



Fleetwood Enterprises, Inc.  
Recreational Vehicle Group  
Engineering and Compliance  
2970 Myers Street, P.O. Box 7638  
Riverside, California 92513-7638

February 23, 2004

Richard Boyd, Chief  
Medium and Heavy Duty Vehicle Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, DC 20590

Re: NVS-2144b, RQ03-009, Dated November 25, 2003, copy attached (attachment i)  
CD ROM titled Data Collection Disc (attachment ii)  
Data Collection Disc screen print (attachment iii)  
ODI opening resume, dated November 21, 2003 (attachment iii)

Dear Mr. Boyd,

This letter and attachments have been prepared in response to NHTSA RQ03-009 received originally by Fleetwood Enterprises via facsimile transmission on November 25, 2003 which seeks to clarify certain aspects of the Defect Information Report that Fleetwood Enterprises, Inc. filed on October 29, 2003.

Please note that the Data Collection Disc (CD ROM) format was determined to be inconsistent with the NHTSA requests found in the subsequent written text. Consistent with NHTSA's offer to provide a compatible format for data presentation, Fleetwood decided to present the electronic data requested on CD ROM using Microsoft Excel. Microsoft Excel should be a readily accessible format and allow NHTSA easy access to the data presented.

Fleetwood has based the responses upon a search of records at the facilities of Fleetwood Enterprises, or at subsidiary locations, where documents of the type that appear to be called for by the request can reasonable be expected to be found.

In completing these searches, it was first necessary to interpret the requests. Once the search was completed, documents were forwarded for review and these documents provide the basis for the responses contained in this reply.

The search that was conducted did not involve all personnel or offices of Fleetwood and its subsidiaries. Such a broad search would be unlikely to produce any significant additional information, because in the ordinary course of business, information of this type is transmitted to the locations which have been searched. In addition, such a search could be extremely time-consuming and expensive.

Additionally, the search described above was conducted subsequent to receipt of your letter and should have resulted in the identification of information received or generated up to that time. However, it is possible that additional responsive information may have been received or generated between the time the search was

completed and the date of this response. Any such information has not been included. Please advise if you require more specific information about the nature or the scope of the search that we made.

The following (with attachments) contain responses to the 33 requested items (per above referenced NHTSA attachments received).

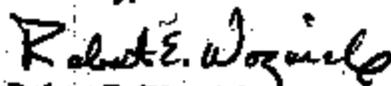
Mr. Boyd, we trust this satisfies your concerns and demonstrates Fleetwood's commitment to customer safety and satisfaction and that Fleetwood fully understands and follows the involved NHTSA regulations. I would like to state that the subject voluntary recall was initiated as a result of several discussions with Mr. Bowman of NHTSA and his concern that improper torque may have been applied at the manufacturing facilities. This was not something we initially considered. We have since concluded that the initial torque applied at the manufacturing facilities was not a primary cause of the wheel separations. Rather, there are numerous other factors involved that can contribute to torque loss during the initial break-in period of the wheel and hub attachment mechanisms. These factors include the nature and characteristics of aluminum versus steel, what is typically referred to as gasket creep, embedment relaxation, stress relaxation, vibration loosening, and numerous other variables that affect the relationship between wheel/hub torque and preload.

As previously stated, we originally debated whether to treat this matter as a field notification campaign, or a voluntary recall. It was decided to do the field notification campaign based on a very similar Ford Motor Company field notification campaign, and due to the timing involved as well as our lack of a definitive cause for the separations other than the customer's failure to recheck torque and maintain as necessary. Our analysis of field data, field incidents, and product information led us to conclude the loss of initial torque was due to some, or all of, the above mentioned factors during the initial break-in period, as well as, the possible failure of the transporters and dealers to check the lug nut torque and torque as necessary prior to delivery to customers. Also, the subsequent failure of customers to do the same, was believed to have contributed to these events.

We continue to believe these factors were the primary reason for the separations. Because of the continued requirement for customers to be aware of the necessity to check lug nut torque, and to check and torque as necessary, we believe the field notification campaign was a success and we support our organization on the decision to issue the field notification campaign based on the information supplied to us at the time and to date.

Fleetwood trusts that the attachments in response to this Recall Query will meet NHTSA requirements and I look forward to the opportunity to meet with you in the following weeks to more fully explain our position and the reasonings behind our decisions.

Sincerely,



Robert E. Wozniak  
Director - Engineering & Compliance  
Recreational Vehicle Group

Cc: Don Lee