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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 09 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Berendsen Fluid Power
401 South Boston
Tulsa, OK 74103

NVS-215aa
EQ12-003
11E-057
12E-003

Re: Safety Recalls 11E-057 and 12E-003

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 trailer brake actuators that two vehicle equipment manufacturers have decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

In a letter dated December 20, 2011, Dexter Axle Company (Dexter) notified the NHTSA that it had decided a defect exists in certain 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 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.

We have now received a similar report from another brake actuator manufacturer. Specifically, in a letter dated January 31, 2012, Carlisle Brake & Friction Company (Carlisle) notified the NHTSA of the same defect it determined to exist in certain HydraStar XL trailer brake actuators it manufactured October 5, 2011, through December 9, 2011. Carlisle specified that the piston pumps installed into its brake actuators did not receive the proper heat treat operation and, as a result, are subject to wear at a higher than normal rate. A copy of this notification is also enclosed for your information. NHTSA assigned recall number 12E-003 to this matter. A copy of this notification is also enclosed for your information.

Both Dexter and Carlisle confirmed that Parker Hannifin Corp., Oildyne Division (Parker Oildyne) manufactured the defective piston pumps used in their brake actuators. In an information request (IR) response dated April 17, 2012, Parker Oildyne noted that it sold 30 of these defective piston pumps to Berendsen Fluid Power (your company) between August 11, 2011 and December 9, 2011. The contents of that IR letter and subsequent Parker Oildyne response can be found on our website, http://www.safercar.gov, by selecting the 'Vehicle Owners' link at the top of the page, then selecting the 'Defect Investigations' link to the left, and entering investigation number 'EQ12003' into the NHTSA Action Number field.

The purpose of this request is to obtain a list of purchasers that were sold these piston pumps so they are made aware of the various safety defect decisions and are able to determine the need for any similar safety recall on products they may have manufactured using the same components. It is also to request your company provide the requisite defect report should it agree that it manufactured and sold or distributed defective motor vehicle equipment to its purchasers. It is further to ascertain whether your company manufactured and sold or distributed any defective equipment in the replacement market for which it may have responsibility for filing a report with NHTSA and conducting a recall campaign. Accordingly, we require the following information:

1. Provide a list of all customers that received the same or similarly defective Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

2. State whether your company manufactured and sold or distributed any equipment containing the defect involved in the aforementioned recalls reports in the replacement market and, if so, provide a list of all customers that received the same or similarly affected Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

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.

Pursuant to Federal law, a manufacturer of motor vehicle equipment 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 that equipment. 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.

If your company incorporated the Parker Oildyne piston pumps into motor vehicle equipment and your company does not agree with Dexter and Carlisle that a safety defect exists in the aforementioned products, your company must submit a written response explaining its decision including all supporting documents, analysis, and/or test reports.

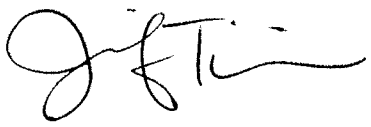
If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information 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

Enclosures

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 09 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Dees Fluid Power
1809 Fashion Court, Suite 110
Joppa, MD 21085

NVS-215aa
EQ12-003
11E-057
12E-003

Re: Safety Recalls 11E-057 and 12E-003

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 trailer brake actuators that two vehicle equipment manufacturers have decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

In a letter dated December 20, 2011, Dexter Axle Company (Dexter) notified the NHTSA that it had decided a defect exists in certain 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 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.

We have now received a similar report from another brake actuator manufacturer. Specifically, in a letter dated January 31, 2012, Carlisle Brake & Friction Company (Carlisle) notified the NHTSA of the same defect it determined to exist in certain HydraStar XL trailer brake actuators it manufactured October 5, 2011, through December 9, 2011. Carlisle specified that the piston pumps installed into its brake actuators did not receive the proper heat treat operation and, as a result, are subject to wear at a higher than normal rate. A copy of this notification is also enclosed for your information. NHTSA assigned recall number 12E-003 to this matter. A copy of this notification is also enclosed for your information.

Both Dexter and Carlisle confirmed that Parker Hannifin Corp., Oildyne Division (Parker Oildyne) manufactured the defective piston pumps used in their brake actuators. In an information request (IR) response dated April 17, 2012, Parker Oildyne noted that it sold 36 of these defective piston pumps to Dees Fluid Power (your company) between August 11, 2011 and December 9, 2011. The contents of that IR letter and subsequent Parker Oildyne response can be found on our website, http://www.safercar.gov, by selecting the 'Vehicle Owners' link at the top of the page, then selecting the 'Defect Investigations' link to the left, and entering investigation number 'EQ12003' into the NHTSA Action Number field.

The purpose of this request is to obtain a list of purchasers that were sold these piston pumps so they are made aware of the various safety defect decisions and are able to determine the need for any similar safety recall on products they may have manufactured using the same components. It is also to request your company provide the requisite defect report should it agree that it manufactured and sold or distributed defective motor vehicle equipment to its purchasers. It is further to ascertain whether your company manufactured and sold or distributed any defective equipment in the replacement market for which it may have responsibility for filing a report with NHTSA and conducting a recall campaign. Accordingly, we require the following information:

1. Provide a list of all customers that received the same or similarly defective Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

2. State whether your company manufactured and sold or distributed any equipment containing the defect involved in the aforementioned recalls reports in the replacement market and, if so, provide a list of all customers that received the same or similarly affected Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

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.

Pursuant to Federal law, a manufacturer of motor vehicle equipment 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 that equipment. 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.

If your company incorporated the Parker Oildyne piston pumps into motor vehicle equipment and your company does not agree with Dexter and Carlisle that a safety defect exists in the aforementioned products, your company must submit a written response explaining its decision including all supporting documents, analysis, and/or test reports.

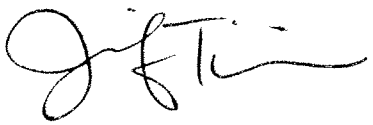
If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information 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

Enclosures

U.S. Department
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**National Highway
Traffic Safety
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1200 New Jersey Avenue SE
Washington, DC 20590

MAY 09 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Hydradyne Hydraulics
2801 Peters Rd.
Harvey, LA 70058

NVS-215aa
EQ12-003
11E-057
12E-003

Re: Safety Recalls 11E-057 and 12E-003

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 trailer brake actuators that two vehicle equipment manufacturers have decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

In a letter dated December 20, 2011, Dexter Axle Company (Dexter) notified the NHTSA that it had decided a defect exists in certain 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 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.

We have now received a similar report from another brake actuator manufacturer. Specifically, in a letter dated January 31, 2012, Carlisle Brake & Friction Company (Carlisle) notified the NHTSA of the same defect it determined to exist in certain HydraStar XL trailer brake actuators it manufactured October 5, 2011, through December 9, 2011. Carlisle specified that the piston pumps installed into its brake actuators did not receive the proper heat treat operation and, as a result, are subject to wear at a higher than normal rate. A copy of this notification is also enclosed for your information. NHTSA assigned recall number 12E-003 to this matter. A copy of this notification is also enclosed for your information.

Both Dexter and Carlisle confirmed that Parker Hannifin Corp., Oildyne Division (Parker Oildyne) manufactured the defective piston pumps used in their brake actuators. In an information request (IR) response dated April 17, 2012, Parker Oildyne noted that it sold 10 of these defective piston pumps to Hydradyne Hydraulics (your company) between August 11, 2011 and December 9, 2011. The contents of that IR letter and subsequent Parker Oildyne response can be found on our website, http://www.safercar.gov, by selecting the 'Vehicle Owners' link at the top of the page, then selecting the 'Defect Investigations' link to the left, and entering investigation number 'EQ12003' into the NHTSA Action Number field.

The purpose of this request is to obtain a list of purchasers that were sold these piston pumps so they are made aware of the various safety defect decisions and are able to determine the need for any similar safety recall on products they may have manufactured using the same components. It is also to request your company provide the requisite defect report should it agree that it manufactured and sold or distributed defective motor vehicle equipment to its purchasers. It is further to ascertain whether your company manufactured and sold or distributed any defective equipment in the replacement market for which it may have responsibility for filing a report with NHTSA and conducting a recall campaign. Accordingly, we require the following information:

1. Provide a list of all customers that received the same or similarly defective Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

2. State whether your company manufactured and sold or distributed any equipment containing the defect involved in the aforementioned recalls reports in the replacement market and, if so, provide a list of all customers that received the same or similarly affected Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

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.

Pursuant to Federal law, a manufacturer of motor vehicle equipment 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 that equipment. 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.

If your company incorporated the Parker Oildyne piston pumps into motor vehicle equipment and your company does not agree with Dexter and Carlisle that a safety defect exists in the aforementioned products, your company must submit a written response explaining its decision including all supporting documents, analysis, and/or test reports.

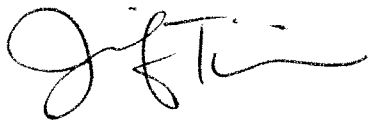
If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information 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

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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
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**National Highway
Traffic Safety
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1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 9 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Ritter Technology
8610 Hawthorne Drive
Erie, PA 16509

NVS-215aa
EQ12-003
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12E-003

Re: Safety Recalls 11E-057 and 12E-003

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 trailer brake actuators that two vehicle equipment manufacturers have decided contain a safety related defect that could cause a vehicle crash. This investigation has been assigned the identification EQ12-003.

In a letter dated December 20, 2011, Dexter Axle Company (Dexter) notified the NHTSA that it had decided a defect exists in certain 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 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.

We have now received a similar report from another brake actuator manufacturer. Specifically, in a letter dated January 31, 2012, Carlisle Brake & Friction Company (Carlisle) notified the NHTSA of the same defect it determined to exist in certain HydraStar XL trailer brake actuators it manufactured October 5, 2011, through December 9, 2011. Carlisle specified that the piston pumps installed into its brake actuators did not receive the proper heat treat operation and, as a result, are subject to wear at a higher than normal rate. A copy of this notification is also enclosed for your information. NHTSA assigned recall number 12E-003 to this matter. A copy of this notification is also enclosed for your information.

Both Dexter and Carlisle confirmed that Parker Hannifin Corp., Oildyne Division (Parker Oildyne) manufactured the defective piston pumps used in their brake actuators. In an information request (IR) response dated April 17, 2012, Parker Oildyne noted that it sold 33 of these defective piston pumps to Ritter Technology (your company) between August 11, 2011 and December 9, 2011. The contents of that IR letter and subsequent Parker Oildyne response can be found on our website, http://www.safercar.gov, by selecting the 'Vehicle Owners' link at the top of the page, then selecting the 'Defect Investigations' link to the left, and entering investigation number 'EQ12003' into the NHTSA Action Number field.

The purpose of this request is to obtain a list of purchasers that were sold these piston pumps so they are made aware of the various safety defect decisions and are able to determine the need for any similar safety recall on products they may have manufactured using the same components. It is also to request your company provide the requisite defect report should it agree that it manufactured and sold or distributed defective motor vehicle equipment to its purchasers. It is further to ascertain whether your company manufactured and sold or distributed any defective equipment in the replacement market for which it may have responsibility for filing a report with NHTSA and conducting a recall campaign. Accordingly, we require the following information:

1. Provide a list of all customers that received the same or similarly defective Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

2. State whether your company manufactured and sold or distributed any equipment containing the defect involved in the aforementioned recalls reports in the replacement market and, if so, provide a list of all customers that received the same or similarly affected Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

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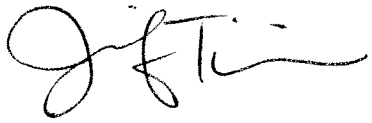
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Chief, Recall Management Division
Office of Defects Investigation
Enforcement

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**National Highway
Traffic Safety
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1200 New Jersey Avenue SE
Washington, DC 20590

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Via USPS Certified Mail
Warranty / Compliance Dept.
Titan Distribution Inc.
2345 East market St.
Des Moines, IA 50317

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EQ12-003
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Re: Safety Recalls 11E-057 and 12E-003

Dear Sir or Madam:

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Both Dexter and Carlisle confirmed that Parker Hannifin Corp., Oildyne Division (Parker Oildyne) manufactured the defective piston pumps used in their brake actuators. In an information request (IR) response dated April 17, 2012, Parker Oildyne noted that it sold 800 of these defective piston pumps to Titan Distribution Inc. (your company) between August 11, 2011 and December 9, 2011. The contents of that IR letter and subsequent Parker Oildyne response can be found on our website, http://www.safercar.gov, by selecting the 'Vehicle Owners' link at the top of the page, then selecting the 'Defect Investigations' link to the left, and entering investigation number 'EQ12003' into the NHTSA Action Number field.

The purpose of this request is to obtain a list of purchasers that were sold these piston pumps so they are made aware of the various safety defect decisions and are able to determine the need for any similar safety recall on products they may have manufactured using the same components. It is also to request your company provide the requisite defect report should it agree that it manufactured and sold or distributed defective motor vehicle equipment to its purchasers. It is further to ascertain whether your company manufactured and sold or distributed any defective equipment in the replacement market for which it may have responsibility for filing a report with NHTSA and conducting a recall campaign. Accordingly, we require the following information:

1. Provide a list of all customers that received the same or similarly defective Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

2. State whether your company manufactured and sold or distributed any equipment containing the defect involved in the aforementioned recalls reports in the replacement market and, if so, provide a list of all customers that received the same or similarly affected Parker Oildyne piston pumps from your company, whether directly or as part of an equipment application, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

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.

Pursuant to Federal law, a manufacturer of motor vehicle equipment 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 that equipment. 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.

If your company incorporated the Parker Oildyne piston pumps into motor vehicle equipment and your company does not agree with Dexter and Carlisle that a safety defect exists in the aforementioned products, your company must submit a written response explaining its decision including all supporting documents, analysis, and/or test reports.

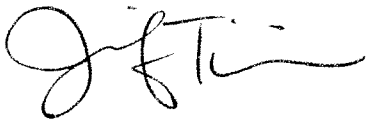
If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information 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

Enclosures