fires, and injury incidents;
  - b. all subrogation claims;
  - c. third-party arbitration proceedings (where Fleetwood is a party to the arbitration); and

d. all lawsuits, both pending and closed, in which Fleetwood is or was a defendant (or codefendant), or of which Fleetwood is otherwise aware.

This includes all those which have occurred or may have occurred, at least in part, due to circumstances, conditions, or problems caused by the alleged defect in the subject vehicles. Provide a brief synopsis of each case including Fleetwood's analysis of the alleged incident, a description of any injuries and property damage involved, the identification of the vehicle (model, model year, and VIN), and the vehicle owner (name and address). Furnish a copy of all police reports, accident/fire reports, documents by or for insurance companies and their agents and contractors, and all other documents related to a crash, injury incident, or fire. Identify all parties involved in each lawsuit and arbitration proceeding, including the caption, court, docket number, filing date, nature of the claim(s) as related to the alleged defect and the final disposition, if any. These reports should include, but not be limited to those identified in Fleetwood's Defect Information Report for 99V-277.

4. State the total number of (a) warranty claims, including extended warranty claims, and (b) requests for "good will," field, zone, or similar adjustments received by Fleetwood that relate, or could relate, to the alleged defect on the subject vehicles by make, model, model year, model series code, calendar month and year, and problem claim code. Each problem claim code must be identified. Furnish a complete copy of each of the claims or adjustments.
5. Furnish a copy of each service, warranty, or technical document(s) Fleetwood has prepared, including (but not limited to), bulletins, advisories, informational documents, training documents, or other communications, that were sent to any dealers, regional or zone offices, or field offices, or were sent to any such entities or offices, related to the following:
  - a. the alleged defect in the subject vehicles;
  - b. at least in part, the installation, attachment, replacement, or performance of the slide out in the subject vehicles; and
  - c. at least in part, the performance of the suspension, steering, or brakes of the subject vehicles.
6. From the start of production of the subject vehicles, identify and describe each and every modification or change made by, on behalf of, or known to Fleetwood in the design,

material composition, supplier, manufacture, testing, quality control, or installation of the slide out assembly, and all components thereof, originally installed, or which is authorized by Fleetwood for installation in the subject vehicles. The following information must be included for each modification or change:

- a. the date on which the modification or change was incorporated into production;
  - b. a description of the modification or change;
  - c. the reason for the modification or change;
  - d. the part numbers of the original, and of the modified or changed components;
  - e. the disposition of the unmodified/unchanged components in Fleetwood production inventory, Fleetwood distribution and dealer stock, and the supplier's inventory, furnishing the date(s) if such components were removed or withdrawn from sale or inventory; and
  - f. state whether the modified or changed components could be interchanged with earlier production components.
7. From the start of production of the subject vehicles, identify and describe the significant modifications or changes made by, on behalf of, or known to Fleetwood in the design, material composition, supplier, manufacture, testing, quality control, or installation of the undercarriage, and all components thereof, originally installed, or which is authorized by Fleetwood for installation in the subject vehicles. The following information must be included for each modification or change:
- a. the date on which the modification or change was incorporated into production;
  - b. a description of the modification or change;
  - c. the reason for the modification or change;
  - d. the part numbers of the original, and of the modified or changed components;
  - e. the disposition of the unmodified/unchanged components in Fleetwood production inventory, Fleetwood distribution and dealer stock, and the supplier's inventory, furnishing the date(s) if such components were removed or withdrawn from sale or inventory; and
  - f. state whether the modified or changed components could be interchanged with earlier production components.
8. Identify separately each and every study, simulation, evaluation, analysis, inquiry, test program, survey, investigation, or similar action, conducted by or for Fleetwood or under its control, pertaining to:
- a. the "disproportionate front axle weight distribution" defect identified by Fleetwood ;
  - b. the engineering analysis conducted by Fleetwood referred to in the chronology to 99V-277; and
  - c. the proposed remedy for safety recall 99V-277, including development of the inspection procedure or test, the inspection/test criteria and how the criteria was developed, and all documentation pertaining to the adequacy of the inspection

procedure or test in (i) identifying the alleged defect and (ii) possible damage to the components caused by the inspection/testing.

Provide a copy of each and every document relating to any such study, simulation, evaluation, analysis, inquiry, test program, survey, investigation, or similar action, and including the objectives, procedures, schedule, and results for each, regardless of whether the documents are in interim, draft, or final form. For all uncompleted or planned activities, provide (a) a description of the action (including the objective and procedures); (b) the date it was, or will be, initiated; (c) a detailed schedule for the work to be done; and (d) the expected completion date.

9. Identify separately each and every design/product development study, simulation, evaluation, design validation test program, or similar action, conducted by or for Fleetwood or under its control, pertaining to (a) the slide out section and (b) motorhome with slide out section that Fleetwood may have used or considered in developing, or preproduction development, of the slide out in motorhomes. Provide a copy of each and every document relating to any such study, simulation, evaluation, test program, or similar action, and including the objectives, procedures, schedule, and results for each, regardless of whether the documents are in interim, draft, or final form.
10. For each of the subject vehicles, by make, model code, and model year, list the capacities of the following tanks installed on the vehicle: grey water tank, waste water tank, fresh water tank, L. P. tank, and fuel tank(s). In addition, provide dimensioned floor plans for those models, clearly locating the slide out(s) and the aforementioned tanks.

This letter is being sent to Fleetwood 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 and to make reports to NHTSA. Fleetwood's failure to respond promptly and fully to this letter could subject Fleetwood 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. Other remedies and sanctions are available as well.

Fleetwood's response to this letter, in duplicate, must be submitted to this office **by April 4, 2000**. Please include in Fleetwood's response the identification codes referenced on page one of this letter. If Fleetwood finds that it is unable to provide all of the information requested within the time allotted, Fleetwood must request an extension from me at (202) 366-5226 no later than five business days before the response due date. If Fleetwood is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Fleetwood then has available, even if Fleetwood has received an extension.

If Fleetwood considers any portion of its response to be confidential information, 49 CFR Part 512, "Confidential Business Information," requires that Fleetwood submit two

copies of those document(s) 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, to the Office of Chief Counsel, National Highway Traffic Safety Administration, Room 5219 (NCC-30), 400 Seventh Street, SW, Washington, D.C. 20590. In addition, Fleetwood must provide supporting information for the request for confidential treatment in accordance with part 512.4(b) and (e) and include the name, address, and telephone number of a representative to receive a response from the Chief Counsel.

If you have any technical questions concerning this matter, please contact Mr. Nha Nguyen at (202) 366-6280 or by fax at (202) 366-7882.

Sincerely,

Jonathan D. White, Chief  
Recall Analysis Division  
Office of Defects Investigation

NHTSA:ODI:NSA  
NSA-11:JWhite:kjs:65226: December 10, 2008  
cc: NSA-11 subj/chron/Final 2-15-00  
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