



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

400 Seventh Street, S.W.  
Washington, D.C. 20590

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

NOV 25 2003

Robert E. Wozniak, Director  
Engineering and Product Compliance  
Fleetwood Enterprises  
Recreational Product Group  
2970 Myers Street, P. O. Box 7638  
Riverside, CA 92513-7638

NVS-214tb  
RQ03-009

Dear Mr. Wozniak,

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Recall Query (RQ03-009) to clarify certain aspects the Defect Information Report that Fleetwood Enterprises filed on October 29, 2003.

According to the information that Fleetwood Enterprises ("Fleetwood") provided to ODI during communications conducted between October 20 and October 24, 2003,

- (1) Fleetwood owners had experienced more than 50 incidents between July 2002 and September 2003 in which a wheel had separated completely from their vehicle.
- (2) Fleetwood mailed an Owner Information Bulletin to their affected customers in May 2003 that stated that the "Owner's Manuals do not contain the correct torque requirements for the optional 'Aluminum Wheel' wheel lug nuts."

With respect to this information, ODI notes that

- (1) The May 2003 notification ("bulletin") provided by Fleetwood did not conform to the requirements of 49 CFR 577.

The bulletin did not provide owners with complete and pertinent information. The bulletin advised owners that the Owner's Manual contained incorrect wheel mounting nut torque values without informing owners that the aluminum wheels had been tightened to incorrect values during assembly in Fleetwood's assembly facilities.

- (2) Fleetwood did not file a 573 Defect Report as required by 49 CFR 573 until October 29, 2003, after receiving an informal telephone inquiry from ODI regarding a complaint that a Fleetwood owner had filed with NHTSA. This raises a concern as to whether Fleetwood Enterprises filed the 573 Defect Report in a timely manner.



DOT AUTO SAFETY HOTLINE  
888-DASH-2-DOT  
888-927-4268

- (3) Fleetwood's October 29, 2003 Part 573 Defect Report states that the affected product was manufactured between January 4, 2002 and May 2003. Fleetwood has identified three wheel separation incidents (Fleetwood s/n 23-07135, 42-81301, and 65-94779) that have occurred in vehicles manufactured during or after May 2003, the date by which Fleetwood should have implemented corrective actions in their wheel assembly and wheel mounting nut torque processes.
- (4) The incident summary lists eleven wheel separations that have occurred since July 2003. Wheel separations that have occurred after the May 2003 bulletins were sent raise concerns as to whether Fleetwood has outlined effective corrective action and/or whether owners were provided sufficient information to elicit the appropriate owner response.

In order for my staff to evaluate this issue, certain information is requested.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicle:** all "Travel Trailer and Fifth Wheel" vehicles manufactured by Fleetwood Enterprises since January 1, 2000 and sold or leased in the United States.
- **Part 573 Report:** the report submitted by Fleetwood on October 29, 2003, to Mr. K. N. Weinstein, Associate Administrator for Safety Assurance, NHTSA, citing 49 CFR 573, and containing information with respect to Fleetwood's decision that there is a defect relating to motor vehicle safety in certain model year trailers manufactured by Fleetwood Enterprises
- **Subject components:** the wheels, brake drums or brake rotors, hubs, wheel mounting studs, and/or wheel mounting nuts installed in subject vehicles
- **Fleetwood Enterprises ("Fleetwood"):** all of its past and present officers and employees, whether assigned to its principal 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 to a consultant) by or under the control of Fleetwood (including all business units and persons previously referred to), who are or, in or after 2000 were involved in any way with any of the following related to the alleged defect in the subject vehicles:
  - 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.
- **Alleged defect:** loosening or separation of the wheels
  - **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 non-identical 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 non-identical 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 the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.
  - **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and

"warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect and determine whether the part 573 Report was filed late, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Fleetwood has previously provided a document to ODI, ODI requests that Fleetwood produce it again within the context of Fleetwood's response to this request. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and 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.

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 information was gathered.

To the extent possible, provide the requested information in Microsoft Access 2000 electronic format.

#### POPULATION INFORMATION

1. Identify by model, model year, and manufacturing location, the number of subject vehicles (i.e. Travel Trailer and Fifth Wheel vehicles) that Fleetwood has manufactured for sale or lease in the United States since January 1, 2000.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER ONE - PRODUCTION DATA." See Enclosure, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

#### WHEEL END COMPONENT INFORMATION

2. For each vehicle identified in response to Request No 1, provide a table that identifies
  - (a) the VIN
  - (b) the number of trailer axles installed in the vehicle
  - (c) the manufacturing or assembly site at which the wheels were installed to the vehicle
  - (d) the Gross Axle Weight Rating for each of the rear axles installed in the vehicle
  - (e) Fleetwood's part number for the wheels installed
  - (f) the supplier of the wheels installed
  - (g) the supplier's part number for the wheels installed
  - (h) a brief description of the material composition of the wheels installed

(i) the nominal diameter of the mounting holes, the number of holes, mounting circle, and offset for the wheels installed

(j) state whether the wheel is hub piloted or stud piloted

(k) Fleetwood's part number for the brake assembly installed

(l) the supplier of the brake assembly installed

(m) the supplier's part number for the brake assembly installed

(n) the part number of the brake drum or rotor installed

(o) the supplier of the brake drum or rotor installed

(p) the supplier's part number for the brake drum or rotor installed

(q) Fleetwood's part number for the axle assembly installed

(r) the supplier's part number for the axle assembly installed

(s) Fleetwood's part number(s) for the wheel mounting studs installed

(t) the supplier's part number(s) for the wheel mounting studs installed

(u) a description of the nominal diameter, thread count and thread type of the wheel mounting studs installed

(v) a description of the material composition (material and grade) of the wheel mounting studs installed

(w) a description of any plating or coatings applied to the wheel mounting studs installed

(x) Fleetwood's part number for the wheel mounting nuts installed

(y) the supplier's part number for the wheel mounting nuts installed

(z) a description of the configuration of the wheel mounting including nominal diameter, height, thread count, thread type, description of nut profile at the contact point with the wheel,

(A) a description of the material composition (material and grade) of the wheel mounting studs installed

(B) a description of any plating or coatings applied to the wheel mounting nuts installed

Provide the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO – VEHICLE SPECIFICATIONS AND WHEEL END COMPONENT INFORMATION." See Enclosure, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Note: Fleetwood may provide the above requested information in summary format based on the wheel end component information if the information can be summarized in logical sets or families of vehicle models, production periods, of other parameters that contain identical wheel end components.

3. Provide a list of vehicles, if any, in which Fleetwood installed any components or materials in the wheel end assembly other than those listed in response to Request No

2 including but not limited to wheel spacers, anti-rust agents, lubricants, or the like. Identify and describe the "other components" identified and describe the vehicle configurations, facilities, or time periods in which these components or materials had been installed or applied.

4. For each logical grouping or family that share common wheel end components (wheel, hub, brake drum or rotor, wheel mounting stud and wheel mounting nut) identified in response to Request No. 2, provide the approximate clamp strength of the wheel end joint and identify the method by which Fleetwood established the clamp strength (calculation, published information, vendor, measurement, etc.).

For each logical grouping or family that share common wheel end components (wheel, hub, brake drum or rotor, wheel mounting stud and wheel mounting nut) identified in response to Request No. 2, provide the estimated clamp requirements of the wheel end joint, a brief description of vehicle maneuver that was considered in arriving at the stated clamp requirements (e.g. static, cornering, braking, etc.) and the method by which Fleetwood established the clamp requirements (calculation, published information, vendor, measurement, etc.).

5. For each supplier identified in response to Request No. 2., identify the company name, address, contact name, and phone number.

#### COMPONENT CAPACITY INFORMATION

6. For each wheel, hub, and axle assembly identified in response to Request No. 2, provide a table that lists the Gross Axle Weight Rating (GAWR) for that component, a description of the basis for the GAWR rating value provided (e.g. internal testing at Fleetwood, supplier's certification or approval, supplier's published component ratings, etc.), and all application or compatibility (with other components) restrictions for the listed components.

#### COMPLAINT INFORMATION

7. State the number of each of the following, received by Fleetwood, or of which Fleetwood is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
  - a) Consumer complaints, including those from fleet operators;  
Field reports, including dealer field reports;
  - b) Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
  - c) Reports involving a fire, based on claims against the Fleetwood involving a death or injury, notices received by Fleetwood alleging or proving that a death or injury

was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;

- d) Property damage claims;
- e) Third-party arbitration proceedings where Fleetwood is or was a party to the arbitration; and,
- f) Lawsuits, both pending and closed, in which Fleetwood is or was a defendant or codefendant.

For subparts "a" through "e," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "g," provide a summary description of the alleged problem and causal and contributing factors and Fleetwood's assessment of the problem, with a summary of the significant underlying facts and evidence.

For items "f" and "g," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER SEVEN – COMPLAINT INFORMATION." See Enclosure, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

8. Separately, for each item (complaint, report, claim, notice, or matter) identified in response to Request No. 7 above, state the following information:
  - a) Fleetwood's file number or other identifier used;
  - b) The category of the item, as identified in Request No. 1 (i.e., consumer complaint, field report, etc.);
  - c) Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - d) Vehicle's VIN;
  - e) Vehicle's make, model and model year;
  - f) Vehicle's mileage at time of incident;
  - g) Incident date;
  - h) Report or claim date;
  - i) Whether a crash is alleged;
  - j) Whether property damage is alleged;
  - k) Number of alleged injuries, if any; and
  - l) Number of alleged fatalities, if any.

9. Produce copies of all documents related to each item within the scope of Request No. 7 and No. 8. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Fleetwood used for organizing the documents.

#### WARRANTY INFORMATION

10. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Fleetwood to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a) Fleetwood's claim number;
- b) Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c) VIN;
- d) Repair date;
- e) Vehicle mileage at time of repair;
- f) Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g) Labor operation number;
- h) Problem code;
- i) Replacement part number(s) and description(s);
- j) Concern stated by customer; and
- k) Comment, if any, by dealer/technician relating to claim and/or repair.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TEN - WARRANTY INFORMATION." See Enclosure, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

11. Describe in detail the search criteria used by Fleetwood to identify the claims identified in response to Request No. 10, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles.

Describe any extended warranty coverage option(s) related to the alleged defect that Fleetwood offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

**ENGINEERING DRAWINGS AND EXEMPLAR COMPONENTS**

12. Provide an engineering drawing of each wheel, brake drum, brake rotor, hub, wheel mounting stud, and wheel mounting nut listed in response to Request No. 1.
13. Provide a sample of each of the following components: (1) an aluminum wheel (2) a wheel hub assembly (with wheel mounting studs installed) (3) a complete set of wheel mounting nuts (4) a brake drum or brake rotor. Each sample should be clearly labeled with Fleetwood's identifying part number.

These individual components should consist of compatible components representative of one of the wheel end assemblies installed in the vehicles listed in the incident summary provided in response to Request No 25.

ODI requests Fleetwood to notify ODI when the components are ready for shipment at which time ODI will provide the address to which the components should be shipped.

14. Describe all modifications or changes made by, or on behalf of, Fleetwood in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
  - a) The date or approximate date on which the modification or change was incorporated into vehicle production;
  - b) A detailed description of the modification or change;
  - c) The reason(s) for the modification or change;
  - d) The part numbers (service and engineering) of the original component;
  - e) The part number (service and engineering) of the modified component;
  - f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
  - g) When the modified component was made available as a service component; and,
  - h) Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Fleetwood is aware of which may be incorporated into vehicle production within the next 120 days.

Note: All changes intended to improve the integrity and durability of the wheel mounting system that were implemented in response to wheel separation and wheel loosening should be clearly identified as such.

15. Describe all requested deviations from conformance to specifications received from all sources, the affected vehicle production, and provide a summary of the disposition for each of the requested deviations for the wheels, hubs, brake drum or rotor, wheel

mounting studs, and wheel mounting nuts installed in the vehicles identified in response in Request No. 1.

#### STEEL WHEEL TECHNICAL INFORMATION

16. Provide an engineering drawing of a representative wheel end assembly that incorporates a steel wheel.
17. Provide a copy of the wheel mounting and wheel mounting nut torque procedure(s) used to install steel wheels onto subject vehicles.

If Fleetwood uses more than one wheel mounting and wheel mounting nut torque procedure for steel wheels installed in the vehicles listed in response to Request No. 1, provide a copy of each procedure and describe the vehicle configuration or other parameter that dictate when each procedure is to be used.

Include a copy of (A) the procedures used at the initial wheel mounting; (B) the procedures used for all torque, re-torque or torque checks performed on the wheel mounting nuts during and after the initial wheel mounting; (C) the procedures used for all re-torque or torque checks conducted immediately prior to, during, or after delivery of the vehicle to the dealer; (D) the recommended torque procedures and intervals that Fleetwood recommends that the delivering dealer perform prior to delivering a new vehicle to the purchaser; (E) the recommended torque procedures and intervals that Fleetwood recommends that the vehicle owner perform; (F) all other wheel mounting nut torque, retorque, or checking procedures issued or recommended by Fleetwood.

Describe how Fleetwood determined the (1) original and (2) all subsequent specified torque values for the wheel ends using steel wheels.

Identify all tests that have been conducted by Fleetwood, Fleetwood's suppliers, and/or sub-contractors to validate the integrity and durability of the torque values specified.

18. Describe all changes in the wheel mounting and wheel nut torque procedures listed in response to Request No. 17 for steel wheels, the date that the change was implemented, and the reason for the change.
19. Provide a copy of the manufacturing quality control plan, including frequency and method, that Fleetwood uses to assure the correct mounting of the steel wheel to the hub and for validating that the wheel mounting nuts have been correctly installed and torqued.

#### ALUMINUM WHEEL TECHNICAL INFORMATION

20. Provide an engineering drawing of representative wheel end assembly that incorporates an aluminum wheel.
21. Provide a copy of the wheel mounting and wheel mounting nut torque procedure(s) used to install aluminum wheels onto subject vehicles.

If Fleetwood uses more than one wheel mounting and wheel mounting nut torque procedure for aluminum wheels installed in the vehicles listed in response to Request No. 1, provide a copy of each procedure and describe the vehicle configuration or other parameter that dictate when each procedure is to be used.

Include a copy of (A) the procedures used at the initial wheel mounting; (B) the procedures used for all torque, re-torque or torque checks performed on the wheel mounting nuts during and after the initial wheel mounting; (C) the procedures used for all re-torque or torque checks conducted immediately prior to, during, or after delivery of the vehicle to the dealer; (D) the recommended torque procedures and intervals that Fleetwood recommends that the delivering dealer perform prior to delivering a new vehicle to the purchaser; (E) the recommended torque procedures and intervals that Fleetwood recommends that the vehicle owner perform; (F) all other wheel mounting nut torque, retorque, or checking procedures issued or recommended by Fleetwood.

22. Provide a copy of the manufacturing quality control plan, including frequency and method, that Fleetwood uses to assure the correct mounting of the aluminum wheel to the hub and for validating that the wheel mounting nuts have been correctly installed and torqued.

Describe how Fleetwood determined the (1) original and (2) all subsequent specified torque values for the wheel ends using aluminum wheels.

Identify all tests that have been conducted by Fleetwood, Fleetwood's suppliers, and/or sub-contractors to validate the integrity and durability of the torque values specified.

23. Describe all changes in the aluminum wheel mounting and wheel nut torque procedures listed in response to Request No. 21 for aluminum wheels, the date that the change was implemented, and the reason for the change.
24. Describe all modifications or changes made by, or on behalf of, Fleetwood in the design, material composition, manufacture, quality control, supply, or installation of the subject components, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
  - a) The date or approximate date on which the modification or change was incorporated into vehicle production;
  - b) A detailed description of the modification or change;

- c) The reason(s) for the modification or change;
- d) The part numbers (service and engineering) of the original component;
- e) The part number (service and engineering) of the modified component;
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g) When the modified component was made available as a service component; and,
- h) Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Fleetwood is aware of which may be incorporated into vehicle production within the next 120 days.

### FIELD RETURN INFORMATION

25. Provide a list that identifies (1) each of the reported wheel separation incidents that has occurred in vehicles identified in response to Request No. 1 whether the incident occurred in transit between Fleetwood and the selling dealer or after having been placed in service by the vehicle purchaser; (2) all of the wheel components (including but not limited wheels, wheel mounting nuts, wheel mounting studs, hub, and brake drum or brake rotor) that have been returned to Fleetwood or to Fleetwood's suppliers, contractors, consultants, etc.; (3) the current location of the retained returned components (4) the name and phone numbers of the custodian of the retained components.

If no components were returned from a listed incident, so state. If components were returned and later scrapped, so state and provide the approximate date and location that the returned components were scrapped.

26. Provide a copy of all inspection reports conducted by Fleetwood, Fleetwood's suppliers, and/or sub-contractors on returned wheel end components including but not limited to wheels, hubs, brake drums or rotors, wheel mounting studs and wheel mounting nuts listed in response to Request No 25.
27. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Fleetwood. For each such action, provide the following information:
- (a) Action title or identifier;
  - (b) The actual or planned start date;
  - (c) The actual or expected end date;
  - (d) Brief summary of the subject and objective of the action;
  - (e) Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
  - (f) A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

28. Describe the methods that Fleetwood used to deliver the subject vehicles to the respective selling dealer (i.e. are all subject vehicles shipped in similar manner or are various shipping methods such as direct towing, rail, flat-bed trailer, etc. used?). Provide a copy of all analysis that Fleetwood has conducted to assess the effect of the delivery method on wheel separations that have occurred in the subject vehicles.

### NOTICES

29. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Fleetwood has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Fleetwood is planning to issue within the next 120 days.

### CHRONOLOGY

30. Provide a chronology of all events leading up to and explain in detail all bases on which Fleetwood decided to file its Part 573 Report. Describe in detail the procedures followed and actions taken by Fleetwood in reaching the decision that there was a defect and state the date on which anyone in Fleetwood first recognized that the subject defect likely existed. If the decision to submit a 573 Report was made after a presentation to a committee or other Fleetwood organizational unit, identify that committee/unit and all of its members, and state the date on which the responsible person (identify) decided to present the matter involving the subject defect to the committee and the data or dates on which the issue of the subject defect was brought before the committee. Separately identify the individual(s) responsible for making the formal Fleetwood corporate decision that the subject defect exists.

Produce a copy of all documents that are relevant to the above request (No. 30).

31. Provide a chronology of all events leading up to and explain in detail all bases on which Fleetwood decided to issue its dealer and customer notifications in April and May 2003. Describe in detail the procedures followed and actions taken by Fleetwood in reaching the decision to issue the notifications. If the decision to issue the notifications was made after presentation to a committee or other Fleetwood organizational unit, identify that committee/unit and all of its members, and state the

date on which the responsible person (identify) decided to present the matter to the committee and the date or dates on which the matter was brought before the committee. Separately identify the individuals(s) responsible for making the formal Fleetwood corporate decision to issue the notifications.

Produce a copy of all documents that are relevant to the above request (No. 31).

32. Provide a chronology of all events and explain in detail any investigation that Fleetwood undertook in regard to each type of complaint information described in information request No. 7. Describe in detail the procedures followed and actions taken by Fleetwood in receiving and investigating the complaint information. Describe the procedures in place to receive complaint information. If there was an engineering group or organizational unit that reviewed and investigated the complaint information, then identify that group/unit and all of its members, and state the date on which the group/unit began its review and investigation. Explain the process of how the group/unit reached each decision to take action in regard to the complaint information, and the date on which each action was taken. If the decisions to take action were made by another individual or committee, then identify that individual or committee, and the date or dates on which each decision was brought before the individual or committee.

Produce a copy of all documents that are relevant to the above request (No. 32).

33. Provide a chronology of all events and explain in detail any investigation that Fleetwood undertook in regard to each type of warranty information described in information request No. 9. Describe in detail the procedures followed and actions taken by Fleetwood in receiving and investigating the warranty information. Describe the procedures in place to receive warranty information. If there was an engineering group or organizational unit that reviewed and investigated the warranty information, then identify that group/unit and all of its members, and state the date on which the group/unit began its review and investigation. Explain the process of how the group/unit reached each decision to take action in regard to the warranty information, and the date on which each action was taken. If the decisions to take action were made by another individual or committee, then identify that individual or committee, and the date or dates on which each decision was brought before the individual or committee.

Produce a copy of all documents that are relevant to the above request (No. 33).

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 request reports and the production of things. It constitutes a new request for information. 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.)

Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond to ODI information requests.

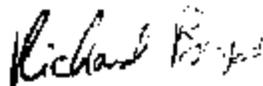
If Fleetwood cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Fleetwood does not submit one or more requested documents or items of information in response to this information request, Fleetwood must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Fleetwood's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by January 19, 2004. Please refer to RQ03-009 in Fleetwood's response to 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) 366-4933 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 an extension has been granted.

If Fleetwood 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, Fleetwood must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Fleetwood 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.

If you have any technical questions concerning this matter, please call Mr. Tom Bowman of my staff at (202) 366-6961.

Sincerely,



Richard Boyd, Chief  
Medium and Heavy Duty Vehicle Division  
Office of Defects Investigation

Enclosure 1, one CD ROM titled Data Collection Disc

