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

AUG 3 0 2012

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail
Mr. Michael L. Roberson
Vice President
Carlisle Brake and Friction Company
6180 Cochran Road
Solon, OH 44139

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

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

Dear Mr. Roberson:

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.

We also received a similar report from your company, Carlisle Brake & Friction Company (Carlisle). Specifically, in a letter dated January 31, 2012, 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. NHTSA assigned recall number 12E-003 to this matter.

The purpose of this request is to obtain a list of purchasers that were sold these brake actuators so they are made aware of this safety recall and are able to determine the need for any similar safety recall. Accordingly, we require the following information:

1. Identify and list all purchasers that purchased the defective brake actuators from Carlisle. For each purchaser provide at a minimum: a company name; address; phone number; contact person; quantity sold to each; sale date; and line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, first purchaser, etc.).

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