

January 24, 2007

VIA E-MAIL
RECEIPT CONFIRMATION REQUESTED

07V-022
(2 pages)

Mr. George H. Person
National Highway Traffic Safety Administration
Office of Defects Investigation
400 7th Street, S.W. NSA-11
Washington, DC 20590

Re: Damon Corporation
Defect and Non-Compliance Report

Dear Mr. Person:

Damon Corporation ("Damon") has identified a non-conformance to FMVSS 108 Lamps, reflective devices, and associated equipment. Certain 2002 through 2007 model year motorhomes were built without the required amber intermediate side reflex reflectors and the red rear reflex reflectors as required by FMVSS 108.

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, we are hereby notifying the National Highway Traffic Safety Administration that certain motorhomes manufactured by Damon were built without the red rear reflex reflectors and within that group, several models did not have the amber intermediate side reflex reflectors as well.

- A. Recall Population and Vehicle Identification. The motorhomes built with the nonconformance are as follows:

<u>Model Name</u>	<u>Model Years Affected</u>	<u>Reflectors Missing</u>
Ultrasport	2002, 2003, 2004, 2005	Rear
Astoria	2006, 2007	Rear
Escaper	2004, 2005	Rear and Side
LX 400	2004, 2005	Rear and Side
Tuscany	2006, 2007	Rear and Side
Intruder	2003, 2004, 2005	Rear
Challenger	2006, 2007	Rear

The total number of motorhomes subject to this recall campaign is 2618.

- B. Description of Defect. All of the motorhomes subject to this recall campaign were built without the red rear reflex reflectors. On certain models, the motorhomes were also built without the amber intermediate side reflex reflectors.

- C. Basis for Determining that a Defect Exists. Damon was conducting an internal standards compliance audit and discovered this non-conformance.

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- D. Remedying of Defect. The recall campaign to be implemented by Damon to remedy the nonconformance will provide the missing reflectors to the vehicle owner's with instructions on how to apply them. The reflectors have permanent adhesive backing that will require the owner to clean a specified area and press the reflectors in place. Along with the reflectors, detailed instructions and all necessary supplies will be provided. In the event the owner does not feel comfortable in doing this, they will be instructed to take their vehicle to the nearest Damon dealer to have the repair done free of charge.
- E. Owner Notifications. Damon will notify owners of the motorhomes of the non-compliance. Damon will also be sending each owner a kit that contains the missing reflectors and instructions for applying them to their vehicle. The kit will also tell owners that if they are uncomfortable in applying the reflectors, they can contact their local Damon dealer, who will do the repair free of charge. A copy of the Owner's notification letter and all correspondence contained in the repair kit will be forwarded to NHTSA shortly for approval. Damon expects to start notifying owners by March 15, 2007.
- F. Dealer Notifications. Damon will notify all Damon dealers of the non-conformance. A copy of the Dealer's notification letter will be forwarded to NHTSA shortly for approval. Damon expects to start notifying dealers by March 8, 2007.
- G. Quarterly Reporting Requirements. Damon will be filing quarterly reports as required by Part 573.7 of Title 49 the Code of Federal Regulations.
- H. Campaign Number. Damon's internal recall campaign number for this recall is 06-119.

The enclosed information should comply with the NHTSA regulations and satisfy the obligations of Damon with respect to this recall campaign. If you need any additional information regarding the participation of Damon in this recall campaign, please feel free to contact me at 937-596-6849, Ext. 7363.

Sincerely,



David M. Mihalick
Thor Industries
Standards Compliance Manager