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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 0 9 2013

Via USPS Certified Mail
Warranty / Compliance Dept.
Elite Trailer MFG LLC
7700 SW 29TH Street
Oklahoma City, OK 73179

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

Re: Safety Recall 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 electric/hydraulic (e/h) brake actuator pumps that two equipment manufacturers have decided contain a safety related defect that could cause a vehicle crash. The first recall is and was being conducted by Dexter Axle Company (Dexter). The second recall is and was being conducted by Carlisle Brake & Friction Company (Carlisle).

This letter pertains to the recall being conducted by Carlisle.[1]

In a letter dated January 31, 2012, Carlisle notified the NHTSA of the same defect it determined to exist in certain HydraStar and 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.

In February 2013, Redneck Trailer Supplies reported to NHTSA that it sold 17 of these defective units to Elite Trailer MFG LLC (your company) between dates October 20, 2011, and October 20, 2011, 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

[1] We may have contacted you previously regarding the above described Dexter actuator pumps. Thank you for your written response if that is the case. As explained above, however, this request pertains to the safety recall Carlisle is conducting. Accordingly, this constitutes a new request for information for which your response is required.

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 Carlisle 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

RECEIVED
By Recall Management Division at 9:44 am, Feb 01, 2012

12E-003
4 PAGES

Carlisle Companies Incorporated
250 South Clinton Street, Suite 201
Syracuse, New York 13202-1258
(315) 477-9107 • FAX (315) 474-2008

CARLISLE

Michael L. Roberson
Vice President & Assistant General Counsel

January 31, 2012

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
NVS-200, Room W45-306
Washington, D.C. 20590

Re: Part 573 Defect Information Report

Dear Ms. Lewis:

Carlisle Brake & Friction Company (CBF) submits the Defect Information Report pursuant to the requirements of 49 C.F.R. Part 573 relating to a potential safety related defect in certain trailer brake actuators sold by CBF to the aftermarket. CBF will conduct a voluntary safety recall campaign to replace the affected piston pumps.

The information required by Part 573.6 is set forth below.

573.6(c)(1): Manufacturer's Name

Carlisle Brake and Friction Company
6180 Cochran Road
Solon, OH 44139

573.6 c 2 iii : Identification of Motor Vehicle E ui ment

Generic Name	Brand Name	Part and Serial Numbers	Inclusive Dates of Manufacture
Trailer Brake Actuator	Carlisle HydraStar Trailer Brake Actuator	HBA-10 #323896 thru #324093 HB 1 #5151 thru #517531 HBA-16 #715739 thru #717001	October 5, 2011- December 9 01
Trailer Brake Actuator	Carlisle HydraStar XL Trailer Brake Actuator	HBA-10 #517532 thru #517533 HBA-12 #602058 thru #602085 HBA-16 #623888 thru #623894	October 5, 2011- December 9, 2011

573.6 c 2 iv : Manufacturer's Name of Affected Com onent and Counti of Ori in

Component: Piston pump manufactured by Parker Oildyne

Manufacturer's address: Parker Oildyne
5520 North Highway 169
New Hope, MN 55428

573.6(c)(3): Total Number of Items of Equipment Potentially Containing the Defect

1,165 HydraStar and HydraStar XL Trailer Brake Actuators are potentially affected in the United States.

573.6(c)(4): Percentage of Items of Equipment Estimated to Actually Contain the Defect

The percentage of vehicles that are projected to actually contain the issues described below is 100%.

573.6(c)(5): Description of Defect

One of the rotating components in the hydraulic pump for the actuator missed a heat treat operation. As a result, it is subject to wear at a higher than normal rate. As the component wears, the load on the electric motor that powers the unit increases until either the fuse that protects the motor fails or the motor itself fails. In either case, a loss of trailer braking may occur.

573.6(c)(6): Chronology of Principal Events

Parker Oildyne informed CBF on or about December 14, 2011 that there is a potential problem regarding piston pumps sold to CBF and installed in CBF trailer brake actuators, and that Parker Oildyne would conduct an appropriate field campaign to replace the affected units. On January 20, 2012, CBF informed its Hydrastar and Hydrastar SL Customers of the problem and requested that the affected units be contained and/or removed from service. Upon further internal review, CBF determined that the campaign requires notification to NHTSA and that a safety related recall should be conducted

573.6(c)(8)(i): Remedy Program

CBF will replace affected units in service with new actuators, and will replace the defective piston pump in actuators not yet placed into service.

573.6(c)(8)(ii): Estimated Date of Owner and Dealer Notification

CBF will send a formal notification of the safety related recall to its customers upon approval by NHTSA of the owner notification letter. On or about January 20, 2012, CBF notified its customers of a potential problem with the trailer brake actuators and asked its customers to contain and or remove from service all potentially affected product.

573.6(c)(10): Dealer and Owner Communications

CBF is simultaneously submitting a draft customer communication for review by the agency.

573.6(c)(11): Manufacturer's Campaign Identification Number

The CBF Recall Campaign Number will be provided when available.

Should you have any questions, please do not hesitate to contact Michael Roberson at mroberson@carlisle.com or 315 477-9107.

Sincerely,

Michael L. Roberson
Vice President and
Assistant General Counsel

DRAFT Part 577 letter

Safety Recall No. 12E-

This Notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. This will follow all correspondence regarding this subject.

Carlisle Brake and Friction has determined that a defect which relates to motor vehicle safety exists in the internal hydraulic pump produced by Parker Oildyne and installed in certain HydraStar and HydraStar XL trailer brake actuators.

One of the rotating components in the hydraulic pump for the actuator missed a heat treat operation. As a result, it is subject to wear at a higher than normal rate. As the component wears, the load on the electric motor that powers the unit increases until either the fuse that protects the motor fails or the motor itself fails. In either case, a loss of trailer braking may occur.

All units with serial numbers that fall within the range listed below should be contained and/or removed from service immediately. The affected units were manufactured between October and December 2011:

Generic Name	**Brand Name**	**Part and Serial Numbers**	**Inclusive Dates of Manufacture**
Trailer Brake Actuator	Carlisle HydraStar Trailer Brake Actuator	HBA-10 #323896 thru #324093 HBA-12 #515122 thru #517531 HBA-16 #715739 thru #717001	October 5, 2011-December 9, 2011
Trailer Brake Actuator	Carlisle HydraStar XL Trailer Brake Actuator	HBA-10 #517532 thru #517533 HBA-12 #602058 thru #602085 HBA-16 #623888 thru #623894	October 5, 2011-December 9, 2011

Carlisle Brake and Friction will repair or replace affected units free of charge. Please contact our Customer Service Department between 8 am and 5 pm Eastern, Mon-Fri, at (800)-933-1001 to arrange for the replacement of affected units. If you have previously paid for a replacement of the unit as a result of this defect, Carlisle Brake and Friction will reimburse the cost of such replacement based on your receipts.

Your safety is important to us. We regret any inconvenience this action may cause.

Sincerely,

Carlisle Brake and Friction