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OFFICE OF
DEFECTS INVESTIGATION

February 18, 2004

Mr. Kenneth N. Weinstein
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

04V-084 ① of ②

Subject: Notice of Safety Defect Pursuant to 49 CFR Part 573

Dear Mr. Weinstein:

Workhorse Custom Chassis L.L.C. has decided that a defect which relates to motor vehicle safety exists in certain of their incomplete vehicle chassis and is furnishing notification to NHTSA in accordance with 49 CFR Part 573, Defects and Noncompliance Reports.

The defect exists in Workhorse Custom Chassis (Workhorse) incomplete Motorhome chassis manufactured with Bosch ZOPS brake calipers. All the incomplete Motorhome chassis were built between August 10, 2000 and June 29, 2002. Incomplete vehicle chassis manufactured after that date did not have the Bosch ZOPS brake calipers. Only W22 and W20 Workhorse incomplete Motorhome Chassis are affected by this defect. The defective part in question, the Bosch Zero Offset Pin Slide (ZOPS) was manufactured by Robert Bosch Corporation, 2800 South 25th Avenue, Broadview, Illinois 60155-4594.

Workhorse manufactured 9,040 vehicles with the Bosch ZOPS brake caliper. Workhorse believes that somewhere between 1 and 1.5% of its vehicles may contain the defect in question.

While the exact reason for the defect is still under investigation, it appears that the mobility of the slide in the caliper has been reduced or is subject to binding which leads to performance issues such as overheated brake components and potentially fire, burn, or smoke incidents. Workhorse is aware that NHTSA has discussed this issue with Bosch and has knowledge of the issue.

On July 11, 2002, NHTSA requested information from Workhorse regarding "alleged overheating front brakes resulting in increased stopping distances in vehicles manufactured or equipped with the Zero Offset Pin Slide (ZOPS) disk brake calipers manufactured by Robert Bosch Corporation." Workhorse responded to the Request for Information on August 26, 2002. At that time it was decided that the number of incidents involving the ZOPS brake calipers were

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few in number and of little concern to Workhorse. Because Workhorse was aware that the investigation was continuing against Bosch and subsequently upgraded to an Engineering Analysis, Workhorse continued to monitor its warranty claims regarding the ZOPS brake calipers. Periodic review of the brake claims indicated that the numbers were increasing, but Workhorse believed that the numbers were still within an acceptable rate, based on the 0.5% rate communicated to Workhorse by NHTSA. In December 2003, the rates had increased to a level, where Workhorse believed that more extensive investigation was necessary. On January 15, 2004, detailed discussions were held with Richard Boyd, Office of Defect Investigations, and more information regarding the nature of the problem was learned. On February 11, 2003, the available information was presented to Dave Olsen, President of Workhorse, and he directed that a defect recall be conducted.

Workhorse intends to establish a program for remedying the defective ZOPS brake calipers in a procedure similar to that set forth by Bosch in their discussions with NHTSA. The exact date of sending out notifications is not known at this time, but we will notify you as soon as the date is determined.

Workhorse has been working with its customers during the time of the Bosch investigation. It believes that it has been providing reimbursement under warranty claims in those cases where problems with calipers have been raised. The brake calipers in question were under warranty, and that warranty is being honored by Workhorse.

Copies of communications to dealers and customers will be provided to you shortly. Workhorse has assigned the following campaign number to this matter 50401-C.

Sincerely,

Dave Bigg

Certification and Compliance
(765) 964 2364

Concur:

John Buttrey

Vice President Engineering