



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

SEP 7 2005

400 Seventh Street, S.W.
Washington, D.C. 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Rick Lepa
Chief Operating Officer
Exiss Trailer Company
900 East Trail Blvd.
El Reno, OK 73036

NVS-214tb
PE05-048

Dear Mr. Lepa:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE05-048) to investigate a reported wheel separation that allegedly occurred in a livestock or horse trailer manufactured by Exiss Trailer ("Exiss").

On August 26, 2005, ODI was notified of a wheel separation event alleged to have occurred on an interstate highway in Georgia on August 11, 2005. Following discussions with the Georgia State Patrol and Exiss personnel, ODI obtained and sent a copy of the relevant Georgia State Patrol Accident Report (No. 43-712-05) to Exiss on August 30, 2005.

Based on the interviews conducted to date, ODI believes that a recently purchased Exiss Model "Sooner" horse trailer was being towed northbound on I-75 when the left rear wheel and tire separated from the trailer, crossed the median, and struck a southbound vehicle resulting in a personal injury crash.

Complaints to ODI -

ODI has researched ODI's database of consumer complaints and determined that prior to the incident reported on August 26, 2005, ODI was not aware of any reports of wheel loosening or separating from an Exiss vehicle.



DOT AUTO SAFETY HOTLINE
888-DASH-2-DOT
888-327-4236

Potentially Related Investigations -

ODI has conducted investigations at Fleetwood (EA04-009) and Jayco (EA04-019) and is currently conducting investigations at Keystone (EA04-032), Pace American (EA04-033), and Haulmark (EA05-001), all which pertain to wheel separations in recreational or cargo fifth wheel or trailer vehicles.

In order for my staff to evaluate this issue, ODI is requesting that Exiss:

- (1) Notify ODI of all newly reported events of wheel separations as outlined below in the section titled, "Newly Reported Incidents" and
- (2) Provide certain information as outlined in the section titled "Information Requested."

Newly Reported Incidents-

The purpose of this section of this Information Request is to request Exiss Trailers, Inc. to provide ongoing reports to ODI of all newly reported wheel separation incidents that have been reported in Exiss vehicles.

ODI requests prompt notification of any newly reported wheel separation incidents reported to Exiss Trailer since there is a possibility that ODI would send a team to inspect the affected vehicle and/or relevant wheel end components and would like to conduct this inspection as soon as possible before repairs are performed so that the risk that components are discarded, lost, re-used, etc. is minimized. Accordingly, Exiss Trailer must notify ODI within 48 hours when Exiss learns of a wheel separation due to any cause, whether or not confirmed, regardless of vehicle age, and whether or not loosening or breakage of the wheel mounting nuts and/or wheel mounting studs is the suspected cause.

This request is ongoing and terminates on June 30, 2006, but may be extended if circumstances warrant.

Each notification should be e-mailed to tom.bowman@nhtsa.dot.gov (phone 202-366-2583). The notification should provide as much of the following incident information as possible. Timeliness is critical. Any of the requested information that is not immediately available at the time of initial incident notification must be provided as soon thereafter as it becomes available.

Each notification should, at a minimum, include the following information:

1. Vehicle Identification Number (VIN) of the trailer;
2. Model and Model Year of the trailer;
3. Build date of trailer;
4. Owner's name, address, and phone number;
5. Date of incident;
6. Location of incident;
7. Whether any property damage, personal injuries, and/or fatalities are alleged to have resulted from the incident;
8. Current location of trailer, wheel mounting nuts and studs, and separated wheel;
9. Name of Exiss Trailer's supplier of the axle assembly and Exiss Trailer's part number of the axle assembly installed in the incident vehicle;
10. Name of Exiss Trailer's supplier of the wheels and Exiss Trailer's part number of the wheels installed in the incident vehicle;
11. Description of the incident.

Information Requested –

ODI is requesting certain additional information from Exiss Trailer.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicle(s)**: all "Trailer" and "Fifth Wheel" vehicles manufactured by Exiss Trailer since January 1, 2000, and sold or leased in the United States.
- **Subject components**: the wheels, brake drums or brake rotors, hubs, wheel mounting studs, and/or wheel mounting nuts installed in the subject vehicles.
- **Exiss Trailer ("Exiss")**: all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee to a consultant) by or under the control of Exiss Trailer (including all business units and persons previously referred to), who are or, in or after 2000 were involved in any way with any of the following related to the alleged defect in the subject vehicles:

- a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
 - d. Communication to, from, or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect:** loosening or separation of the wheels
 - **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Exiss Trailer, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion,

insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response.

After Exiss' response to each request, identify the source of the information and indicate the last date the information was gathered.

To the extent possible, provide the requested information in Microsoft 2000 Access or Excel electronic format.

VEHICLE PRODUCTION DATA BY WHEEL CONFIGURATION

1. Provide a table that identifies the number of Exiss vehicles manufactured since January 2000, by model year, by plant, and by vehicle model.

Provide the table in Microsoft Access 2000, Excel 2000, or a compatible format, entitled "REQUEST NUMBER ONE - VEHICLE PRODUCTION

DATA.”

2. Provide a table that identifies the number of Exiss vehicles manufactured since January 2000, by model year, by plant, and by vehicle model equipped with:
 - (a) aluminum wheels with five hole mounting;
 - (b) aluminum wheels with six hole mounting;
 - (c) aluminum wheels with eight hole mounting;
 - (d) steel wheels with five hole mounting;
 - (e) steel wheels with six hole mounting;
 - (f) steel wheels with eight hole mounting;
 - (g) any “other” wheel material and/or mounting configurations that Exiss has used to install wheels on recreational vehicles manufactured since January 2000. (Provide a brief description of each additional wheel mounting configuration and wheel material listed.)

Provide the table in Microsoft Access 2000, Excel 2000, or a compatible format, entitled “REQUEST NUMBER TWO – VEHICLE PRODUCTION DATA BY WHEEL CONFIGURATION.”

REPORTS OF WHEEL LOOSENING OR WHEEL SEPARATIONS

3. Provide a table that identifies by model year, by plant, and by vehicle model, the number of Exiss vehicles manufactured since January 2000 which were reported to have experienced a wheel loosening or a wheel separation (whether verified or not and regardless of the cause or suspected cause).

This summary should include reports from all sources including reports made by “transporters” (drivers who transport vehicles from the manufacturing site to the selling dealership), dealership reports, warranty claims, customer complaints, etc.

Provide the table in Microsoft Access 2000, Excel 2000, or a compatible format, entitled “REQUEST NUMBER THREE – WHEEL LOOSENING OR SEPARATION SUMMARY.”

SPECIFICATIONS FOR WHEEL SEPARATION INCIDENT VEHICLES

4. For each wheel separation incident identified in response to Request No 3., identify:

- (a) the VIN;
- (b) the Gross Vehicle Weight Rating (GVWR);
- (c) the number of trailer axles installed in the vehicle;
- (d) the Gross Axle Rating (GAWR);
- (e) the vehicle build date;
- (f) the manufacturing or assembly site at which the wheels were installed to the vehicle
- (g) Exiss' part number for the axle assembly installed;
- (h) the name, address, and contact name of the supplier of the axle assembly installed;
- (i) the supplier's part number of the axle assembly installed;
- (j) Exiss' part number for the wheels installed;
- (k) the name, address, and contact name of the supplier of the wheels installed;
- (l) the supplier's part number of the wheels installed;
- (m) the number of mounting holes in the wheels;
- (n) the mounting circle of the wheel mounting studs;
- (o) the nominal diameter of the wheel mounting stud;
- (p) a brief description of the material composition of the wheels installed; (steel, aluminum, etc.);
- (q) whether the wheel is hub piloted or stud piloted;
- (r) whether the wheel was reported "loose" or "separated";
- (s) whether the incident resulted in property damage;
- (t) whether the incident resulted in personal injury;
- (u) whether the incident resulted in a fatality or fatalities.

Include the information from the vehicle involved in the August 11, 2005, incident in the above requested summary.

Provide the table in Microsoft Access 2000, Excel 2000 or a compatible format, entitled "REQUEST NUMBER FOUR -COMPONENT SPECIFICATIONS FOR WHEEL SEPARATION AND WHEEL END LOOSENING INCIDENT VEHICLES."

5. For each vehicle listed in response to Requests No. 3 and No. 4 above, "Reports of Wheel Loosening or Wheel Separations," identify and describe any components or materials that Exiss may have inserted or installed in the wheel end assembly other

than the hub, wheel, wheel mounting studs and wheel mounting nuts such as, but not limited to wheel spacers, anti-rust agents, lubricants, or the like and describe the vehicle configurations, facilities, and/or time periods in which these supplemental components or materials had been installed or applied.

ASSEMBLY AND QUALITY CONTROL PROCESSES FOR WHEEL END ASSEMBLIES

6. Describe and provide a copy of the wheel mounting and wheel nut torque procedures that are currently in effect at Exiss.

If the wheel mounting and wheel nut torque procedures vary by assembly plant or component configurations, provide all relevant procedures and describe the assembly plant or component configurations to which they apply.

7. Describe all changes in the wheel mounting and wheel nut torque procedures implemented since January 2000 until the present, the date that the change was implemented, and the reason for the change.
8. Describe and provide a copy of the manufacturing quality control plans, including frequency and method, that are currently in effect that Exiss has used to assure the correct mounting of the wheel to the hub and to validate that the wheel mounting nuts have been correctly installed and torqued.

If the manufacturing quality control plans vary by assembly plant or by component configurations, provide all relevant procedures and describe the assembly plant or component configurations to which they apply.

9. Describe all changes in the manufacturing quality control plans, including frequency and method, since January 2000 until the present that Exiss has used to assure the correct mounting of the wheel to the hub and to validate that the wheel mounting nuts have been correctly installed and torqued.
10. Provide a data based summary (copies of actual plant records are not required) that indicates the conformance to specification (or percent non-conforming) of the torque values recorded during production quality audits conducted for each manufacturing plant since January 2004.

VEHICLE DESIGN - WHEEL RETENTION CLAMP JOINT

11. Identify each logical grouping or "vehicle family" consisting of identical or equivalent wheel end components (i.e., equipped with identical or substantially similar wheels, hubs, wheel mounting studs and wheel mounting nuts) and provide the approximate clamp strength of the wheel end joint and identify the method by which Exiss established the clamp strength (calculation, published information, vendor, measurement, etc.).
12. Identify each logical grouping or "vehicle family" consisting of identical or equivalent wheel end components (wheel, hub, brake drum or rotor, wheel mounting stud and wheel mounting nut) and provide the estimated clamp requirements of the wheel end joint, a brief description of vehicle maneuver(s) that was considered in arriving at the stated clamp requirements (e.g. static, cornering, braking, etc.) and the method by which Exiss Trailer established the clamp requirements (calculation, published information, vendor, measurement, etc.).

CHANGES IN THE WHEEL END SYSTEM

13. Describe all modifications or changes made by, or on behalf of, Exiss in the design, material composition, manufacture, quality control, supply, or installation of the subject components (wheel, axle hub, wheel mounting studs, wheel mounting nuts), from the January 2000 to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
 - a) The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b) A detailed description of the modification or change;
 - c) The reason(s) for the modification or change;
 - d) The part numbers (service and engineering) of the original component;
 - e) The part number (service and engineering) of the modified component;
 - f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g) When the modified component was made available as a service component; and,
 - h) Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Exiss is aware of which may be incorporated into vehicle production within the next 120 days.

Note: All changes intended to improve the integrity and durability of the wheel mounting system that were implemented in response to wheel separation and wheel loosening should be clearly identified as such.

14. Describe all requested deviations from conformance to specifications received from all sources, the affected vehicle production, and provide a summary of the disposition for each of the requested deviations for the wheels, hubs, brake drum or rotor, wheel mounting studs, and wheel mounting nuts installed in the vehicles manufactured since January 2004.

FIELD RETURN INFORMATION

15. Provide a list that identifies (1) the VIN for each of the reported wheel separation incident that has occurred in vehicles identified in response to Request Nos. 3 and 4, "Reports of Wheel Loosening or Wheel Separations"; (2) whether the incident occurred in transit between Exiss Trailer and the selling dealer or after having been placed in service by the vehicle purchaser; (3) all of the wheel components (including but not limited wheels, wheel mounting nuts, wheel mounting studs, hub, and brake drum or brake rotor) that have been returned to Exiss Trailer or to Exiss Trailer's suppliers, contractors, consultants, etc.; (4) the current location of the retained returned components (5) the name and phone numbers of the custodian of the retained components.

If no components were returned from a listed incident, so state. If components were returned and later scrapped, so state and provide the approximate date and location that the returned components were scrapped.

16. Provide a copy of all inspection reports conducted by Exiss Trailer, Exiss Trailers' suppliers, and/or sub-contractors on returned wheel end components including but not limited to wheels, hubs, brake drums or rotors, wheel mounting studs and wheel mounting nuts listed in response to Request No 15.

17. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Exiss Trailer. For each such action, provide the following information:

- (a) Action title or identifier;
- (b) The actual or planned start date;
- (c) The actual or expected end date;
- (d) Brief summary of the subject and objective of the action;
- (e) Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- (f) A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

MANUFACTURER'S ASSESSMENT

18. Furnish Exiss' detailed opinion of the alleged defect in the subject vehicles. Include an assessment of the following:

- (a) the causal or contributing factors;
- (b) the failure mode;
- (c) the risk to motor vehicle safety that it poses;
- (d) what warnings, if any, are provided to the operator and other persons.

NOTICES

19. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Exiss Trailer has received from suppliers and/or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, and/or other documents or communications, with the exception of standard shop manuals.

20. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Exiss Trailer has issued to any owners, dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, and/or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Exiss Trailer is planning to issue within the next 120 days.

This letter is being sent to Exiss Trailer pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Exiss Trailer's failure to respond promptly and fully to this letter could subject Exiss Trailer to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond to ODI information requests.

If Exiss Trailer cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Exiss Trailer does not submit one or more requested documents or items of information in response to this information request, Exiss Trailer must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

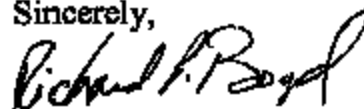
Exiss Trailer's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by October 13, 2005. Please refer to PE05-048 in Exiss Trailer's response to this letter. If Exiss Trailer finds that it is unable to provide all of the information requested within the time allotted, Exiss Trailer must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Exiss Trailer is unable to provide all of the information requested by the original deadline, it must submit a partial response by

the original deadline with whatever information Exiss Trailer then has available, even if an extension has been granted.

If Exiss Trailer claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Exiss Trailer must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Exiss Trailer is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Mr. Tom Bowman of my staff at (202) 366-2583.

Sincerely,



Richard P. Boyd, Chief
Medium & Heavy Duty Vehicle Division
Office of Defects Investigation