

Kevin Van Bronkhorst
Director, Product Safety and Compliance
Winnebago Industries, Inc.
13200 Pioneer Trail
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December 2, 2022

Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Winnebago Industries, Inc. – Petition for Inconsequential Noncompliance

Dear Acting Administrator Carlson,

Winnebago Industries, Inc. (“Winnebago”) is submitting this Petition for Inconsequential Noncompliance (“Petition”) in accordance with 49 U.S.C. §§ 30118, 30120 and 49 C.F.R. Part 556. On November 11, 2022, Winnebago submitted a noncompliance report pursuant to 49 C.F.R. Part 573 (“Part 573 Report”) which explained that the turn signals in certain Vista, Sunstar, Journey, Meridian, Forza, Solei, Intent, Tour, Ellipse, Sightseer, Sunova, Brave, Tribute, Destination, and Latitude model vehicles do not meet the effective projected luminous lens area requirements set forth in S6.4.1 and Table IV-a of FMVSS No. 108. The Part 573 Report provides additional details regarding this noncompliance, including the population and production dates of the affected models. A copy of the Part 573 Report is included herewith as Attachment A.

I. FACTUAL AND REGULATORY BACKGROUND

Winnebago, a corporation organized under the laws of the State of Iowa, is a manufacturer of various types of motor vehicles, including motorhomes such as Vista and Sunstar vehicles. Winnebago’s corporate address is 13200 Pioneer Trail, Eden Prairie, MN 55347.

The noncompliance in this matter relates to FMVSS No. 108, which sets forth the requirements for original and replacement lamps, reflective devices, and associated equipment, including effective projected luminous lens area requirements applicable to turn signals.¹ Specifically, Table IV-a in FMVSS No. 108 provides that the minimum effective projected luminous lens area for each turn signal

¹ See 49 C.F.R. § 571.108 S1; S6.4.1. “Effective projected luminous lens area” is defined as “the area of the orthogonal projection of the effective light-emitting surface of a lamp on a plane perpendicular to a defined direction relative to the axis of reference. Unless otherwise specified, the direction is coincident with the axis of reference.” *Id.* at S4.

lamp in multipurpose passenger vehicles with 2,032 millimeters or more in overall width is 7,500 square millimeters.²

NHTSA has explained that the purpose of FMVSS 108 requirements is to reduce traffic accidents by, *inter alia*, “enhancing the conspicuity of motor vehicles on the public roads so that their presence is perceived and their signals understood, both in daylight and in darkness or other conditions of reduced visibility.”³ Further, in a 1990 final rule notice increasing the minimum lens area for wide vehicles from 8 square inches (i.e., 5,161.28 sq mm) to 12 square inches (i.e., 7,741 sq mm), NHTSA explained that the increase in lens area is necessary because wide vehicles “are susceptible to build up of grime” and “an increase in lens area would enhance vehicle conspicuity and contribute to safety.”⁴

In or about late July 2022, Winnebago was informed by a lamp supplier that there was concern regarding the compliance of current turn signals installed in certain Winnebago vehicles with the minimum effective projected luminous area requirements of FMVSS No. 108. Upon investigation and subsequent assessment of the subject turn signals, Winnebago confirmed that the effective projected luminous lens area of turn signals in subject vehicles is 6,361 square millimeters – *i.e.*, 1,139 square millimeters smaller than the required minimum lens area, and submitted the Part 573 Report to NHTSA on November 11, 2022.

II. DESCRIPTION OF THE NONCOMPLIANCE

As noted previously, FMVSS No. 108 requires that the minimum effective projected luminous lens area for each turn signal lamp in multipurpose passenger vehicles with 2,032 mm or more in overall width should be 7,500 square millimeters.⁵ Upon investigation and review, Winnebago determined that the effective projected luminous lens area of turn signals installed on its 2008 – 2023 Model Year Vista, Sunstar, Journey, Meridian, Forza, Solei, Intent, Tour, Ellipse, Sightseer, Sunova, Brave, Tribute, Destination, and Latitude vehicles is 6,361 square millimeters – *i.e.*, 1,139 square millimeters smaller than the required minimum lens area. The turn signals at issue have been in use for more than 15 years, and Winnebago is not aware of any crashes, injuries, customer complaints or field reports in connection with this noncompliance.

III. LEGAL STANDARDS APPLICABLE TO PETITIONS FOR INCONSEQUENTIAL NONCOMPLIANCE

NHTSA has determined that under the National Highway and Motor Vehicle Safety Act (“Safety Act”) and 49 C.F.R. Part 556, NHTSA may consider, in appropriate circumstances, whether an instance of noncompliance with an FMVSS is inconsequential to motor vehicle safety.⁶ Because neither the Safety Act nor 49 C.F.R. Part 556 define “inconsequential,” NHTSA has explained that “the agency determines whether a particular noncompliance is inconsequential to motor vehicle safety based upon the specific facts before it in a particular petition.”⁷ NHTSA has stated that a key question in evaluating

² *Id.* at Table IV-a.

³ *Id.* at S2.

⁴ See *Federal Motor Vehicle Safety Standards; Lamps, Reflective Devices, and Associated Equipment*, 55 Fed. Reg. 20158 (May 15, 1990).

⁵ *Id.* at Table IV-a.

⁶ See *BMW of North America, LLC; Jaguar Land Rover North America, LLC; and Autoliv, Inc.; Decisions of Petitions for Inconsequential Noncompliance*, 84 Fed. Reg. 19,994, 19,996 (May 7, 2019).

⁷ *Id.* at 19,997.

a petition for inconsequential noncompliance is “whether the noncompliance in question is likely to increase the safety risk to individual occupants.”⁸

IV. BASIS FOR WINNEBAGO’S PETITION FOR INCONSEQUENTIAL NONCOMPLIANCE

The sole noncompliance at issue relates to turn signals that are slightly smaller than the required minimum effective projected luminous lens area set forth in FMVSS No. 108. The turn signals are otherwise fully compliant with all applicable performance requirements, including the visibility and photometry requirements under FMVSS No. 108. The turn signals at issue have been in use for more than 15 years, and Winnebago is not aware of any crashes, injuries, customer complaints or field reports in connection with this noncompliance. Thus, Winnebago believes that the turn signals that are slightly smaller than the required minimum lens area are likely to be imperceptible to both vehicle occupants and approaching drivers, and do not have an effect on the conspicuity of the motorhomes on which they are installed.

Furthermore, in increasing the required minimum lens area for turn signals in wide vehicles, NHTSA was concerned about, *inter alia*, the buildup of grime and dirt on turn signals. The turn signals at issue, however, are installed on motorhomes, which are generally well maintained by their owners compared to other classes of wide vehicles. Thus, a slightly smaller turn signals would not reasonably result in a buildup of dirt and grime on turn signals, further alleviating any concern NHTSA had when it first required an increased lens area for turn signals installed on wide vehicles.

In sum, because the slightly smaller turn signals do not affect the conspicuity of the turn signals, would likely not result in the buildup of dirt and grime, and are otherwise fully compliant with all other performance requirements, Winnebago reasonably believes that the noncompliance at issue is inconsequential to motor vehicle safety.

V. CONCLUSION

For the reasons set forth above, pursuant to 49 C.F.R. 556, Winnebago respectfully requests relief from the owner and dealer notification requirements set forth in 49 C.F.R. 577. If you have any questions regarding this Petition, please do not hesitate to contact me at any time, either by e-mail at kvanbronkhorst@winnebagoind.com, or by phone at 952-829-8616.

Sincerely,



Kevin Van Bronkhorst
Director, Product Safety and Compliance
Winnebago Industries, Inc.

⁸ *Id.*

ATTACHMENT A
(Part 573 Noncompliance Report)



Winnebago Industries, Inc.

Vehicle Report

NHTSA ID: 22V839 Transaction ID: 22-001496-28639-11 (Amendment 1)

Required fields indicated with *

Your report has been submitted. Your Transaction No. is 22-001496-28639-11.

Manufacturer: Winnebago Industries, Inc.

PO BOX 152
Forest City IA 50436

[Dale Jorda](#) Product Safety Administrator
641 585 6472,

This is a Noncompliance Report. Filing a petition pursuant to [49 CFR 556](#)

Vehicle Information

Winnebago Vista, Sunstar 2015 - 2021

* **Model Yr. Start:** 2015 * **Model Yr. End:** 2021
 * **Make:** Winnebago
 * **Model:** Vista, Sunstar

Type:
Body Style:
Powertrain:

Production Dates Begin: 01/13/2014
 End: 04/26/2021

Descriptive Information:
 Affected VINs were found thru our production records and Engineering drawing records.

VIN Range(s): Begin: End:

Winnebago Horizon 2013 - 2019

* **Model Yr. Start:** 2013 * **Model Yr. End:** 2019
 * **Make:** Winnebago
 * **Model:** Horizon

Type:
Body Style:
Powertrain:

Production Dates Begin: 04/05/2012
 End: 07/24/2019

Descriptive Information:
 Affected VINs were found thru our production records and Engineering drawing records.

VIN Range(s): Begin: End:

Winnebago Forza 2014 - 2023

* **Model Yr. Start:** 2014 * **Model Yr. End:** 2023
 * **Make:** Winnebago
 * **Model:** Forza

Type:
Body Style:
Powertrain:

Production Dates Begin: 04/18/2013
 End: 11/04/2022

Descriptive Information:
 Affected VINs were found thru our production records and Engineering drawing records.

VIN Range(s): Begin: End:

Winnebago Intent 2018 - 2021

* **Model Yr. Start:** 2018 * **Model Yr. End:** 2021
 * **Make:** Winnebago
 * **Model:** Intent

Type:
Body Style:
Powertrain:

Production Dates Begin: 05/25/2017
 End: 08/20/2020

Descriptive Information:
 Affected VINs were found thru our production records and Engineering drawing records.

VIN Range(s): Begin: End:

Winnebago Brave 2015 - 2016		
* Model Yr. Start: 2015	* Model Yr. End: 2016	Type:
* Make: Winnebago		Body Style:
* Model: Brave		Powertrain:
Production Dates	Begin: 04/02/2014 End: 03/07/2016	Descriptive Information: Affected VINs were found thru our production records and Engineering drawing records.
VIN Range(s):	Begin: End:	

Itasca Tribute 2015 - 2016		
* Model Yr. Start: 2015	* Model Yr. End: 2016	Type:
* Make: Itasca		Body Style:
* Model: Tribute		Powertrain:
Production Dates	Begin: 06/05/2014 End: 03/07/2016	Descriptive Information: Affected VINs were found thru our production records and Engineering drawing records.
VIN Range(s):	Begin: End:	

Number potentially involved:	Estimated percentage of involved with defect: %
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Defect / Noncompliance Description	
For this Defect/Noncompliance:	
<p>* Describe the defect or noncompliance: The turn signals used in impacted models do not meet requirements for effective luminous lens area according to FMVSS 108 requirements.</p> <p>If a noncompliance, provide the applicable FMVSS:</p> <p>If applicable, provide any further FMVSS affected:</p> <p>Describe the cause: An error in a supplier test report led Winnebago to believe the turn signal was compliant.</p>	<p>* Describe the safety risk: Winnebago believes that this matter is inconsequential to motor vehicle safety and therefore will be filing a petition for inconsequential noncompliance in accordance with the provisions of CFR Part 556.</p> <p>Identify any warning which can precede or occur: Not applicable</p>
This Recall affects all vehicles.	
If applicable, identify the manufacturer of the defective or noncompliant component. If the manufacturer of the component is unknown, provide the information for the company that supplied the subject component.	
Component manufacturer	
Company Information	Company Contact Information
Company Name:	First Name:
Country:	Last Name:
Address 1:	Position:
Address 2:	Email:
City:	Phone:
State:	
Zip/Postal Code:	

Involved Components	
If the defect or noncompliance involves a specific component(s), identify that component(s) below.	
Component Name:	Turn Signal
Component Description:	Turn Signal
Component Part Number:	146560

Chronology of Defect / Noncompliance Determination
Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:

In late July of 2022, while in discussions with a lamp manufacturer on a new turn signal, the lamp manufacturer informed Winnebago there was a concern that the current lamp did not meet FMVSS 108 requirements for effective projected luminous lens area for Class A motorhomes. An investigation and subsequent assessment of the subject turn signal and relevant standards confirmed the concern. The Winnebago Product Safety Committee met to review the issue in early November and determined that the turn signals were noncompliant, however no safety risk was identified. Therefore, it was decided to file the required 573 and submit a petition for inconsequential noncompliance. There are no known incidents associated with this noncompliance.

Identify the Remedy

Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.

If a recall is required "Reimbursement request will fall under the general reimbursement plan on file with NHTSA"

Describe what distinguishes the remedy component from the recalled component.

The new turn signal will have a larger lens meeting the Effective Projected Luminous Area requirement of FMVSS 108.

Identify and describe how and when the recall condition was corrected in production.

An alternate turn signal will be implemented as soon as possible.

Identify the Recall Schedule

Describe the recall schedule for notifications.:

Winnebago believes that this matter is inconsequential to motor vehicle safety and therefore will be filing a petition for inconsequential noncompliance in accordance with the provisions of CFR Part 556.

Planned Dealer Notification Begin Date:

Planned Dealer Notification End Date:

Planned Owner Notification Begin Date:

Planned Owner Notification End Date:

Manufacturer's identification code for this recall (if applicable):

Please be reminded that owner notification letters must be mailed no more than 60 days from submission of this report.

Manufacturer Comments to NHTSA Staff

Document Upload

There are 0 documents associated with this report.

Dale Jordal
Product Safety Administrator
Winnebago Industries, Inc.
13200 Pioneer Trail
Eden Prairie, MN 55347
P: 641-585-6472
E: djordal@winnebagoind.com

May 17, 2023

VIA FEDERAL EXPRESS

Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Winnebago Industries, Inc. – Revised Petition for Inconsequential Noncompliance Resubmission

Dear Acting Administrator Carlson,

Winnebago Industries, Inc. (“Winnebago”) is submitting this revised Petition for Inconsequential Noncompliance (“Petition”) in accordance with 49 U.S.C. §§ 30118, 30120 and 49 C.F.R. Part 556. On November 11, 2022, Winnebago submitted a noncompliance report pursuant to 49 C.F.R. Part 573 (“Part 573 Report”) which explained that the turn signals in certain Winnebago vehicles do not meet the effective projected luminous lens area requirements set forth in S6.4.1 and Table IV-a of FMVSS No. 108. On December 2, 2022, Winnebago submitted an amended Part 573 Report and the initial Part 556 petition to NHTSA.

After NHTSA’s Office of Vehicle Safety Compliance reviewed our December 2, 2022 Part 556 petition, the agency found that the vehicle model and model year information provided in the petition did not align with the information provided in its Part 573 Report. Per the agency’s request, Winnebago hereby submits the revised petition that requests that the agency determine that the subject noncompliance found in vehicles with make, model, and model year provided in section II of this petition is inconsequential to motor vehicle safety.

For the agency’s convenience, Winnebago hereby provides a copy of the amended Part 573 Report filed with the agency on 5/17/2023 herewith as Attachment A.

I. FACTUAL AND REGULATORY BACKGROUND

Winnebago, a corporation organized under the laws of the State of Iowa, is a manufacturer of various types of motor vehicles, including motorhomes. Winnebago’s corporate address is 13200 Pioneer Trail, Eden Prairie, MN 55347.

The noncompliance in this matter relates to FMVSS No. 108, which sets forth the requirements for original and replacement lamps, reflective devices, and associated equipment, including effective projected luminous lens area requirements applicable to turn signals.¹ Specifically, Table IV-a in FMVSS No. 108 provides that the minimum effective projected luminous lens area for each turn signal lamp in multipurpose passenger vehicles with 2,032 millimeters or more in overall width is 7,500 square millimeters.²

NHTSA has explained that the purpose of FMVSS 108 requirements is to reduce traffic accidents by, *inter alia*, “enhancing the conspicuity of motor vehicles on the public roads so that their presence is perceived and their signals understood, both in daylight and in darkness or other conditions of reduced visibility.”³ Further, in a 1990 final rule notice increasing the minimum lens area for wide vehicles from 8 square inches (i.e., 5,161.28 sq mm) to 12 square inches (i.e., 7,741 sq mm), NHTSA explained that the increase in lens area is necessary because wide vehicles “are susceptible to build up of grime” and “an increase in lens area would enhance vehicle conspicuity and contribute to safety.”⁴

In or about late July 2022, Winnebago was informed by a lamp supplier that there was concern regarding the compliance of current turn signals installed in certain Winnebago vehicles with the minimum effective projected luminous area requirements of FMVSS No. 108. Upon investigation and subsequent assessment of the subject turn signals, Winnebago confirmed that the effective projected luminous lens area of turn signals in subject vehicles is 6,361 square millimeters -- *i.e.*, 1,139 square millimeters smaller than the required minimum lens area -- and submitted the Part 573 Report to NHTSA on November 11, 2022.

II. DESCRIPTION OF THE NONCOMPLIANCE

As noted previously, FMVSS No. 108 requires that the minimum effective projected luminous lens area for each turn signal lamp in multipurpose passenger vehicles with 2,032 mm or more in overall width should be 7,500 square millimeters.⁵

Upon investigation and review, Winnebago determined that the effective projected luminous lens area of turn signals installed on the following vehicles is 6,361 square millimeters – *i.e.*, 1,139 square millimeters smaller than the required minimum lens area. The turn signals at issue have been in use for more than 15 years and Winnebago is not aware of any crashes, injuries, customer complaints or field reports in connection with this noncompliance.

Make	Model	Model Year	Production Dates Begin	Production Dates End
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¹ See 49 C.F.R. § 571.108 S1; S6.4.1. “Effective projected luminous lens area” is defined as “the area of the orthogonal projection of the effective light-emitting surface of a lamp on a plane perpendicular to a defined direction relative to the axis of reference. Unless otherwise specified, the direction is coincident with the axis of reference.” *Id.* at S4.

² *Id.* at Table IV-a.

³ *Id.* at S2.

⁴ See *Federal Motor Vehicle Safety Standards; Lamps, Reflective Devices, and Associated Equipment*, 55 Fed. Reg. 20158 (May 15, 1990).

⁵ *Id.* at Table IV-a.

Winnebago	Vista	2015 – 2021	01/13/2014	04/26/2021
Winnebago	Sunstar	2015 – 2021	01/13/2014	04/26/2021
Winnebago	Horizon	2013 - 2019	04/05/2012	07/24/2019
Winnebago	Forza	2014 – 2023	04/18/2013	11/04/2022
Winnebago	Intent	2018 – 2021	05/25/2017	08/20/2020
Winnebago	Brave	2015 – 2016	04/02/2014	03/07/2016
Itasca	Tribute	2015 - 2016	06/05/2014	03/07/2016

Approximately 13,000 vehicles are affected by the noncompliance.

III. LEGAL STANDARDS APPLICABLE TO PETITIONS FOR INCONSEQUENTIAL NONCOMPLIANCE

NHTSA has determined that under the National Highway and Motor Vehicle Safety Act (“Safety Act”) and 49 C.F.R. Part 556, NHTSA may consider, in appropriate circumstances, whether an instance of noncompliance with an FMVSS is inconsequential to motor vehicle safety.⁶ Because neither the Safety Act nor 49 C.F.R. Part 556 define “inconsequential,” NHTSA has explained that “the agency determines whether a particular noncompliance is inconsequential to motor vehicle safety based upon the specific facts before it in a particular petition.”⁷ NHTSA has stated that a key question in evaluating a petition for inconsequential noncompliance is “whether the noncompliance in question is likely to increase the safety risk to individual occupants.”⁸

IV. BASIS FOR WINNEBAGO’S PETITION FOR INCONSEQUENTIAL NONCOMPLIANCE

The sole noncompliance at issue relates to turn signals that are slightly smaller than the required minimum effective projected luminous lens area set forth in FMVSS No. 108. The turn signals are otherwise fully compliant with all applicable performance requirements, including the visibility and photometry requirements under FMVSS No. 108. The turn signals at issue have been in use for more than 15 years, and Winnebago is not aware of any crashes, injuries, customer complaints or field reports in connection with this noncompliance. Thus, Winnebago believes that the turn signals that are slightly smaller than the required minimum lens area are likely to be imperceptible to both vehicle occupants and approaching drivers, and do not have an effect on the conspicuity of the vehicles on which they are installed.

Furthermore, in increasing the required minimum lens area for turn signals in wide vehicles, NHTSA was concerned about, *inter alia*, the buildup of grime and dirt on turn signals.⁹ The turn signals at issue, however, are installed on motorhomes, which are generally well maintained by their owners compared to other classes of wide vehicles. Thus, turn signals that have a slightly smaller lens area than the requirement under FMVSS No. 108 would not reasonably result in a buildup of dirt and grime on

⁶ See *BMW of North America, LLC; Jaguar Land Rover North America, LLC; and Autoliv, Inc.; Decisions of Petitions for Inconsequential Noncompliance*, 84 Fed. Reg. 19,994, 19,996 (May 7, 2019).

⁷ *Id.* at 19,997.

⁸ *Id.*

⁹ See *Federal Motor Vehicle Safety Standards; Lamps, Reflective Devices, and Associated Equipment*, 55 Fed. Reg. 20158 (May 15, 1990).

turn signals, further alleviating any concern NHTSA had when it first required an increased lens area for turn signals installed on wide vehicles.

In sum, because the slightly smaller turn signals do not affect the conspicuity of the turn signals, would likely not result in the buildup of dirt and grime, and are otherwise fully compliant with all other performance requirements, Winnebago reasonably believes that the noncompliance at issue is inconsequential to motor vehicle safety.

V. CONCLUSION

For the reasons set forth above, pursuant to 49 C.F.R. 556, Winnebago respectfully requests relief from the owner and dealer notification requirements set forth in 49 C.F.R. 577. If you have any questions regarding this Petition, please do not hesitate to contact me at any time, either by e-mail at djordal@winnebagoind.com, or by phone at 641-585-6472.

Sincerely,

Dale Jordal
Product Safety Administrator
Winnebago Industries, Inc.

ATTACHMENT A
(Part 573 Noncompliance Report)

Part 573 Safety Recall Report

22V-839

Manufacturer Name : Winnebago Industries, Inc.

Submission Date : NOV 11, 2022

NHTSA Recall No. : 22V-839

Manufacturer Recall No. : NR



Manufacturer Information :

Population :

Manufacturer Name : Winnebago Industries, Inc.

Number of potentially involved : NR

Address : PO BOX 152
605 W. Crystal Lake Rd. Forest City IA
50436

Estimated percentage with defect : NR

Company phone : 1-641-585-3535

Vehicle Information :

Vehicle 1 : 2015-2021 Winnebago Vista, Sunstar

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : JAN 13, 2014 - APR 26, 2021

VIN Range 1 : Begin : NR **End :** NR Not sequential

Vehicle 2 : 2013-2019 Winnebago Horizon

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : APR 05, 2012 - JUL 24, 2019

VIN Range 1 : Begin : NR **End :** NR Not sequential

Vehicle 3 : 2014-2023 Winnebago Forza

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : APR 18, 2013 - NOV 04, 2022

VIN Range 1 : Begin : NR **End :** NR Not sequential

Vehicle 4 : 2018-2021 Winnebago Intent

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : MAY 25, 2017 - AUG 20, 2020

VIN Range 1 : Begin :

NR

End : NR

Not sequential

Description of Noncompliance :

Description of the Noncompliance : The turn signals used in impacted models do not meet requirements for effective luminous lens area according to FMVSS 108 requirements.

FMVSS 1 : NR

FMVSS 2 : NR

Description of the Safety Risk : Winnebago believes that this matter is inconsequential to motor vehicle safety and therefore will be filing a petition for inconsequential noncompliance in accordance with the provisions of CFR Part 556.

Description of the Cause : An error in a supplier test report led Winnebago to believe the turn signal was compliant.

Identification of Any Warning that can Occur : Not applicable

Involved Components :

Component Name 1 : Turn Signal

Component Description : Turn Signal

Component Part Number : 146560

Supplier Identification :

Component Manufacturer

Name : NR

Address : NR

NR

Country : NR

Chronology :

In late July of 2022, while in discussions with a lamp manufacturer on a new turn signal, the lamp manufacturer informed Winnebago there was a concern that the current lamp did not meet FMVSS 108 requirements for effective projected luminous lens area for Class A motorhomes. An investigation and subsequent assessment of the subject turn signal and relevant standards confirmed the concern.

The Winnebago Product Safety Committee met to review the issue in early November and determined that the turn signals were noncompliant, however no safety risk was identified. Therefore, it was decided to file the required 573 and submit a petition for inconsequential noncompliance.

There are no known incidents associated with this noncompliance.

Description of Remedy :

Description of Remedy Program : If a recall is required "Reimbursement request will fall under the general reimbursement plan on file with NHTSA"

How Remedy Component Differs from Recalled Component : The new turn signal will have a larger lens meeting the Effective Projected Luminous Area requirement of FMVSS 108.

Identify How/When Recall Condition was Corrected in Production : An alternate turn signal will be implemented as soon as possible.

Recall Schedule :

Description of Recall Schedule : Winnebago believes that this matter is inconsequential to motor vehicle safety and therefore will be filing a petition for inconsequential noncompliance in accordance with the provisions of CFR Part 556.

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported

Part 573 Safety Recall Report

22V-839

Manufacturer Name : Winnebago Industries, Inc.**Submission Date :** DEC 02, 2022**NHTSA Recall No. :** 22V-839**Manufacturer Recall No. :** NR**Manufacturer Information :****Population :**

Manufacturer Name : Winnebago Industries, Inc.

Number of potentially involved : NR

Address : PO BOX 152
605 W. Crystal Lake Rd. Forest City IA
50436

Estimated percentage with defect : NR

Company phone : 1-641-585-3535

Vehicle Information :

Vehicle 1 : 2015-2021 Winnebago Vista, Sunstar

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : JAN 13, 2014 - APR 26, 2021

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 2 : 2013-2019 Winnebago Horizon

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : APR 05, 2012 - JUL 24, 2019

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 3 : 2014-2023 Winnebago Forza

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : APR 18, 2013 - NOV 04, 2022

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 4 : 2018-2021 Winnebago Intent

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : MAY 25, 2017 - AUG 20, 2020

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 5 : 2015-2016 Winnebago Brave

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : APR 02, 2014 - MAR 07, 2016

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 6 : 2015-2016 Itasca Tribute

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : JUN 05, 2014 - MAR 07, 2016

VIN Range 1 : Begin : NR End : NR Not sequential

Description of Noncompliance :

Description of the Noncompliance : The turn signals used in impacted models do not meet requirements for effective luminous lens area according to FMVSS 108 requirements.

FMVSS 1 : NR

FMVSS 2 : NR

Description of the Safety Risk : Winnebago believes that this matter is inconsequential to motor vehicle safety and therefore will be filing a petition for inconsequential noncompliance in accordance with the provisions of CFR Part 556.

Description of the Cause : An error in a supplier test report led Winnebago to believe the turn signal was compliant.

Identification of Any Warning that can Occur : Not applicable

Involved Components :

Component Name 1 : Turn Signal

Component Description : Turn Signal

Component Part Number : 146560

Supplier Identification :**Component Manufacturer**

Name : NR

Address : NR

NR

Country : NR

Chronology :

In late July of 2022, while in discussions with a lamp manufacturer on a new turn signal, the lamp manufacturer informed Winnebago there was a concern that the current lamp did not meet FMVSS 108 requirements for effective projected luminous lens area for Class A motorhomes. An investigation and subsequent assessment of the subject turn signal and relevant standards confirmed the concern.

The Winnebago Product Safety Committee met to review the issue in early November and determined that the turn signals were noncompliant, however no safety risk was identified. Therefore, it was decided to file the required 573 and submit a petition for inconsequential noncompliance.

There are no known incidents associated with this noncompliance.

Description of Remedy :

Description of Remedy Program : If a recall is required "Reimbursement request will fall under the general reimbursement plan on file with NHTSA"

How Remedy Component Differs from Recalled Component : The new turn signal will have a larger lens meeting the Effective Projected Luminous Area requirement of FMVSS 108.

Identify How/When Recall Condition was Corrected in Production : An alternate turn signal will be implemented as soon as possible.

Recall Schedule :

Description of Recall Schedule : Winnebago believes that this matter is inconsequential to motor vehicle safety and therefore will be filing a petition for inconsequential noncompliance in accordance with the provisions of CFR Part 556.

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported

Part 573 Safety Recall Report

22V-839

Manufacturer Name : Winnebago Industries, Inc.

Submission Date : MAY 17, 2023

NHTSA Recall No. : 22V-839

Manufacturer Recall No. : NR



Manufacturer Information :

Population :

Manufacturer Name : Winnebago Industries, Inc.

Number of potentially involved : 13,126

Address : PO BOX 152
605 W. Crystal Lake Rd. Forest City IA
50436

Estimated percentage with defect : 100 %

Company phone : 1-641-585-3535

Vehicle Information :

Vehicle 1 : 2015-2021 Winnebago Vista, Sunstar

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : JAN 13, 2014 - APR 26, 2021

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 2 : 2013-2019 Winnebago Horizon

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : APR 05, 2012 - JUL 24, 2019

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 3 : 2014-2023 Winnebago Forza

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : APR 18, 2013 - NOV 04, 2022

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 4 : 2018-2021 Winnebago Intent

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : MAY 25, 2017 - AUG 20, 2020

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 5 : 2015-2016 Winnebago Brave

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : APR 02, 2014 - MAR 07, 2016

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 6 : 2015-2016 Itasca Tribute

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Affected VINs were found thru our production records and Engineering drawing records.

Production Dates : JUN 05, 2014 - MAR 07, 2016

VIN Range 1 : Begin : NR End : NR Not sequential

Description of Noncompliance :

Description of the Noncompliance : The turn signals used in impacted models do not meet requirements for effective luminous lens area according to FMVSS 108 requirements.

FMVSS 1 : NR

FMVSS 2 : NR

Description of the Safety Risk : Winnebago believes that this matter is inconsequential to motor vehicle safety and therefore will be filing a petition for inconsequential noncompliance in accordance with the provisions of CFR Part 556.

Description of the Cause : An error in a supplier test report led Winnebago to believe the turn signal was compliant.

Identification of Any Warning that can Occur : Not applicable

Involved Components :

Component Name 1 : Turn Signal

Component Description : Turn Signal

Component Part Number : 146560

Supplier Identification :**Component Manufacturer**

Name : NR

Address : NR

NR

Country : NR

Chronology :

In late July of 2022, while in discussions with a lamp manufacturer on a new turn signal, the lamp manufacturer informed Winnebago there was a concern that the current lamp did not meet FMVSS 108 requirements for effective projected luminous lens area for Class A motorhomes. An investigation and subsequent assessment of the subject turn signal and relevant standards confirmed the concern.

The Winnebago Product Safety Committee met to review the issue in early November and determined that the turn signals were noncompliant, however no safety risk was identified. Therefore, it was decided to file the required 573 and submit a petition for inconsequential noncompliance.

There are no known incidents associated with this noncompliance.

Description of Remedy :

Description of Remedy Program : If a recall is required "Reimbursement request will fall under the general reimbursement plan on file with NHTSA"

How Remedy Component Differs from Recalled Component : The new turn signal will have a larger lens meeting the Effective Projected Luminous Area requirement of FMVSS 108.

Identify How/When Recall Condition was Corrected in Production : An alternate turn signal will be implemented as soon as possible.

Recall Schedule :

Description of Recall Schedule : Winnebago believes that this matter is inconsequential to motor vehicle safety and therefore will be filing a petition for inconsequential noncompliance in accordance with the provisions of CFR Part 556.

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported