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National Highway Traffic Safety Administration

1200 New Jersey Ave. SE West Building

Washington, DC 20590

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Safety commission: Concern and complaint Power King Towmax STR tires

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On September 13, 2015 I experienced a tire failure on my 2013 Keystone Cougar Half Ton 21RB SWI. I was returning home from dry camping at Donner Lake, California, traveling west bound on Highway 80 just east of Sacramento traveling between 55 and 60 mph. I had traveled approximately 40 miles early in the day with a temperature of around 70 degrees F. I saw through the passenger side mirror that one of the right side trailer tires was shredding. I had to continue approximately 100 yards in order to find a safe place to pull over as there were concrete barriers on both sides of the road. When stopped I found that the tire was still losing air and that the tread had completely separated from the casing. The side wall was still intact. I was forced to wait almost an hour for someone to come and change the tire in an unsafe area as the paved shoulder was only slightly wider than the trailer. I then drove an additional 50 miles to reach my residence.

The following day I checked the tire pressures in the remaining tires: LR 61 PSI; LF 60 PSI; RR 58 PSI. There was extensive damaged to the sheet meal surrounding the dual axels. The tread depth was near new having been towed a little over 8,000 miles since the purchase of the triler. The damaged tire resembled what happens to recapped tires on commercial trucks.

I began researching this issue and found that your agency had 67 previous complaints regarding the same problem as of 09/18/2015. In reviewing Towmax tire guide, I found recommendations that I was never made aware existed when I purchased the trailer. The trailer was stored longer than three months sitting on compacted road base rock and the tires were covered during this storage period. I did not check tire pressure the morning of the failure prior to starting the trip. In the 8,000 miles of travel the speed may have been up to 65 mph for short periods but averaged 55 mph. All these actions are in violation of the Towmax maintence procedures as listed as a part of their warranty.

Having reviewed some of the 67 complaints it appeared that the chance that I would have additional tire failures was quit high so I immediately replaced all four tires with Maxxis ST 225/75R-T5/10 tires. What I have found interesting is in this time of recalls on motor vehicles being such a big part of current news reports, nothing appears to be happening with tire manufacturers, specifically the steel belts with nylon cap. I have been told that even thou the tread and side walls are visually sound that they would recommend that the trailer tires be replaced at a minimum of every three years. Again with the push to be environmentally sound how we can continue to produce a product which has such a short life span and has such a limited capability of being recycled.

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I am sure Keystone is not the only trailer manufacturer trying to make a profit but I would like to point out some things I found interesting regarding the specifications on the trailer I purchased: tires were potentially a year old when purchased with a date code of DOT 83B4 GP8 2012 DY.

Tow Max 51, ST 225/75R 15 D/8 2540 LBS @ 65 PSI.

Dry Wt: 5310 LBS; Payload 1890 LBS; GVWR 7200 LBS

Potential Payload:

Hot water tank	6 gals	6 x 8.355 LBS = 50.13
Fresh water tank	60 gals	60 x 8.355 LBS = 501.30
Grey water tank	70 gals	70 x 8.355 LBS = 634.99
Black water tank	38 gals	38 x 8.355 LBS = 317.49
Two propane tanks	14 gals	14 x 4.111 LBS = 57.56 rounded to 60lbs to include tanks
Two 12 volt deep cell batteries		2 x 60 LBS = 120
This is the potential payload per design		1,683.91 LBS

The manufactures payload is 1,890 LBS which means with essentials of daily living such as pots, pans, dishes, food, clothing, etc. would likely exceed the remaining 206.09 allowed to reach the payload limit.

I realize that manufacturer recommends that all tanks be emptied prior to travel. In my case the propane tanks were close to full, I have 2 batteries, and the total of all three water tanks was less than 10 gals. I have never traveled with more than a total of 40 gals in the water tanks.

My replacement tires are a ten ply rated tire which is steel covered by nylon. I have doubts about them but they afford the potential tire load rate to go from 2540 LBS to 2830 LBS. This is something I would think the manufacturer should have taken into consideration during the design of the trailer.

I would hope that there is data somewhere that justifies allowing the manufacturing and distribution of a tire which by design could cause injury or death. This may sound melodramatic but being on a busy interstate just off the fog line with 18 wheelers passing at upwards of 65 mph for over an hour is in mind not a safe condition.

My trailer sustained extensive damage to the sheet metal above the dual axles along with trim and decals. The bracing was bent and the fiber barrier which is a part of the wheel well is torn. At this time I have only one estimate for the cost of repair which exceeded five thousand dollars. The insurance adjuster has not authorized this estimate and his authorized repair estimate is for considerately less.

I am forwarding a copy of this letter to the National Traffic Safety Administration, Keystone Manufacturing and Folsom Trailer Sales. It would be my hope that someone will take the time to see if my comments contain some valid points that should be addressed for the protection of the consumer and the environment.

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Placerville, Ca [redacted]

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