



PO Box 2000 Goshen, IN 46527

July 31, 2012

**VIA E-MAIL  
RECEIPT CONFIRMATION REQUESTED**

Ms. Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attn: Recall Management Division (NVS-215)  
1200 New Jersey Ave. S.E.  
Washington, DC 20590

Re: Keystone RV Company  
Defect and Non-Compliance Report

Dear Ms. Lewis:

Keystone RV Company (“Keystone”) has decided that a defect which relates to motor vehicle safety exists in the recreational vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

A. Recall Population and Vehicle Identification. The recall population includes the following product brands manufactured by Keystone.

<u>Product Brand</u>	<u>Number of Vehicles</u>
2010 - 2012 Cougar Models 26SAB & 29RES Fifth Wheels Production Dates: 10/5/2009 – 10/24/2011	1012
The total number of vehicles subject to this recall campaign is:	1012

B. Description of Defect. It has been decided that Keystone RV Company has experienced a limited number failures with its bumpers in the population listed above. The bumper carries the spare tire assembly and in some cases the bumper has experienced metal fatigue at the point it is attached to the frame causing the bumper and spare tire to partially or wholly separate from the vehicle. If the bumper fails and separates from the vehicle, there is an increased risk of personal injury and property damage.

Manufacturer: Lippert Components 2703 College Avenue Goshen, Indiana 46528  
Contact: Andrew VanSchoick Director of Service Operations

C. Basis for Determining that a Defect Exists.

June 22, 2012 – Keystone was contacted by ODI – NHTSA regarding spare tire mount integrity. A review of warranty claims received by Keystone revealed 58 complaints of bumper failures in the recall population. Claims were received from May 2010 thru the present time. At least 14 of these failures were the result of

aftermarket items, in addition to the spare tire, being added by the end user and carried on the bumper.

July 17, 2012 After review of all information, Keystone decided to issue a recall.

- D. Remedying of Defect. The remedy is to install a reinforcement kit supplied by Keystone at the bumper attachment point.
- E. Owner Notifications. Keystone will notify the owners of the recreational vehicles by letter beginning in August 2012 pending NHTSA approval. A final copy of the owner letter will also be provided to NHTSA, along with the dealer repair procedures.
- F. Quarterly Reporting Requirements. Keystone will be filing quarterly reports in connection with this recall campaign.
- G. Campaign Number. Keystone's identification code for this recall is 12-178.

If you need any additional information regarding this recall campaign, please feel free to contact me at 574-537-3925.

Sincerely,

Garett Carolus  
Keystone RV Company  
Technical Manager