



# Forest River, Inc.

55470 County Road 1, P.O. Box 3030 Elkhart, Indiana 46515-3030 • 574-389-4600 • Fax 574-296-7558

December 22, 2010

Associate Administrator for Enforcement  
National Highway Traffic and Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

RE: Attached 573 recall on R-Pod trailers for 571.108 non-compliance.

Dear Sir or Madam,

Forest River, Inc. has determined that there exists a non-compliance of 571.108 on a travel trailer made by Forest River called the R-Pod and has filed a 573 as required by law.

Forest River, according to part 556 is formally filing a petition for exemption from the Act's notification and remedy requirements on the grounds that the non-compliance is inconsequential as it relates to motor vehicle safety.

#### 556.4(b)(3)

Forest River, Inc. is incorporated in the state of Indiana and the corporate headquarters are located at 55470 C.R. 1 Elkhart, Indiana 46514 mailing address is P.O. Box 3030 Elkhart, Indiana 46515-3030.

#### 556.4(b)(4)

The motor vehicle is a travel trailer named R-Pod. (literature is included) that is built in our Surveyor Division at 2405 Century Drive, Goshen, Indiana 46528 beginning in October of 2008 for a total of 2697 units and our Surveyor Division at 1430 SE Uglow Dallas, OR 97338 beginning in July 2010 for a total of 44 units. All together there are 2,741 units involved.

This trailer is a small compact trailer designed to be pulled behind a mid size car, van or SUV. This trailer's body is seventy seven (77) inches wide and this is where the confusion began. Under 571.108 table IV there are no requirements for clearance lights or marker lights on the rear. Furthermore foot note one (1) states that "the term over all width refers to the nominal design dimension of the widest part of the vehicle, exclusive of signal lamps, marker lamps, outside rearview mirrors, flexible fender extensions, mud flaps, determined with the doors and windows closed, and the wheels in a straight ahead position".

It was determined at the time of the development and prototyping of this product that there were no requirements for clearance lights and rear marker lights because the body was less than 80 inches. There was also an exemption for the fender extensions.

Forest River is seeking exemption from the Act's notification and remedy requirements on the grounds that this is inconsequential as it relates to motor vehicle safety. Also these units are all over the United States and bringing them back to either Indiana or Oregon for repair would be astronomical in cost. There is also the enormous cost to remedy these units at the dealers repair center and the potential of causing deterioration of the product if the remedy is not done correctly.

#### 556.4(b)(5)

Forest River recognizes the error of the interpretation of the standard and has rectified all R-Pods built as of December of 2010 by adding the clearance lights to the fenders, amber in front and red on the rear along with a red reflector on the rear of each fender. We have also added a spoiler to the rear of the unit to house the 3 red rear marker lights indicating the height.

The basis for our petition for exemption is for several reasons.

1. The box of the unit is under the 80 inch width and is properly marked according to table IV of 571.108. The fenders are low on each side of the unit.
2. There are a total of 2,741 units involved and the cost to repair is substantial. Here is a break down of the cost to add the marker lights and the clearance lights.

Marker lights would require the following items:

Roof Spoiler w 3M Hat tape	\$42.65
Adhesive Promoter \$39.27/gal. -.1 gal req.	\$3.93
3/4" LED Clearance Light-Red \$3.82 ea 3 req.	\$11.46
14-2 Green/White 12 gauge wire \$0.11/ft 20 ft req.	\$2.14
Yellow wire nuts .02 ea 10 req.	\$2.20
#8 x 1" Pan Head White Screws \$.01ea 10 req.	\$1.10

Labor to remove aluminum molding on the road  
Side rear, install spoiler, lights and wiring and re-  
Assemble and seal aluminum molding at \$100.00/hr, 1.5 hrs req. \$150.00

Clearance lights require the following items:

Sealed Marker Light – Amber \$.69 ea 2 req.	\$1.38
Sealed Marker Light – Red \$.69 ea 2 req.	\$1.38
Base for sealed marker light \$.41 ea 4 req.	\$1.64
18" Lead wire for sealed marker light \$.39 ea 4 req.	\$1.56
16 gauge DK Green TEW 105c wire \$.03/ft. 24 ft req.	\$8.33
1/4" split black convoluted tubing \$.02/ft 24 ft req.	\$5.58
1/4" plastic loop clamps \$.007 each 10 req.	\$0.70
Insulated WP connector \$.33 ea 4 req.	\$1.32
14" NAT mount Cable Tie \$.04 ea 8 req.	\$3.20
#86 Red Wing Twist-on connection \$.03 ea 1 req.	\$0.03
#8 x 1 Quad Pan SDS Zinc Screw \$.01 ea 12 req.	\$1.20
1/4-14 x 1 Unslotted HWH SDS Zinc Screw \$.02 ea 10 req.	\$2.20

Labor to install, wire and seal lights \$100.00 per hr, 1.5 hours req. \$150.00

Total cost per trailer \$369.87 multiplied by 2,741 trailers equals a staggering \$1,013,813.60 cost for these two divisions. This does not include the shipping cost and postage for the notification. There is also potential of de-lamination and leakage that could result if the aluminum corner molding on the road side is not properly re-installed and sealed.

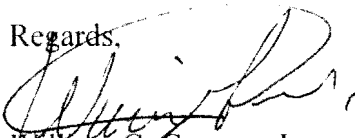
To obtain the strong lightweight structure, the unit is laminated using fiberglass, luaun plywood, polystyrene foam and luaun plywood with a decorator film for the interior. These substrates are all bonded together using a polyurethane adhesive that is applied hot to the luaun plywood. The assembly is then fed into a pinch roller that initiates a close bond. When the polyurethane cools and cures it makes a bond that is stronger than the substrate it is adhered to.

The only draw back is that the luaun plywood substrate will delaminate if it gets wet due to a leak in a seal or extrusion. The RV industry has been unsuccessful in obtaining a light weight, stable and cost effective substitute for Luaun plywood that is not susceptible to de-lamination when it gets wet. If there is a de-lamination the only repair is to completely remove the de-laminated part and replace it with a new one.

Enclosed is a drawing indicating the corrections that have been made to the product to meet the requirements of 571.108.

In closing Forest River believes, as we hope that NHTSA will, the violation is inconsequential to motor vehicle safety. Also the cost to implement the compliance as well as the potential for further failure of the product and the dissatisfaction of the consumer will warrant an exemption from the notification and remedy requirements of the Act.

Regards,



William G. Conway Jr.

Forest River, Inc.

574-534-6913

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# Forest River, Inc.

55470 County Road 1 P.O. Box 3030 Elkhart, Indiana 46515-3030 • 574 389 4600 • Fax 574 296 7558

12-14-2010

Associate Administrator for Enforcement  
National Highway Traffic and Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

Dear Sir or Madam:

Pursuant to 49 CFR part 573, Forest River Inc. P.O. Box 3030 Elkhart, Indian 46515-3030 is submitting this report to NHTSA concerning a recall campaign for non compliance, which is being voluntarily initiated. The specific information is as follows;

**573.6(c)(2)**

Affected vehicles are 2009-2011 model year R-Pod travel trailers built from 10/27/2008 to 11/30/2010.

The recall population was determined from the manufacturing records for the company's manufacturing plants in Goshen Indiana and Dallas, Oregon which produced the affected R-Pod travel trailer.

**573.6(c)(3)**

A total of two thousand seven hundred forty one-(2,741) R-Pod travel trailers are subject to this recall. Specific Vehicle Identification Numbers (VIN) is as follows;

Indiana manufacture R-Pod travel trailer with a starting VIN of 4X4TRP5109L004102 and ending with VIN 4X4TRP71XBL007558.

Oregon manufacturer R-Pod travel trailers with a starting VIN of 4X4TRP716B2004002 and ending with 4X4TRPT21B2004075.

**573.6(c)(4)**

Forest River, Inc. is recalling 100 percent of the VIN numbers identified in the scope.

**573.6(c)(5)**

The R-Pod travel trailer is inconsistent with 49 CFR part 571.108, location of required lighting equipment specifically, the requirements for clearance lights that can be seen from the front and rear indicating t

he design width of the unit and marker lights indicating the height that can be seen from the rear of the trailer.

The R-Pod travel trailer was being developed with a body width of less than 80" the interpreted of table IV of CFR part 571.108 indicated that a unit with a width of less than 80" did not require clearance lights nor marker lights. Foot note (1) indicated that "The term overall width refers to the nominal design dimension of the widest part of the vehicle, exclusive of signal lamps, marker lamps, outside rear view mirrors, flexible fender extensions, and mud flaps, determined with doors and windows closed and the wheels in the straight ahead position". Therefore the marker lights and clearance lights were not installed because of the reference to fenders as part of the exemption.

**573.6(c)(6)**

Forest River decided to conduct this recall after an audit of the manufacturing plants for Federal Motor Vehicle Safety Compliance that was initiated due to a customer complaint to NHTSA and NHTSA's interpretation of 571.108, table IV.

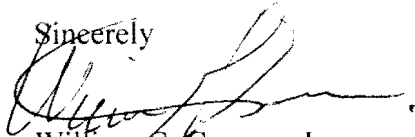
**573.6(c)(8)**

The remedy for the affected travel trailers would involve placing the DOT approved clearance lights on the fender of the trailer indicating the overall design width and a spoiler on the rear as high as applicable to house the marker lights.

Forest River respectively intends to submit a petition for exemption from the notification and remedy requirements of the Act due to the inconsequentiality of the noncompliance as set forth in CFR part 556.

Thank you for your assistance,

Sincerely

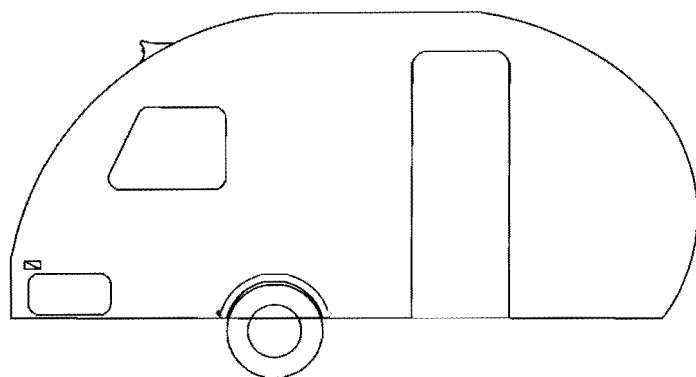


William G. Conway Jr.  
Chief Corporate Engineer  
574-534-6913

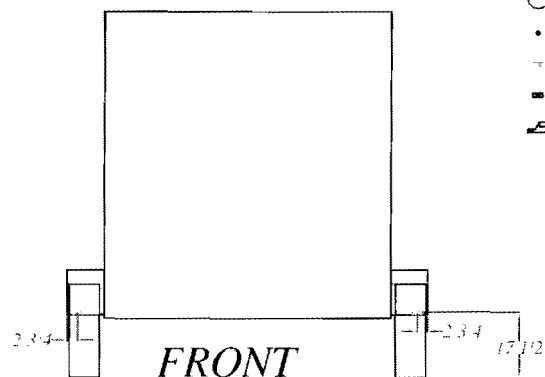
Fax: 574-343-5967

Email: [bconway@forestriverinc.com](mailto:bconway@forestriverinc.com)

# R-POD

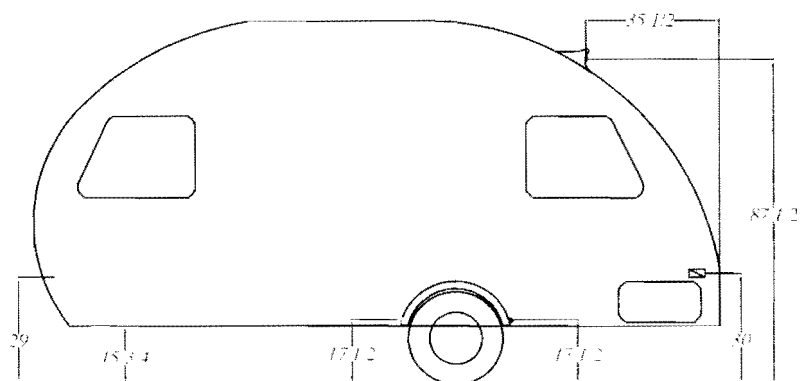


DOOR SIDE

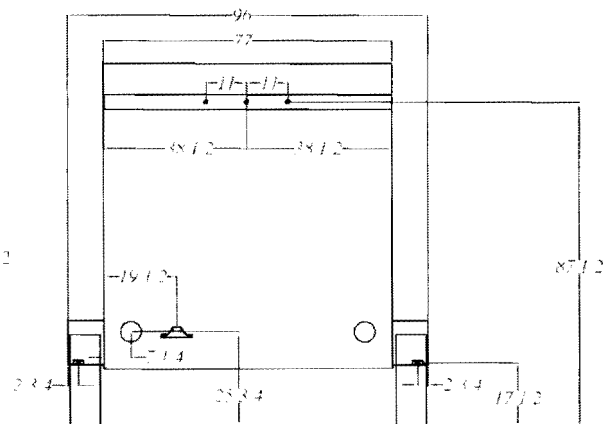


FRONT

- ◻ SAE-AP2 AMBER LENS
- ◻ SAE-AP2 RED LENS
- DOT STAIP 06
- SAE DOT P2 PC 06 RED LENS
- ◻ SAE P2 91 DOT 7 AMBER LENS
- SAE P2 91 DOT 6 RED LENS
- ◻ SAE L-94

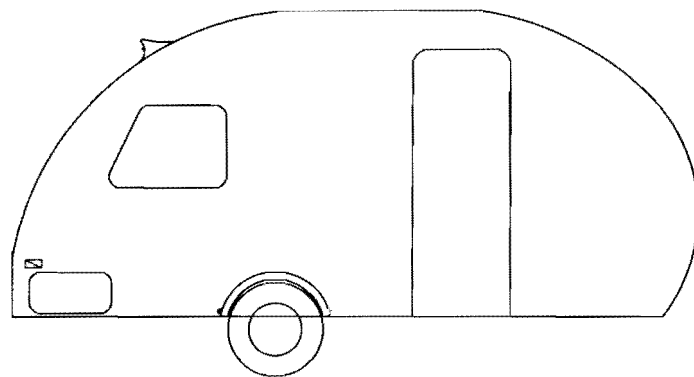


OFF DOOR SIDE

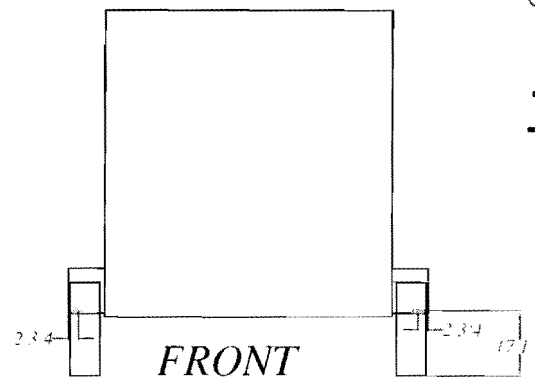


REAR

# R-POD

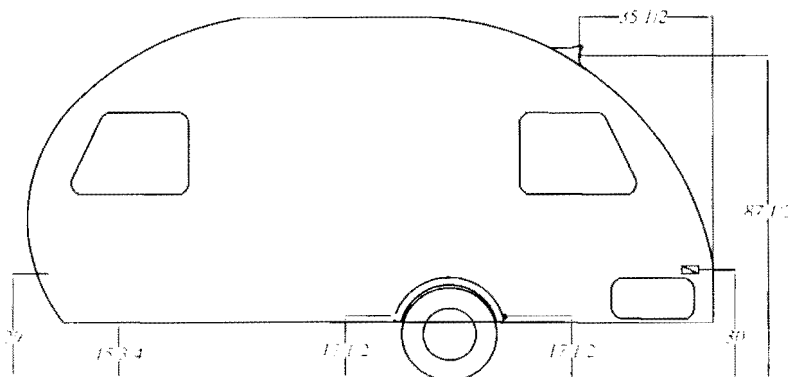


DOOR SIDE

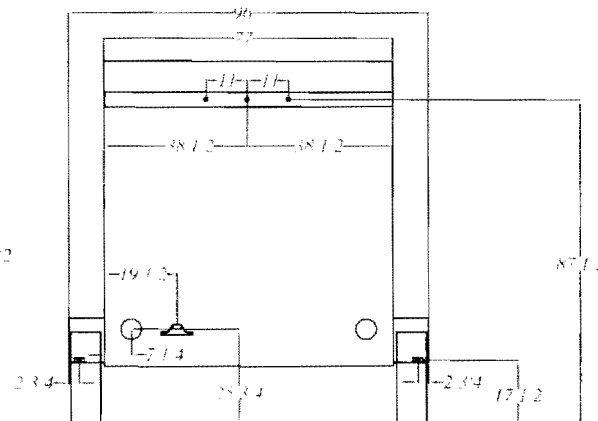


FRONT

- SAE-AP2 AMBER LENS
- SAE-AP2 RED LENS
- DOT STAIP 06
- SAE DOT P2 PC 06 RED LENS
- SAE P2 91 DOT 7 AMBER LENS
- SAE P2 91 DOT 6 RED LENS
- SAE L-94

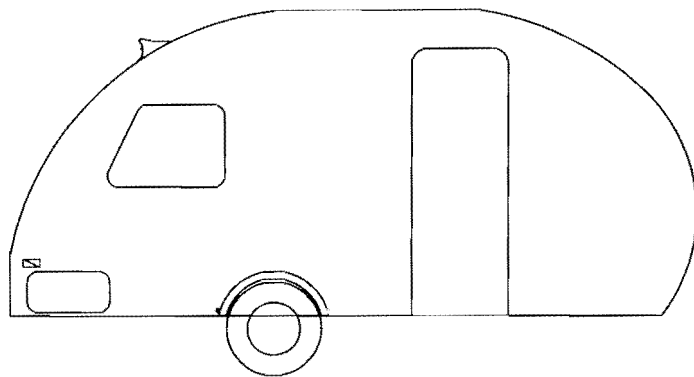


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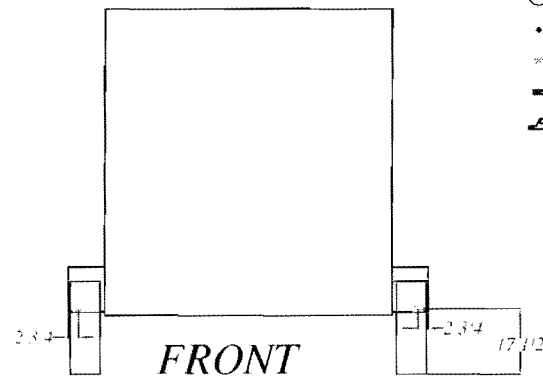


REAR

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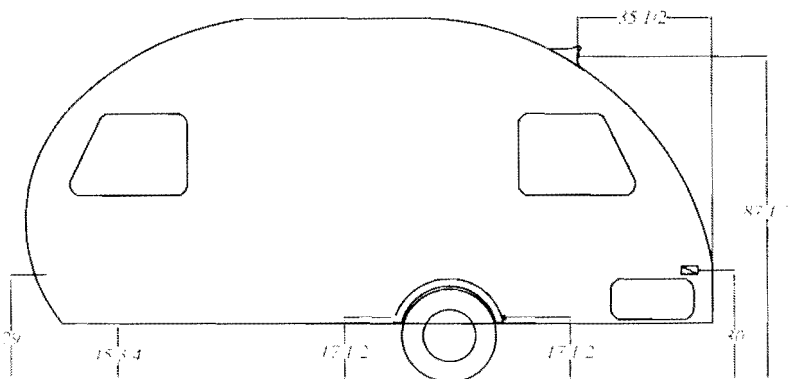


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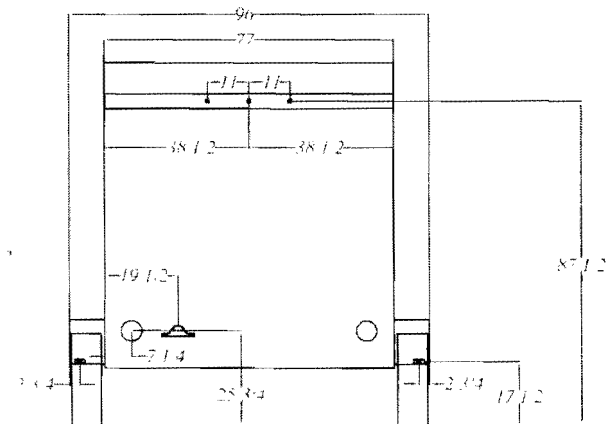


FRONT

- ~ SAE-AP2 AMBER LENS
- ▢ SAE-AP2 RED LENS
- DOT STAIP 06
- SAE DOT P2 PC 06 RED LENS
- \* SAE P2 91 DOT 7 AMBER LENS
- SAE P2 91 DOT 6 RED LENS
- ⏏ SAE L-94



OFF DOOR SIDE



REAR