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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 23 2013

Sent via USPS Certified Mail

President / General Counsel
Ameritrail, Inc.
P.O. Box 38904
Houston, TX 77238

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

Subject: Second Request for Information- Response Required

Dear Sir or Madam:

On January 31, 2013, 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 defective Carlisle Brake & Friction Company brake actuators that were sold to your company for further distribution. 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.

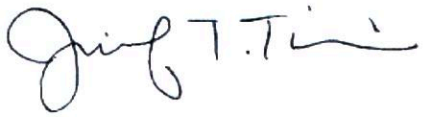
If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Your company must submit supporting information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

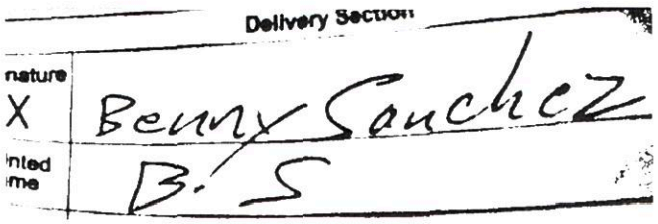
UNITED STATES POSTAL SERVICE

Date Produced: 02/11/2013

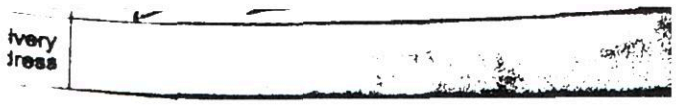
US DEPARTMENT OF TRANSPORTATION - NATION

The following is the delivery information for Certified Mail™ item number 7179 1000 1647 6907 5992. Our records indicate that this item was delivered on 02/06/2013 at 04:15 p.m. in HOUSTON, TX, 77088. 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 Service representative.

Sincerely,

United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: NHTSA NVS-215-Attn: Warranty /

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

1200 New Jersey Avenue SE
Washington, DC 20590

JAN 31 2013

Via USPS Certified Mail
Warranty Compliance Dept.
Ameritrail, Inc.
P.O. Box 38904
Houston, TX 77238

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 November 2012, Carlisle reported to NHTSA that it sold 20 of these defective units to Ameritrail, Inc. (your company) between October 28, 2011, and October 31, 2011, for possible distribution to trailer manufacturers.

The purpose of this request is to obtain a list of purchasers that were sold these brake actuator pumps 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:

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[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.

1. Provide a list of all customers that received the same or similarly affected Carlisle e/h brake actuator pumps 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.

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

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



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)(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