



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**APR 23 2009**

Mr. Daniel Huang  
Armor Rex, Inc.  
1361 Mountain Circle  
Azusa, CA 91702

NVS-215aa  
EQ09-002  
09V-079

**Attn: Compliance Dept.**

Dear Mr. Daniel Huang,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you imported and to remind you of your responsibilities under Federal law.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 09V-079. In a letter dated March 4, 2009 Long Chih Industrial Co LTD (Long Chih) reported that certain trailers, produced between September 1, 2005 and December 31, 2008, do not display a tire placard as required by Federal Motor Vehicle Safety Standard No. 110, "Tire Selection and Rims". These trailers also lack proper GVWR/GAWR weight ratings on the certification label, do not indicate the weight measurements in pounds, and do not contain safety defect reporting information in their owner's manuals. Missing and incorrect information of this nature can lead to improper vehicle loading or tire inflation which could increase the risk of a crash. NHTSA assigned recall number 09V-079 to this matter.

In correspondence with Long Chih, Armor Rex, Inc. (your company) was identified as importing 3,812 of these recalled trailers into the United States. Please remember, per 49 U.S.C. 30102, Definitions, trailers are defined by the U.S. Safety Act as motor vehicles.

Pursuant to Federal law, "A manufacturer of a motor vehicle...shall notify the Secretary [of Transportation delegated to the National Highway Traffic Safety Administration (NHTSA)] and the owners, purchasers, and dealers...if the manufacturer...decides in good faith that the vehicle or equipment does not comply with an applicable motor vehicle safety standard..." [49 U.S.C. § 30118(c)]. Federal law also defines the manufacturer to be "a person...importing motor vehicles or ...equipment for resale." [49 U.S.C. § 30102(a)(5)] The information required in the notification to NHTSA is specified in 49 CFR § 573, Defect and Noncompliance Responsibility and Reports. Sample forms may be found at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. As of the date of this letter, we have not received a report from your company.



This letter serves to remind you of your company's responsibilities if it is an importer of motor vehicles and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliance; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and Long Chih; and an identification of your company's role in the distribution chain for potentially affected trailers. Specifically, please include the date on which you received notification of this matter from Long Chih.

In view of the risk of personal injury, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased these recalled trailers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect and Noncompliance Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and
- e. the approximate date on which the dealer notification will be completed.

**Please note:** As Long Chih has volunteered to conduct the recall remedy, notify owners, and submit quarterly reports, RMD is not requiring this action from your company at this time. However, you must provide a Defect and Noncompliance Information Report. Should Long Chih not be able to properly conduct this safety recall and submit timely reports, these responsibilities will be required of your company.

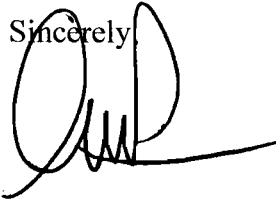
If your company does not agree with the decision made by Long Chih that these trailers fail to comply with FMVSS, please provide an explanation for your company's position. If your company has not received any of these trailers, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company sold any of these trailers to be resold, please identify the purchaser by name and address.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this

letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ09-002**. A Defect Noncompliance Report guide is available on-line to assist you at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,  


George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

**APR 23 2009**

Mr. Dustin Brooks  
Central Purchasing, LLC  
1500 E. 3rd St  
Oxnard, CA 93030

NVS-215aa  
EQ09-002  
09V-079

**Attn: Compliance Dept.**

Dear Mr. Dustin Brooks,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you imported and to remind you of your responsibilities under Federal law.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 09V-079. In a letter dated March 4, 2009 Long Chih Industrial Co LTD (Long Chih) reported that certain trailers, produced between September 1, 2005 and December 31, 2008, do not display a tire placard as required by Federal Motor Vehicle Safety Standard No. 110, "Tire Selection and Rims". These trailers also lack proper GVWR/GAWR weight ratings on the certification label, do not indicate the weight measurements in pounds, and do not contain safety defect reporting information in their owner's manuals. Missing and incorrect information of this nature can lead to improper vehicle loading or tire inflation which could increase the risk of a crash. NHTSA assigned recall number 09V-079 to this matter.

In correspondence with Long Chih, Central Purchasing, LLC (your company) was identified as importing 13,517 of these recalled trailers into the United States. Please remember, per 49 U.S.C. 30102, Definitions, trailers are defined by the U.S. Safety Act as motor vehicles.

Pursuant to Federal law, "A manufacturer of a motor vehicle...shall notify the Secretary [of Transportation delegated to the National Highway Traffic Safety Administration (NHTSA)] and the owners, purchasers, and dealers...if the manufacturer...decides in good faith that the vehicle or equipment does not comply with an applicable motor vehicle safety standard..." [49 U.S.C. § 30118(c)]. Federal law also defines the manufacturer to be "a person...importing motor vehicles or ...equipment for resale." [49 U.S.C. § 30102(a)(5)] The information required in the notification to NHTSA is specified in 49 CFR § 573, Defect and Noncompliance Responsibility and Reports. Sample forms may be found at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. As of the date of this letter, we have not received a report from your company.



This letter serves to remind you of your company's responsibilities if it is an importer of motor vehicles and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliance; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and Long Chih; and an identification of your company's role in the distribution chain for potentially affected trailers. Specifically, please include the date on which you received notification of this matter from Long Chih.

In view of the risk of personal injury, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased these recalled trailers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect and Noncompliance Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and
- e. the approximate date on which the dealer notification will be completed.

**Please note:** As Long Chih has volunteered to conduct the recall remedy, notify owners, and submit quarterly reports, RMD is not requiring this action from your company at this time. However, you must provide a Defect and Noncompliance Information Report. Should Long Chih not be able to properly conduct this safety recall and submit timely reports, these responsibilities will be required of your company.

If your company does not agree with the decision made by Long Chih that these trailers fail to comply with FMVSS, please provide an explanation for your company's position. If your company has not received any of these trailers, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company sold any of these trailers to be resold, please identify the purchaser by name and address.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this

letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ09-002**. A Defect Noncompliance Report guide is available on-line to assist you at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,



George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

**APR 23 2009**

Mr. Chad Schulz  
Menard, Inc.  
5106 Old Mill Center  
Eau Claire, WI 54703

NVS-215aa  
EQ09-002  
09V-079

**Attn: Compliance Dept.**

Dear Mr. Chad Schulz,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you imported and to remind you of your responsibilities under Federal law.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 09V-079. In a letter dated March 4, 2009 Long Chih Industrial Co LTD (Long Chih) reported that certain trailers, produced between September 1, 20005 and December 31, 2008, do not display a tire placard as required by Federal Motor Vehicle Safety Standard No. 110, "Tire Selection and Rims". These trailers also lack proper GVWR/GAWR weight ratings on the certification label, do not indicate the weight measurements in pounds, and do not contain safety defect reporting information in their owner's manuals. Missing and incorrect information of this nature can lead to improper vehicle loading or tire inflation which could increase the risk of a crash. NHTSA assigned recall number 09V-079 to this matter.

In correspondence with Long Chih, Menard, Inc. (your company) was identified as importing 2,957 of these recalled trailers into the United States. Please remember, per 49 U.S.C. 30102, Definitions, trailers are defined by the U.S. Safety Act as motor vehicles.

Pursuant to Federal law, "A manufacturer of a motor vehicle...shall notify the Secretary [of Transportation delegated to the National Highway Traffic Safety Administration (NHTSA)] and the owners, purchasers, and dealers...if the manufacturer...decides in good faith that the vehicle or equipment does not comply with an applicable motor vehicle safety standard..." [49 U.S.C. § 30118(c)]. Federal law also defines the manufacturer to be "a person...importing motor vehicles or ...equipment for resale." [49 U.S.C. § 30102(a)(5)] The information required in the notification to NHTSA is specified in 49 CFR § 573, Defect and Noncompliance Responsibility and Reports. Sample forms may be found at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. As of the date of this letter, we have not received a report from your company.



This letter serves to remind you of your company's responsibilities if it is an importer of motor vehicles and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliance; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and Long Chih; and an identification of your company's role in the distribution chain for potentially affected trailers. Specifically, please include the date on which you received notification of this matter from Long Chih.

In view of the risk of personal injury, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased these recalled trailers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect and Noncompliance Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and
- e. the approximate date on which the dealer notification will be completed.

**Please note:** As Long Chih has volunteered to conduct the recall remedy, notify owners, and submit quarterly reports, RMD is not requiring this action from your company at this time. However, you must provide a Defect and Noncompliance Information Report. Should Long Chih not be able to properly conduct this safety recall and submit timely reports, these responsibilities will be required of your company.

If your company does not agree with the decision made by Long Chih that these trailers fail to comply with FMVSS, please provide an explanation for your company's position. If your company has not received any of these trailers, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company sold any of these trailers to be resold, please identify the purchaser by name and address.

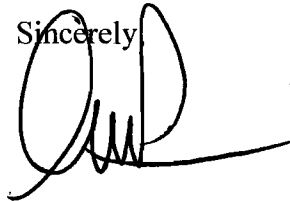
You must respond in writing to this letter. This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this

letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ09-002**. A Defect Noncompliance Report guide is available on-line to assist you at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely



George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**APR 23 2009**

Mr. Brent Starnes  
Northern Tool Equipment Co., Ltd.  
2800 Southcross Drive  
Burnsville, MN 55337

NVS-215aa  
EQ09-002  
09V-079

**Attn: Compliance Dept.**

Dear Mr. Brent Starnes,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you imported and to remind you of your responsibilities under Federal law.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 09V-079. In a letter dated March 4, 2009 Long Chih Industrial Co LTD (Long Chih) reported that certain trailers, produced between September 1, 20005 and December 31, 2008, do not display a tire placard as required by Federal Motor Vehicle Safety Standard No. 110, "Tire Selection and Rims". These trailers also lack proper GVWR/GAWR weight ratings on the certification label, do not indicate the weight measurements in pounds, and do not contain safety defect reporting information in their owner's manuals. Missing and incorrect information of this nature can lead to improper vehicle loading or tire inflation which could increase the risk of a crash. NHTSA assigned recall number 09V-079 to this matter.

In correspondence with Long Chih, Northern Tool Equipment Co., Ltd. (your company) was identified as importing 21,131 of these recalled trailers into the United States. Please remember, per 49 U.S.C. 30102, Definitions, trailers are defined by the U.S. Safety Act as motor vehicles.

Pursuant to Federal law, "A manufacturer of a motor vehicle...shall notify the Secretary [of Transportation delegated to the National Highway Traffic Safety Administration (NHTSA)] and the owners, purchasers, and dealers...if the manufacturer...decides in good faith that the vehicle or equipment does not comply with an applicable motor vehicle safety standard..." [49 U.S.C. § 30118(c)]. Federal law also defines the manufacturer to be "a person...importing motor vehicles or ...equipment for resale." [49 U.S.C. § 30102(a)(5)] The information required in the notification to NHTSA is specified in 49 CFR § 573, Defect and Noncompliance Responsibility and Reports. Sample forms may be found at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. As of the date of this letter, we have not received a report from your company.



This letter serves to remind you of your company's responsibilities if it is an importer of motor vehicles and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliance; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and Long Chih; and an identification of your company's role in the distribution chain for potentially affected trailers. Specifically, please include the date on which you received notification of this matter from Long Chih.

In view of the risk of personal injury, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased these recalled trailers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect and Noncompliance Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
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- e. the approximate date on which the dealer notification will be completed.

**Please note:** As Long Chih has volunteered to conduct the recall remedy, notify owners, and submit quarterly reports, RMD is not requiring this action from your company at this time. However, you must provide a Defect and Noncompliance Information Report. Should Long Chih not be able to properly conduct this safety recall and submit timely reports, these responsibilities will be required of your company.

If your company does not agree with the decision made by Long Chih that these trailers fail to comply with FMVSS, please provide an explanation for your company's position. If your company has not received any of these trailers, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company sold any of these trailers to be resold, please identify the purchaser by name and address.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this

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If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ09-002**. A Defect Noncompliance Report guide is available on-line to assist you at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,



George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

**APR 23 2009**

Mr. Greg Zash  
Bi-Mart Corporation  
220 S. Seneca  
Eugene, OR 97402

NVS-215aa  
EQ09-002  
09V-079

**Attn: Compliance Dept.**

Dear Mr. Greg Zash,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you imported and to remind you of your responsibilities under Federal law.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 09V-079. In a letter dated March 4, 2009 Long Chih Industrial Co LTD (Long Chih) reported that certain trailers, produced between September 1, 2005 and December 31, 2008, do not display a tire placard as required by Federal Motor Vehicle Safety Standard No. 110, "Tire Selection and Rims". These trailers also lack proper GVWR/GAWR weight ratings on the certification label, do not indicate the weight measurements in pounds, and do not contain safety defect reporting information in their owner's manuals. Missing and incorrect information of this nature can lead to improper vehicle loading or tire inflation which could increase the risk of a crash. NHTSA assigned recall number 09V-079 to this matter.

In correspondence with Long Chih, Bi-Mart Corporation (your company) was identified as importing 3,800 of these recalled trailers into the United States. Please remember, per 49 U.S.C. 30102, Definitions, trailers are defined by the U.S. Safety Act as motor vehicles.

Pursuant to Federal law, "A manufacturer of a motor vehicle...shall notify the Secretary [of Transportation delegated to the National Highway Traffic Safety Administration (NHTSA)] and the owners, purchasers, and dealers...if the manufacturer...decides in good faith that the vehicle or equipment does not comply with an applicable motor vehicle safety standard..." [49 U.S.C. § 30118(c)]. Federal law also defines the manufacturer to be "a person...importing motor vehicles or ...equipment for resale." [49 U.S.C. § 30102(a)(5)] The information required in the notification to NHTSA is specified in 49 CFR § 573, Defect and Noncompliance Responsibility and Reports. Sample forms may be found at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. As of the date of this letter, we have not received a report from your company.



This letter serves to remind you of your company's responsibilities if it is an importer of motor vehicles and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliance; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and Long Chih; and an identification of your company's role in the distribution chain for potentially affected trailers. Specifically, please include the date on which you received notification of this matter from Long Chih.

In view of the risk of personal injury, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased these recalled trailers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect and Noncompliance Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and
- e. the approximate date on which the dealer notification will be completed.

**Please note:** As Long Chih has volunteered to conduct the recall remedy, notify owners, and submit quarterly reports, RMD is not requiring this action from your company at this time. However, you must provide a Defect and Noncompliance Information Report. Should Long Chih not be able to properly conduct this safety recall and submit timely reports, these responsibilities will be required of your company.

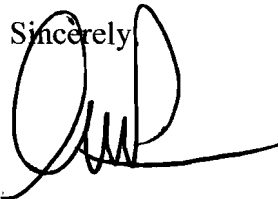
If your company does not agree with the decision made by Long Chih that these trailers fail to comply with FMVSS, please provide an explanation for your company's position. If your company has not received any of these trailers, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company sold any of these trailers to be resold, please identify the purchaser by name and address.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this

letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ09-002**. A Defect Noncompliance Report guide is available on-line to assist you at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,  


George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**APR 23 2009**

Ms. Jennifer Alton  
Fred Meyer Stores, Inc.  
3800 SE, 22nd Ave  
Portland, OR 97202

NVS-215aa  
EQ09-002  
09V-079

**Attn: Compliance Dept.**

Dear Ms. Jennifer Alton,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you imported and to remind you of your responsibilities under Federal law.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 09V-079. In a letter dated March 4, 2009 Long Chih Industrial Co LTD (Long Chih) reported that certain trailers, produced between September 1, 2005 and December 31, 2008, do not display a tire placard as required by Federal Motor Vehicle Safety Standard No. 110, "Tire Selection and Rims". These trailers also lack proper GVWR/GAWR weight ratings on the certification label, do not indicate the weight measurements in pounds, and do not contain safety defect reporting information in their owner's manuals. Missing and incorrect information of this nature can lead to improper vehicle loading or tire inflation which could increase the risk of a crash. NHTSA assigned recall number 09V-079 to this matter.

In correspondence with Long Chih, Fred Meyer Stores, Inc. (your company) was identified as importing 8,571 of these recalled trailers into the United States. Please remember, per 49 U.S.C. 30102, Definitions, trailers are defined by the U.S. Safety Act as motor vehicles.

Pursuant to Federal law, "A manufacturer of a motor vehicle...shall notify the Secretary [of Transportation delegated to the National Highway Traffic Safety Administration (NHTSA)] and the owners, purchasers, and dealers...if the manufacturer...decides in good faith that the vehicle or equipment does not comply with an applicable motor vehicle safety standard..." [49 U.S.C. § 30118(c)]. Federal law also defines the manufacturer to be "a person...importing motor vehicles or ...equipment for resale." [49 U.S.C. § 30102(a)(5)] The information required in the notification to NHTSA is specified in 49 CFR § 573, Defect and Noncompliance Responsibility and Reports. Sample forms may be found at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. As of the date of this letter, we have not received a report from your company.



This letter serves to remind you of your company's responsibilities if it is an importer of motor vehicles and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliance; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and Long Chih; and an identification of your company's role in the distribution chain for potentially affected trailers. Specifically, please include the date on which you received notification of this matter from Long Chih.

In view of the risk of personal injury, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased these recalled trailers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect and Noncompliance Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and
- e. the approximate date on which the dealer notification will be completed.

**Please note:** As Long Chih has volunteered to conduct the recall remedy, notify owners, and submit quarterly reports, RMD is not requiring this action from your company at this time. However, you must provide a Defect and Noncompliance Information Report. Should Long Chih not be able to properly conduct this safety recall and submit timely reports, these responsibilities will be required of your company.


If your company does not agree with the decision made by Long Chih that these trailers fail to comply with FMVSS, please provide an explanation for your company's position. If your company has not received any of these trailers, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company sold any of these trailers to be resold, please identify the purchaser by name and address.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this

letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ09-002**. A Defect Noncompliance Report guide is available on-line to assist you at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,  


George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

**APR 23 2009**

Sir or Madam  
Haskell Corp.  
1001 Meador Ave  
Bellingham, WA 98229

NVS-215aa  
EQ09-002  
09V-079

**Attn: Compliance Dept.**

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you imported and to remind you of your responsibilities under Federal law.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 09V-079. In a letter dated March 4, 2009 Long Chih Industrial Co LTD (Long Chih) reported that certain trailers, produced between September 1, 2005 and December 31, 2008, do not display a tire placard as required by Federal Motor Vehicle Safety Standard No. 110, "Tire Selection and Rims". These trailers also lack proper GVWR/GAWR weight ratings on the certification label, do not indicate the weight measurements in pounds, and do not contain safety defect reporting information in their owner's manuals. Missing and incorrect information of this nature can lead to improper vehicle loading or tire inflation which could increase the risk of a crash. NHTSA assigned recall number 09V-079 to this matter.

Haskell Corp. (your company) was identified as importing 10 of these recalled trailers into the United States. Please remember, per 49 U.S.C. 30102, Definitions, trailers are defined by the U.S. Safety Act as motor vehicles.

Pursuant to Federal law, "A manufacturer of a motor vehicle...shall notify the Secretary [of Transportation delegated to the National Highway Traffic Safety Administration (NHTSA)] and the owners, purchasers, and dealers...if the manufacturer...decides in good faith that the vehicle or equipment does not comply with an applicable motor vehicle safety standard..." [49 U.S.C. § 30118(c)]. Federal law also defines the manufacturer to be "a person...importing motor vehicles or ...equipment for resale." [49 U.S.C. § 30102(a)(5)] The information required in the notification to NHTSA is specified in 49 CFR § 573, Defect and Noncompliance Responsibility and Reports. Sample forms may be found at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. As of the date of this letter, we have not received a report from your company.



This letter serves to remind you of your company's responsibilities if it is an importer of motor vehicles and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliance; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and Long Chih; and an identification of your company's role in the distribution chain for potentially affected trailers. Specifically, please include the date on which you received notification of this matter from Long Chih.

In view of the risk of personal injury, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased these recalled trailers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect and Noncompliance Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and
- e. the approximate date on which the dealer notification will be completed.

**Please note:** As Long Chih has volunteered to conduct the recall remedy, notify owners, and submit quarterly reports, RMD is not requiring this action from your company at this time. However, you must provide a Defect and Noncompliance Information Report. Should Long Chih not be able to properly conduct this safety recall and submit timely reports, these responsibilities will be required of your company.

If your company does not agree with the decision made by Long Chih that these trailers fail to comply with FMVSS, please provide an explanation for your company's position. If your company has not received any of these trailers, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company sold any of these trailers to be resold, please identify the purchaser by name and address.

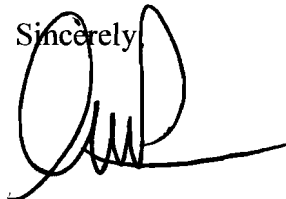
You must respond in writing to this letter. This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this

letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ09-002**. A Defect Noncompliance Report guide is available on-line to assist you at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,



George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures



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

1200 New Jersey Avenue SE  
Washington, DC 20590

**APR 23 2009**

Sir or Madam  
State Trailer Supply  
3600 S Redwood Rd  
Salt Lake City, UT 84119

NVS-215aa  
EQ09-002  
09V-079

**Attn: Compliance Dept.**

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you imported and to remind you of your responsibilities under Federal law.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 09V-079. In a letter dated March 4, 2009 Long Chih Industrial Co LTD (Long Chih) reported that certain trailers, produced between September 1, 2005 and December 31, 2008, do not display a tire placard as required by Federal Motor Vehicle Safety Standard No. 110, "Tire Selection and Rims". These trailers also lack proper GVWR/GAWR weight ratings on the certification label, do not indicate the weight measurements in pounds, and do not contain safety defect reporting information in their owner's manuals. Missing and incorrect information of this nature can lead to improper vehicle loading or tire inflation which could increase the risk of a crash. NHTSA assigned recall number 09V-079 to this matter.

State Trailer Supply (your company) was identified as importing 100 of these recalled trailers into the United States. Please remember, per 49 U.S.C. 30102, Definitions, trailers are defined by the U.S. Safety Act as motor vehicles.

Pursuant to Federal law, "A manufacturer of a motor vehicle...shall notify the Secretary [of Transportation delegated to the National Highway Traffic Safety Administration (NHTSA)] and the owners, purchasers, and dealers...if the manufacturer...decides in good faith that the vehicle or equipment does not comply with an applicable motor vehicle safety standard..." [49 U.S.C. § 30118(c)]. Federal law also defines the manufacturer to be "a person...importing motor vehicles or ...equipment for resale." [49 U.S.C. § 30102(a)(5)] The information required in the notification to NHTSA is specified in 49 CFR § 573, Defect and Noncompliance Responsibility and Reports. Sample forms may be found at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. As of the date of this letter, we have not received a report from your company.



This letter serves to remind you of your company's responsibilities if it is an importer of motor vehicles and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliance; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and Long Chih; and an identification of your company's role in the distribution chain for potentially affected trailers. Specifically, please include the date on which you received notification of this matter from Long Chih.

In view of the risk of personal injury, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased these recalled trailers. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect and Noncompliance Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and
- e. the approximate date on which the dealer notification will be completed.

**Please note:** As Long Chih has volunteered to conduct the recall remedy, notify owners, and submit quarterly reports, RMD is not requiring this action from your company at this time. However, you must provide a Defect and Noncompliance Information Report. Should Long Chih not be able to properly conduct this safety recall and submit timely reports, these responsibilities will be required of your company.

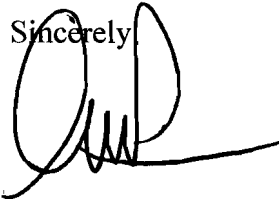
If your company does not agree with the decision made by Long Chih that these trailers fail to comply with FMVSS, please provide an explanation for your company's position. If your company has not received any of these trailers, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company sold any of these trailers to be resold, please identify the purchaser by name and address.

You must respond in writing to this letter. This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this

letter could subject your company 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.

If your company 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ09-002**. A Defect Noncompliance Report guide is available on-line to assist you at <http://www-odi.nhtsa.dot.gov/recalls/forms/index.cfm>. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,  


George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures