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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Alumina, Inc.
7450 Industrial Parkway
Lorain, OH 44053

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:27 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 3355

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 3355

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	LORAIN OH 44053	03/16/12 12:38pm
Depart USPS Sort Facility	CLEVELAND OH 44101	03/16/12
Processed through USPS Sort Facility	CLEVELAND OH 44101	03/16/12 2:12am
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:40pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:25pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 1 4 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Alumina, Inc.
7450 Industrial Parkway
Lorain, OH 44053

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 3 of these defective units to Alumina, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 02 2012

Sent via USPS Certified Mail

President / General Counsel
Anderson Mfg
3360 Hwy. 112 South
Camilla, GA 31730

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:33 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 2761

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 2761

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	CAMILLA GA 31730	03/16/12 2:55pm
Processed through USPS Sort Facility	ALBANY GA 31706	03/16/12 2:57am
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:40pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:25pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 1 4 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Anderson Mfg
3360 Hwy. 112 South
Camilla, GA 31730

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 5 of these defective units to Anderson Mfg (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 02 2012

Sent via USPS Certified Mail

President / General Counsel
Bravo Trailers
19319 County Road 8
Bristol, IN 46507

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:25 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 4574

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 4574

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	BRISTOL IN 46507	03/16/12 11:02am
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:40pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:25pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 1 4 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Bravo Trailers
19319 County Road 8
Bristol, IN 46507

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 1 of these defective units to Bravo Trailers (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Butler Trailer Manufacturing
259 Hockett Dairy Rd
Randleman, NC 27317

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:26 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 3225

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 3225

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	RANDLEMAN NC 27317	03/16/12 12:18pm
Arrival at Unit	RANDLEMAN NC 27317	03/16/12 8:58am
Processed through USPS Sort Facility	GREENSBORO NC 27498	03/15/12 11:19pm
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:40pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:25pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 1 4 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Butler Trailer Manufacturing
259 Hockett Dairy Rd
Randleman, NC 27317

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 4 of these defective units to Butler Trailer Manufacturing (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Felling Trailers
1525 Main St. South
Sauk Centre, MN 56378

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:26 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 4543

Follow Up Flag: Follow up
Flag Status: Flagged

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 4543

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	SAUK CENTRE MN 56378	03/19/12 10:00am
Notice Left (Business Closed)	SAUK CENTRE MN 56378	03/17/12 7:57am
Arrival at Unit	SAUK CENTRE MN 56378	03/17/12 7:44am
Depart USPS Sort Facility	WAITE PARK MN 56387	03/17/12
Processed through USPS Sort Facility	WAITE PARK MN 56387	03/17/12 3:37am
Processed through USPS Sort Facility	WAITE PARK MN 56387	03/16/12 11:58pm
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:40pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:25pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 14 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Felling Trailers
1525 Main St. South
Sauk Centre, MN 56378

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 2 of these defective units to Felling Trailers (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

12/20/11

Dear Valued Customer,

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Flash Equipment Inc.
2061 Whitfield Park Ave.
Sarastota, FL 34243

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:25 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 4604

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 4604

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	SARASOTA FL 34243	03/19/12 11:28am
Depart USPS Sort Facility	SARASOTA FL 34260	03/17/12
Processed through USPS Sort Facility	SARASOTA FL 34260	03/16/12 11:09pm
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:40pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:25pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 14 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Flash Equipment Inc.
2061 Whitfield Park Ave.
Sarastota, FL 34243

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 1 of these defective units to Flash Equipment Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Holden Industries, Inc.
115 8Th Avenue NW
Gravette, AR 72736

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:25 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 4567

Follow Up Flag: Follow up
Flag Status: Flagged

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 4567

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	GRAVETTE AR 72736	03/21/12 11:21am
Notice Left (No Authorized Recipient Available)	GRAVETTE AR 72736	03/17/12 7:57am
Arrival at Unit	GRAVETTE AR 72736	03/17/12 7:44am
Depart USPS Sort Facility	FAYETTEVILLE AR 72701	03/17/12
Processed through USPS Sort Facility	FAYETTEVILLE AR 72701	03/17/12 1:24am
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:40pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:25pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 1 4 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Holden Industries, Inc.
115 8Th Avenue NW
Gravette, AR 72736

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 2 of these defective units to Holden Industries, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Newmar Corp
355 N Delaware St.
Nappanee, IN 46550

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:26 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 3317

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 3317

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	NAPPANEE IN 46550	03/16/12 8:53am
Processed through USPS Sort Facility	SOUTH BEND IN 46624	03/16/12 4:10am
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:40pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:25pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 14 2012

Via USPS Certified Mail
Mr. Ryan Lehman
Newmar Corp
355 N Delaware St.
Nappanee, IN 46550

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Mr. Lehman:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 4 of these defective units to Newmar Corp (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Royal Cargo
51790 CR 39
Middlebury, IN 46540

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:24 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 4703

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 4703

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	MIDDLEBURY IN 46540	03/16/12 10:31am
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:42pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:27pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 14 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Royal Cargo
51790 CR 39
Middlebury, IN 46540

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 1 of these defective units to Royal Cargo (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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.

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If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
United Expressline, Inc.
19985 Co. Rd. #8
Bristol, IN 46507

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:25 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 4581

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 4581

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	BRISTOL IN 46507	03/16/12 11:06am
Processed at USPS Origin Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 8:40pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:25pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 14 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
United Expressline, Inc.
19985 Co. Rd. #8
Bristol, IN 46507

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 2 of these defective units to United Expressline, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
UTC Cargo Group
1741 West 2550 S.
Ogden, UT 84402

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:26 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 4765

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 4765

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	OGDEN UT 84401	03/19/12 12:21pm
Depart USPS Sort Facility	SALT LAKE CITY UT 84199	03/17/12
Processed through USPS Sort Facility	SALT LAKE CITY UT 84199	03/16/12 11:12pm
Processed through USPS Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 10:46pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:27pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 14 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
UTC Cargo Group
1741 West 2550 S.
Ogden, UT 84402

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 1 of these defective units to UTC Cargo Group (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

12/20/11

Dear Valued Customer,

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
UTC Cargo Group
600 Texas Central Parkway
Waco, TX 76712

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 14, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Ansley, Alexander (NHTSA)

From: U.S._Postal_Service_ <U.S._Postal_Service@usps.com>
Sent: Wednesday, May 02, 2012 10:14 AM
To: Ansley, Alexander (NHTSA)
Subject: U.S. Postal Service Track & Confirm email Restoration - 7179 1000 1642 0338 4758

Follow Up Flag: Follow up
Flag Status: Flagged

This is a post-only message. Please do not respond.

ALEX ANSLEY has requested that you receive this restoration information for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal Service.

Label Number: 7179 1000 1642 0338 4758

Service Type: Certified Mail(TM)

Shipment Activity	Location	Date & Time
Delivered	WOODWAY TX 76712	03/16/12 12:24pm
Arrival at Unit	WACO TX 76706	03/16/12 8:49am
Processed through USPS Sort Facility	WACO TX 76702	03/16/12 5:20am
Processed through USPS Sort Facility	CAPITOL HEIGHTS MD 20790	03/14/12 10:46pm
Accepted at USPS Origin Sort Facility	WASHINGTON DC 20590	03/14/12 7:27pm
Electronic Shipping Info Received		03/13/12

USPS has not verified the validity of any email addresses submitted via its online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm services and features, please visit the Frequently Asked Questions (FAQs) section of our Track & Confirm site at http://www.usps.com/shipping/trackandconfirmfaqs.htm

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 14 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
UTC Cargo Group
600 Texas Central Parkway
Waco, TX 76712

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

Dexter reported to NHTSA that it sold 1 of these defective units to UTC Cargo Group (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

P.O. Box 250 • Elkhart, Indiana 46515 • Phone: (574) 295-7888 • Fax: (574) 295-8666 • www.dexteraxle.com

Re.: Electric/Hydraulic (E/H) Actuator Recall

12/20/11

Dear Valued Customer,

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Elite Trailers, Inc.
23200 US HWY 271
Spiro, OK 74959

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On April 10, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 02 2012

Sent via USPS Certified Mail

President / General Counsel
Hefty Trailers
16196 US HWY 82 West
Petty, TX 75470

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On April 10, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

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Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

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Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Lamar Trailers
7271 FM 38 N
Sumner, TX 75486

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On April 10, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Legend Trailers
160 FM 1256
Eustace, TX 75124

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 26, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

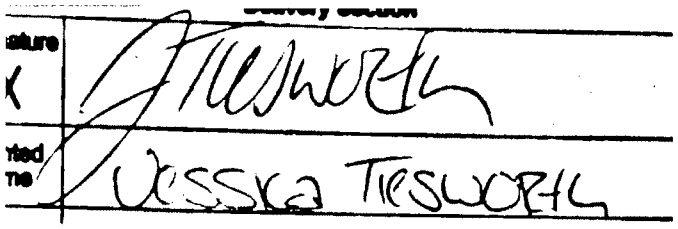
UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

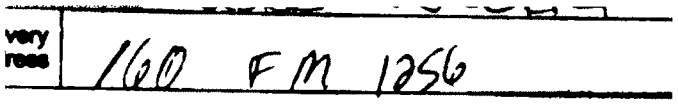
ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0344 2373. The delivery record shows that this item was delivered on 03/29/2012 at 11:14 AM in EUSTACE, TX 75124. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 26 2012

Via USPS Certified Mail
Mr. Jack Simmons
Legend Trailers
160 FM 1256
Eustace, TX 75124

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Mr. Simmons:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, McKelvey Enterprises, reported to NHTSA that it sold 1 of these defective units to Legend Trailers (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 02 2012

Sent via USPS Certified Mail

President / General Counsel
Lone Star Trailers
12900 FM 38 North
Honey Grove, TX 75446

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 26, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

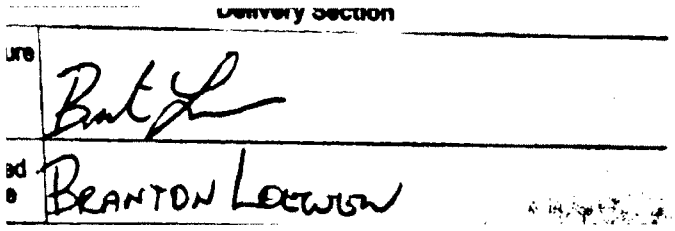
UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

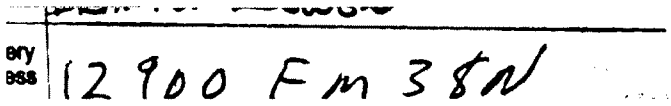
ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0344 2397. The delivery record shows that this item was delivered on 03/29/2012 at 10:31 AM in HONEY GROVE, TX 75446. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 26 2012

Via USPS Certified Mail
Mr. Brenton Lowen
Lone Star Trailers
12900 FM 38 North
Honey Grove, TX 75446

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Mr. Lowen:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, McKelvey Enterprises, reported to NHTSA that it sold 2 of these defective units to Lone Star Trailers (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Performance Trailers
PO Box 463
Mt. Pleasant, TX 75456

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 26, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0344 2441. The delivery record shows that this item was delivered on 03/30/2012 at 01:44 PM in MOUNT PLEASANT, TX 75456. The scanned image of the recipient information is provided below.

Signature of Recipient: 

Address of Recipient: 

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 26 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Performance Trailers
PO Box 463
Mt. Pleasant, TX 75456

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, McKelvey Enterprises, reported to NHTSA that it sold 5 of these defective units to Performance Trailers (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 02 2012

Sent via USPS Certified Mail

President / General Counsel
Stage Coach Trailers
511 County Rd. 4311
Naples, TX 75568

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 26, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

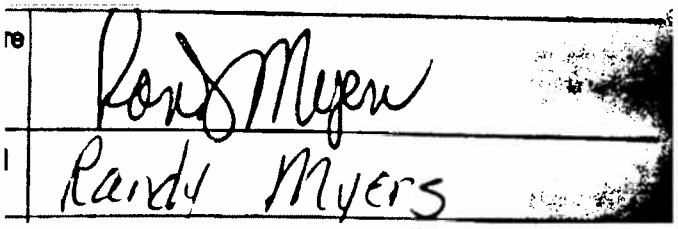
UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

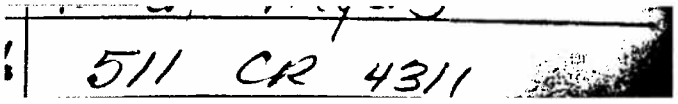
ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0344 2472. The delivery record shows that this item was delivered on 03/29/2012 at 12:27 PM in NAPLES, TX 75568. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 26 2012

Via USPS Certified Mail
Mr. Randy Myers
Stage Coach Trailers
511 County Rd. 4311
Naples, TX 75568

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Mr. Myers:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, McKelvey Enterprises, reported to NHTSA that it sold 1 of these defective units to Stage Coach Trailers (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 02 2012

Sent via USPS Certified Mail

President / General Counsel
Trail Master Trailers
PO Box 218
Cookville, TX 75558

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 26, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

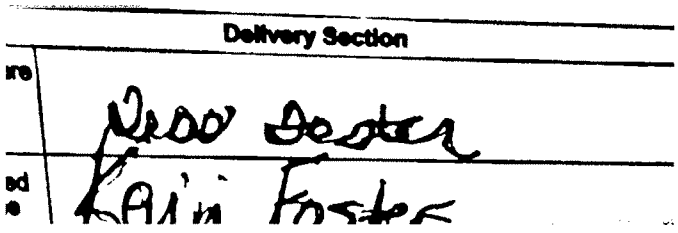
UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

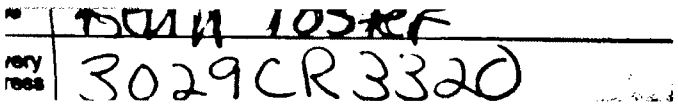
ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0344 2496. The delivery record shows that this item was delivered on 03/29/2012 at 10:36 AM in COOKVILLE, TX 75558. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 26 2012

Via USPS Certified Mail
Mr. Marty Joe Dyke
Trail Master Trailers
PO Box 218
Cookville, TX 75558

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Mr. Dyke:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, McKelvey Enterprises, reported to NHTSA that it sold 14 of these defective units to Trail Master Trailers (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Domatex Inc
842 Buschong St
Houston, TX 77039

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On April 10, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

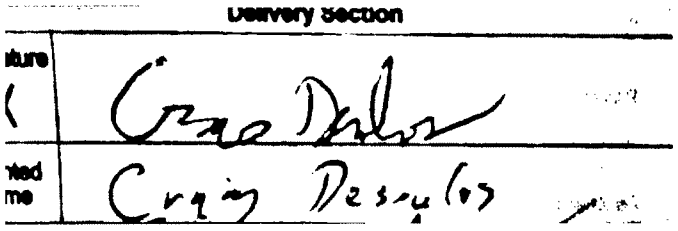
UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0353 2975. The delivery record shows that this item was delivered on 04/17/2012 at 12:00 PM in HOUSTON, TX 77039. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 10 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Domatex Inc
842 Buschong St
Houston, TX 77039

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, Redneck Trailer Supplies, Inc., reported to NHTSA that it sold 6 of these defective units to Domatex Inc (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Fayette Trailer Sales
32 Trailer Lane
Cocolamus, PA 17014

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On April 10, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

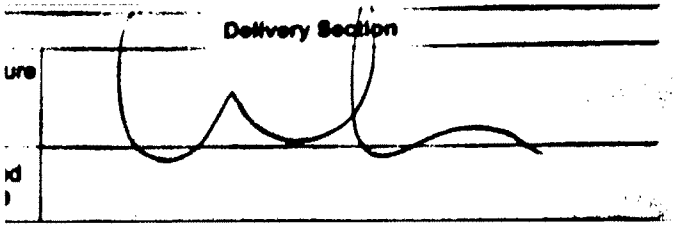
UNITED STATES POSTAL SERVICE

Date: 05/02/2012

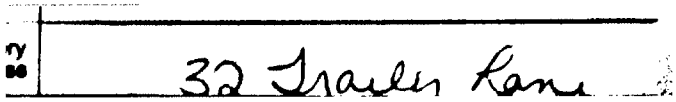
ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0353 2944. The delivery record shows that this item was delivered on 04/12/2012 at 12:28 PM in COCOLAMUS, PA 17014. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 10 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Fayette Trailer Sales
32 Trailer Lane
Cocolamus, PA 17014

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, Redneck Trailer Supplies, Inc., reported to NHTSA that it sold 11 of these defective units to Fayette Trailer Sales (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 02 2012

Sent via USPS Certified Mail

President / General Counsel
Rolls Rite Trailer Inc
3741 Industrial Park Dr
Marianna, FL 32446

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On April 10, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

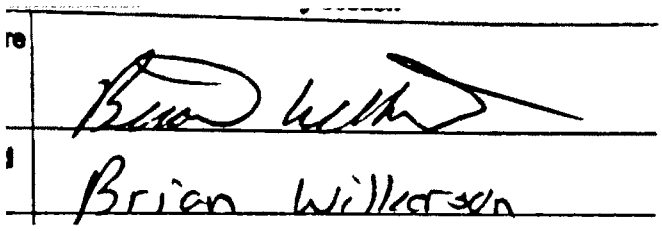
UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

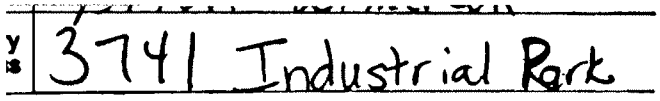
ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0353 2807. The delivery record shows that this item was delivered on 04/13/2012 at 10:38 AM in MARIANNA, FL 32446. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 10 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Rolls Rite Trailer Inc
3741 Industrial Park Dr
Marianna, FL 32446

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, Redneck Trailer Supplies, Inc., reported to NHTSA that it sold 10 of these defective units to Rolls Rite Trailer Inc (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Stoll Trailer Inc
185 Hwy 201
Abbeville, SC 29620

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On April 10, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

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A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

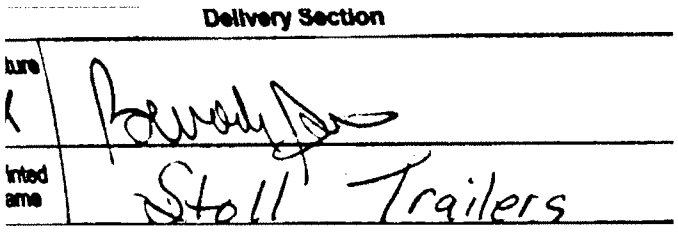
UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

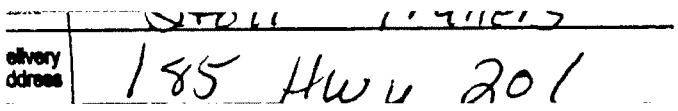
ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0353 2685. The delivery record shows that this item was delivered on 04/13/2012 at 10:18 AM in ABBEVILLE, SC 29620. The scanned image of the recipient information is provided below.

Signature of Recipient:



Address of Recipient:



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 1 0 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Stoll Trailer Inc
185 Hwy 201
Abbeville, SC 29620

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, Redneck Trailer Supplies, Inc., reported to NHTSA that it sold 6 of these defective units to Stoll Trailer Inc (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Wilson Trailer Co
Plant 5 - Hwy 81 N
Yankton, SD 57078

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On April 10, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

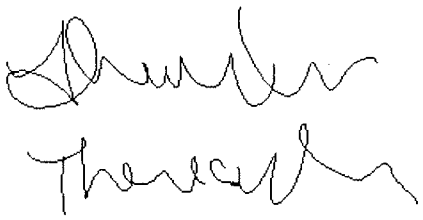
Enclosures

UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0353 2746. The delivery record shows that this item was delivered on 04/13/2012 at 10:41 AM in YANKTON, SD 57078. The scanned image of the recipient information is provided below.

Signature of Recipient: 

Address of Recipient: 795

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 10 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Wilson Trailer Co
Plant 5 - Hwy 81 N
Yankton, SD 57078

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, Redneck Trailer Supplies, Inc., reported to NHTSA that it sold 25 of these defective units to Wilson Trailer Co (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 2 2012

Sent via USPS Certified Mail

President / General Counsel
Pro Trak Trailers
20975 US Hwy 80 East
Wills Point, TX 75169

NVS-215aa
EQ12-003
11E-057

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On March 26, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov.

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.

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 and to request reports and the production of things. It constitutes a new request for information. 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to $6,000 per day, with a maximum of $17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

UNITED STATES POSTAL SERVICE.

Date: 05/02/2012

ALEX ANSLEY:

The following is in response to your 05/02/2012 request for delivery information on your Certified Mail(TM) item number 7179 1000 1642 0344 2458. The delivery record shows that this item was delivered on 03/29/2012 at 10:46 AM in LONGVIEW, TX 75601. The scanned image of the recipient information is provided below.

Signature of Recipient: Mary Thornton

Address of Recipient: P.O. Box 3929

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,

United States Postal Service

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 26 2012

Via USPS Certified Mail
Mr. Seth Davlin
Pro Trak Trailers
20975 US Hwy 80 East
Wills Point, TX 75169

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Mr. Davlin:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, McKelvey Enterprises, reported to NHTSA that it sold 1 of these defective units to Pro Trak Trailers (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk, and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective brake actuator pumps. 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 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 further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 10 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Pro-Trak Trailers Inc
20975 US Hwy 80 East
Wills Point, TX 75169

NVS-215aa
EQ12-003
11E-057

Re: Safety Recall 11E-057

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Dexter Axle Company (Dexter) electric/hydraulic (e/h) brake actuator pumps that the manufacturer has decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

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

In a letter dated December 20, 2011, Dexter notified the NHTSA that it had decided a defect exists in certain e/h brake actuator pumps sold for use on various trailers. Some of these pumps may have not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The e/h brake actuator provides braking power to the trailer brakes. Failure of the actuator can result in the loss of braking effort by the trailer, increasing the risk of a crash. NHTSA assigned recall number 11E-057 to this matter. A copy of the respective notification is enclosed for your information.

An equipment distributor, Redneck Trailer Supplies, Inc., reported to NHTSA that it sold 7 of these defective units to Pro-Trak Trailers Inc (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment

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Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, 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 does not agree with Dexter that a defect exists in these brake actuator pumps, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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.

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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 EQ12-003.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

11E-057
(16 pages)

DEXTER
A Tomkins Company

RECEIVED
By Recall Management Division at 11:57 am, Jan 04, 2012

December 20, 2011

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S W
Washington, D.C. 20590

Dear Sir or Madam:

Dexter Axle Company has determined that a condition, potentially involving motor vehicle safety, may exist in vehicles produced by various trailer manufacturers beginning September, 2011 through December 19, 2011.

Dexter Axle was notified by the supplier of the hydraulic pump used in our electric/hydraulic brake actuator that a quantity of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

Each of these electric/hydraulic actuators carries a unique serial number. We have identified a range of serial numbers which may contain the defective pumps. We have begun notifying the recipients of these units. The total number of units to be inspected and/or recovered is one thousand seven hundred and thirteen (1,713).

Accordingly, Dexter Axle is entering into a voluntary recall campaign. The remedy will consist of recovery and replacement of potentially defective units. We will contact those distributors, dealers and OEM's to which the suspect units were sold and immediately replace those remaining in their inventories. For units that have been installed on trailers and sold to consumers, we will ask the vehicle manufacturers to provide the name and contact information. We will then notify the consumer by mail and direct them to contact Dexter Axle with the serial number of their unit. If the serial number reported is one of the suspect units, they will be directed to the nearest service center to have the unit replaced at no charge.

Please provide Dexter Axle with a written acknowledgement of this letter and the campaign number assigned. If additional information is needed, I can be contacted by phone at 1-574-296-7280 or E-mail to bdunlap@dexteraxle.com.

Sincerely,

William L. Dunlap
Sr. Vice President of Engineering
Dexter Axle Company

attachments:

- List of original recipients
- Letter to original recipients

Re.: Electric/Hydraulic (E/H) Actuator Recall

Dear Valued Customer, 12/20/11

Dexter Axle has been informed by its E/H actuator pump supplier that there is a potential defect with product shipped from September 2011 through December 2011. Our records indicate that we shipped you product during this time period.

Effective immediately, all E/H actuators (K71-650-00 and K71-651-00) should be placed on hold and serial numbers inspected. The serial numbers in question are:

- K71-650-00 (E/H 1000 psi) – serial # DTS11903 to DTS12759
- K71-651-00 (E/H 1600 psi) – serial # DTS13805 to DTS14751

The kit box should be opened and serial number of the unit inspected. The serial number can be found on the E/H actuator label.



Any actuators within this serial number range should be sent back to Dexter Axle. Please contact our Albion, IN order entry department at (260) 636-5311 to arrange the return of the product directly to the Albion plant.

Dexter is concurrently notifying NTHSA of this issue and will be providing further details on a recall campaign.

Carlos Robles
Director of Quality
Dexter Axle Company