



# Dometic

**08E-032**  
**(5 pages)**

April 11, 2008



**VIA CERTIFIED MAIL, Ret. Rec. Req.**

Mr. Dan Smith  
Associate Administrator of Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE  
Washington, DC 20590

Dear Mr. Smith:

Please find enclosed a Notification of Defect which Dometic Corporation is submitting pursuant to 49CFR, Part 573.6.

Please contact me if you have any questions or if you require additional information at

We are continuing the preparation of media documents for your approval and the acquisition of the customer, dealer, and OEM lists for this population of products. The customer, dealer, and OEM lists will be submitted under application and request for confidentiality to your lead counsel as soon as these are completed.

The remedy identified in the original recall 06E076 will be employed for this recall expansion. Only the serial numbers for these units will be different, as the model numbers are all the same. If you elect to identify a new and second recall campaign for this additional population of refrigerators, please notify us of the new campaign number as soon as possible so that it can be added to the instructions for remedy kits and the repair service claim card that each customer **must** fill out and return when their refrigerator is serviced. This will enable us to effectively place the remedy and repair for our customers on an available status within two-to-three weeks of this notification.

Thank you for your consideration.

Respectfully,

Patrick N. McConnell

Dometic Corporation

Director Engineering, Product Safety, & Standards

RECEIVED  
2008 APRIL 15  
OFFICE OF DEFECTS INVESTIGATION  
RECALL MGMT DIV. □

- cc: Mr. John Waters, Dometic Corporation (via email)
- Mr. Brad Sargent, Dometic Corporation (via email)
- Mr. Kenth Bengtsson, Dometic Corporation (via email)
- Mr. Doug Dieterly, Esq, Barnes and Thornburg (via email)
- Mr. Richard Paulen, Barnes and Thornburg (via email)

## POTENTIAL DEFECT NOTIFICATION

Dometic Corporation, a supplier of original equipment for the manufacturers of recreation vehicles has determined that a potential defect may exist in the items of motor vehicle equipment listed below. Dometic is submitting this notification of a potential safety related defect to the National Transportation Safety Administration in accordance with the applicable provisions of 49 CFR Part 573.

Dometic Corporation ("Dometic") is a Delaware corporation with its principal place of business at 2320 Industrial Parkway, Elkhart, Indiana 46515. The Dometic products affected by this notice were manufactured by Dometic AB, a Swedish company. The registered agent for Dometic Corporation and Dometic AB is Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.

The affected Dometic products which may contain a potential defect are two-door refrigerators manufactured between June 1 of 2003 and September 30 of 2006. The potentially affected refrigerators have the model designations set forth below:

RM-2652xxxxx  
RM-2662xxxxx  
RM-3662xxxxx  
RM-3663xxxxx  
RM-2852xxxxx  
RM-2862xxxxx  
RM-3862xxxxx  
NDR-1062xxxxx

The possibly affected units will have serial numbers beginning with the following digit combinations:

320xxxxx through 352xxxxx  
401xxxxx through 452xxxxx  
501xxxxx through 552xxxxx  
601xxxxx through 639xxxxx

The potential safety related defect is associated with the cooling unit at the back of the refrigerator cabinet. A fractional percentage of the potentially affected refrigerators have experienced a fatigue crack in the area of the welds between the boiler tube and the heater pockets. A fatigue crack may release a sufficient amount of pressurized coolant solution into an area where an ignition source is present. Under certain limited conditions, the released coolant could ignite and result in a fire.

In order to have a fire, at a minimum, all of the following conditions must exist:

1. The refrigerator must be on and normally operating;
2. The boiler tube must develop a throughway fatigue crack within a specific size range;
3. There must be a release of the cooling solution at a rate which will allow the accumulation of the cooling solution at a concentration and temperature within its range of flammability;  
and
4. There must be ignition source present

**If any of these conditions are not present, a release of the cooling solution will not result in a fire. A boiler fatigue crack with a loss of cooling solution without ignition would result in a non-operational refrigerator and does not present a fire safety issue.**

For the population of product with the models and serial number range shown above from the 20<sup>th</sup> week of 2003 through the 39<sup>th</sup> week of 2006, a potential inconsistent weld process may have contributed to the weld fatigue resulting in a crack of the boiler to heater pocket welds or in the boiler tube on cooling units manufactured or warehoused during this period.

Increased market demand required a new production line with new state-of-the art technology to be introduced and the old production line to be updated with the same new technology between the end of 2005 through January of 2006. This improvement in technology and the streamlining of the production weld process significantly reduced the variability of the boiler to heater pocket seam welds. By September 30, 2006 all quantities of cooling units manufactured prior to the introduction of the new production line technology having the potential safety related defect were used and no longer in inventory.

The list of products shown above are all refrigerators used in the original manufacture of recreation vehicles as well as replacement equipment for recreation vehicles. The total population of these refrigerators potentially containing the defect is 745,574. Dometic estimates that as many as 0.005% may develop weld or boiler fatigue cracks which may result in a fire. There are no incidents of death related to the affected population of Dometic refrigerators.

Dometic has continued to review claims subsequent to NHTSA recall campaign 06E-076 to verify the integrity of the rationale and to make certain that other contributing factors were not present that could cause fatigue on units beyond the original recall population and dates. This review revealed that microscopic cracks could randomly be

found in the boiler metal in the area of the weld between the heater pocket and boiler tube which could release coolant into the area of the burner. These findings have resulted in the preparation of this notice.

The field remedy used for the Dometic recall 06E-076 is equally effective for use on this population of product and will be deployed in identical fashion as previously identified. Dometic, along with conducting their own recall campaign, will participate in the remedy campaigns initiated by the original equipment manufacturers. A list of original equipment manufacturers to whom Dometic has sold the potentially defective refrigerators will be forwarded as Exhibit "A" upon its preparation.

This notice was prepared by and inquiries should be sent to:

Mr. Patrick N. McConnell, Director  
Engineering, Product Safety and Standards  
Dometic Corporation  
509 South Poplar Street  
LaGrange, IN 46761  
Phone: 260/463-2191  
Fax: 260/463-4179

DATED this 11<sup>th</sup> of April 2008

Dometic Corporation

By: Patrick N. McConnell  
Patrick N. McConnell, Director  
Engineering, Product Safety and Standards

## EVENT CHRONOLOGY FOR NHTSA RECALL EXPANSION

Dometic issued a defect notification and initiated recall 06E-076 on August 28, 2006. In Recall 06E-076 Dometic established that under certain limited circumstances a boiler fatigue crack could develop and release coolant which could ignite and result in a fire. These conditions were:

1. The refrigerator must be on and normally operating;
2. The boiler tube must develop a throughway fatigue crack within a specific size range.
3. There must be a release of the cooling solution at a rate which will allow the accumulation of the cooling solution at a concentration and temperature within its range of flammability;  
and
4. There must be an ignition source present

**If any of these conditions are not present, a release of the cooling solution will not result in a fire. A loss of cooling solution without ignition results in a non-operational refrigerator and is not a safety concern.**

During 2006 and 2007 Dometic continued analyzing the defect scenario and developed a field remedy to address and significantly reduce the safety hazard created by the potential defect. In April of 2007 we initiated the recall campaign under NHTSA recall number 06E-076 and have deployed over 177,000 recall remedy kits to the field.

Between the end of 2005 and January 2006 a new boiler weld production line and an update of the old boiler weld production line at the Motala Sweden production facility were implemented for capacity reasons. These new lines incorporated the newest technology from the welding industry, improved capability and reduced process variation through more robust design of the welding arm, using new welding units and processes, with a continuous seam employing better welding rods. Continued analysis reveals that these welding line changes have significantly reduced the risk for inconsistency. By September 30, 2006 all quantities of cooling units manufactured prior to the introduction of the new production line technology having the potential safety related defect is considered to have been used and the inventory cleared.

Although we are certain that the oversized heater identified in recall 06E-076 was a major contributor to boiler tube failures, Dometic's continued review and analysis of product returns and claims, after the defect notification to NHTSA, has shown that it cannot be ruled out that a fatigue crack could develop in the weld or boiler tube. We therefore made a determination to expand our recall for the time period between week 20 of 2003 and week 39 of 2006.