

April 22, 2008

Admitted in Indiana
and Michigan

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Ric Willard
U.S. Department of Transportation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington D.C. 20590

E-Mail Address: richard.willard@dot.gov

Re: Pace American, Inc.
NHTSA Recall No. 07V-526

Dear Mr. Willard:

On November 8, 2007, Pace American, Inc. filed a Part 573 Defect and Noncompliance Report. This was filed on the basis that we had one cargo trailer which had two wheels with hairline cracks around the outer part of the wheel, perpendicular to the rim. This caused the tire to deflate. In the process of filing a warranty claim with our supplier, Tredit Tire & Wheel Company, Inc., 57941 Charlotte Avenue in Elkhart, Indiana 46517, we were told by a low level employee that they had similar problems with these wheels from other customers. Since we were then on notice that there had been a number of wheel failures, we filed our notice with NHTSA.

In the course of investigating these wheels, we have learned that there were failures in aluminum and steel wheels used by two fifth wheel trailer manufacturers, Doubletree and Western RV. The investigation revealed that the failures were only for those wheels which supported the kitchen area on each of these travel trailers. This involved both aluminum and steel wheels. The manufacturers concluded that the weight of the kitchen cabinets, appliances and goods stored in the kitchen area caused the wheel failures due to the overweight condition on this side. Weighing empty trailers they discovered that the kitchen area wheels bore 3,300 pounds of weight while the other wheels only were bearing 2,900 pounds.

Pace American used these aluminum wheels which were manufactured by Ruedas EB SRL of Alvarado, 421-(2126) Fighere in Santa Fe, Argentina. Ruedas manufactured these wheels and sold them to U.S. Wheel which in turn sold them to Tredit Tire, Pace American's supplier. These wheels are a model called "Vented Mod". The backside of the wheel has a marking "DOT-T" with a maximum load of 3,750 lbs.. The wheels which fail on the Pace American trailer were in Batch 14 which were manufactured on March 4, 2005. Pace American used 1,257 of these wheels on various trailers from July 25, 2003 through January

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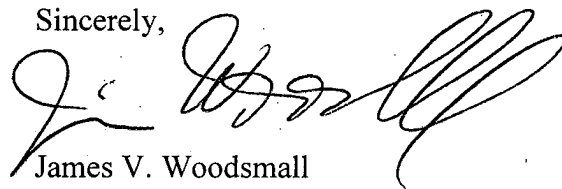
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5, 2006. These cracks have resulted in the loss of air in the tire. Pace American has had no other failures except for the two on this trailer. The trailer in question is used to haul automobiles and related equipment. Since the hairline cracks were parallel with the rim, this indicates that they were overloaded. Aluminum wheels do not flex in the same manner that metal wheels do. They crack instead.

Since the only wheels to crack were due to overload conditions, Pace American, Inc. respectfully requests to withdraw its Part 573 Defect and Noncompliance Report. Thank you for your assistance.

Sincerely,



James V. Woodsmall

JVW/mj

cc: Brian Skinner

SENT BY E-MAIL