Southwest Wheel Co.

April 1, 2012

Jennifer Timian
Chief Recall Management Division
Office of Defects Investigation
Enforcement

RE: Safety Recall 11E-057
ID Number EQ12-003

Dear Sir or Madam:

In response to your letter concerning a safety recall from Dexter Axle (11E-057). We are complying by submitting this list of the affected actuators and the customers that they were sold to. We have accounted for 36 of these actuators that fall within the range of numbers supplied by Dexter Axle. We either returned new affected stock or contacted customers that purchased between the dates given to us by Dexter Axle and replaced all of the affected serial numbers. The remaining thirty six units that were sold to Bloomer Trailers were directly coordinated with Dexter Axle for recall and replacements. We were not informed by Dexter Axle or Bloomer Trailers on their affected serial numbers. As of today we have accounted for all of the serial numbers affected by this recall.

If you have any questions regarding our participation in this recall, please call me at 210.247.2161 or by e-mail at bfarmer@swcompanies.net .

Best regards,
Bob Farmer
Procurement Specialist
Southwest Wheel Co.
343 Gembler Rd.
San Antonio, TX 78219
210.226.0301

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 27 2012

Via USPS Certified Mail
Warranty / Compliance Dept.
Southwest Wheel Company
343 Gembler Rd
San Antonio, TX 78219

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.

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 72 of these defective units to Southwest Wheel Company (your company) 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:

1. Provide a list of all customers that received the same or similarly affected Dexter 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

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

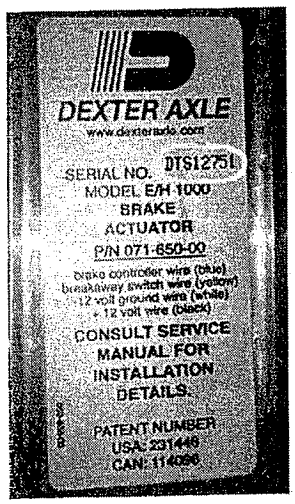
Dear Valued Customer, 12/20/11

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

18-025873	GRANTS PASS	OR	10/10/2011 SIX ROBBLEES GRANTS PASS	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	1
15-017501	MISSOULA	MT	10/17/2011 SIX ROBBLEES MISSOULA	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
11253	SAN ANTONIO	TX	9/23/2011 SOUTHWEST WHEEL CO	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	12
11351	SAN ANTONIO	TX	10/14/2011 SOUTHWEST WHEEL CO	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	12
11540	SAN ANTONIO	TX	11/11/2011 SOUTHWEST WHEEL CO	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	12
11587	SAN ANTONIO	TX	11/11/2011 SOUTHWEST WHEEL CO	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	12
11624	SAN ANTONIO	TX	11/23/2011 SOUTHWEST WHEEL CO	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	12
11790	SAN ANTONIO	TX	12/16/2011 SOUTHWEST WHEEL CO	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	12
0013312-SHORTA	WOODSTOCK		9/27/2011 STANDARD AXLE COMPANY	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	2
A2011412	CALGARY		9/23/2011 STANDEN'S LTD	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	12
A2011524	CALGARY		11/28/2011 STANDEN'S LTD	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	12
124-89664	EDMONTON		9/2/2011 T.W. DISTRIBUTION / DIV OF UAP	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
280-97606	LONGUEUIL		9/14/2011 T.W. DISTRIBUTION / DIV OF UAP	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	2
124-90025	EDMONTON		10/5/2011 T.W. DISTRIBUTION / DIV OF UAP	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
124-90386	EDMONTON		11/4/2011 T.W. DISTRIBUTION / DIV OF UAP	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	3
124-90431	EDMONTON		11/7/2011 T.W. DISTRIBUTION / DIV OF UAP	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	2
283-AK05092	MISSISSAUGA		11/10/2011 T.W. DISTRIBUTION / DIV OF UAP	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	1
124-90680	EDMONTON		12/1/2011 T.W. DISTRIBUTION / DIV OF UAP	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	2
124-90910	EDMONTON		12/19/2011 T.W. DISTRIBUTION / DIV OF UAP	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
00216343	ODESSA	TX	9/14/2011 TEXTRAIL, INC.	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	2
00216534	ODESSA	TX	10/21/2011 TEXTRAIL, INC.	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	12
0015814	W. PALM BEACH	FL	11/1/2011 THE EXPEDITER, INC	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	2
0015957	W. PALM BEACH	FL	12/5/2011 THE EXPEDITER, INC	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
0015957	W. PALM BEACH	FL	12/5/2011 THE EXPEDITER, INC	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	2
0015987	W. PALM BEACH	FL	12/6/2011 THE EXPEDITER, INC	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	2
13221	INDIANAPOLIS	IN	11/28/2011 THE WAYMIRE GROUP	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
13266	INDIANAPOLIS	IN	12/7/2011 THE WAYMIRE GROUP	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	1
13268	INDIANAPOLIS	IN	12/7/2011 THE WAYMIRE GROUP	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
0002262	LAS VEGAS	NV	9/12/2011 TRAILER TECH	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	1
63-230540	LOUISVILLE	KY	9/7/2011 TRUCKPRO	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	1
63-233124	LOUISVILLE	KY	10/5/2011 TRUCKPRO	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	2
051-150759	VALLEY VIEW	OH	9/26/2011 TRUCKPRO	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
51-154763	VALLEY VIEW	OH	10/11/2011 TRUCKPRO	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
0101058272	MEMPHIS	TN	10/6/2011 TRUCKPRO	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	2
0043432	BRISTOL	IN	10/3/2011 UNITED EXPRESSLINE, INC.	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	1
0043814	BRISTOL	IN	11/7/2011 UNITED EXPRESSLINE, INC.	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	1
123116-TX	WACO	TX	12/12/2011 UTC CARGO GROUP - TX	K71-650-00	ELEC/HYD ACTUATOR E/H-1000	1
34136-UT	OGDEN	UT	11/18/2011 UTC CARGO GROUP - UT	K71-651-00	ELEC/HYD ACTUATOR - E/H-1600 E/H 1600	1

			SERIAL #	13805/14751									
INVOICE NO	DATE		ACCT. NO.	NAME	PHONE	CONTACT	DATE	S/N					
3730222	12/6/2011	DXPK71-651-00	4634	VAN SMITH	210.724.7723	RETURNED	29-Dec	NOT RECORDED	REPLACED FROM STOCK				
3729122	11/17/2011	DXPK71-651-00	12517	SOUTHWEST GOOSENECK	210.226.0301	RETURNED	29-Dec	14447	REPLACED FROM STOCK				
3728987	11/16/2011	DXPK71-651-00	16912	5 STAR DESIGNS	210.365.9273	RETURNED	29-Dec	14196	REPLACED FROM STOCK				
3727681	10/27/2011	DXPK71-651-00	23279	NATHAN W. WEYNARD	210..413.7738	RETURNED	29-Dec	14155	REPLACED FROM STOCK				
3726419	10/10/2011	DXPK71-651-00	24955	RICHARD ROBLES INC	210.844.9089	RETURNED	29-Dec	13878	REPLACED FROM STOCK				
3726152	10/6/2011	DXPK71-651-00	25860	SEGUIN DIESEL TRK SVC	830.303.9942	Ernie	11-Jan	UNKNOWN	ADVISED CUSTOMER				
3731123	12/21/2011	DXPK71-651-00	12460-1	BLOOMER TRAILERS	254.947.8211	DEXTER AXLE	29-Dec	NO RECORD	ADVISED OEM				
3730260	12/7/2011	DXPK71-651-00	12460-1	BLOOMER TRAILERS	254.947-8211	DEXTER AXLE	29-Dec	NO RECORD	ADVISED OEM				
3729745	11/30/2011	DXPK71-651-00	12460-1	BLOOMER TRAILERS	254.947.8211	DEXTER AXLE	29-Dec	NO RECORD	ADVISED OEM				
3728962	11/16/2011	DXPK71-651-00	12460-1	BLOOMER TRAILERS	254.947.8212	DEXTER AXLE	29-Dec	NO RECORD	ADVISED OEM				
3728005	11/2/2011	DXPK71-651-00	12460-1	BLOOMER TRAILERS	254.947.8213	DEXTER AXLE	29-Dec	NO RECORD	ADVISED OEM				
3727017	10/19/2011	DXPK71-651-00	12460-1	BLOOMER TRAILERS	254.947.8214	DEXTER AXLE	29-Dec	NO RECORD	ADVISED OEM				
3726016	10/5/2011	DXPK71-651-00	12460-1	BLOOMER TRAILERS	254.947.8215	DEXTER AXLE	29-Dec	NO RECORD	ADVISED OEM				
3726014	10/5/2011	DXPK71-651-00	12460-1	BLOOMER TRAILERS	254.947.8216	DEXTER AXLE	29-Dec	NO RECORD	ADVISED OEM				
3725527	9/28/2011	DXPK71-651-00	12460-1	BLOOMER TRAILERS	254.947.8217	DEXTER AXLE	29-Dec	NO RECORD	ADVISED OEM				
3728557	11/9/2011	DXPK71-651-00	13977-1	CERTIFIED OILFIELD	361.275.6498	RETURNED	29-Dec	NOT RECORDED	ADVISED OEM				
3729360	11/22/2011	DXPK71-651-00	16420-1	FAIRWEST TRAILERS	361.798.4979	RETURNED	29-Dec	14197	REPLACED FROM STOCK				
3728011	11/2/2011	DXPK71-651-00	26689-2	SPILLAR CUSTOM HITCHES	512.244.2224	RETURNED	29-Dec	14057	0412WC0214	REPLACEMENT SENT BY DEXTER			

SOUTHWEST WHEEL
RETURNED 17 UNITS FROM
INVENTORY
NEW

			SERIAL #	DTS11903 TO DTS12759				
INVOICE	DATE		ACCT. NO.	NAME	PHONE		SERIAL #	
3730057	12/2/2011	DXPK71-650-00	19290	INDUSTRAIL BRAKE & CLUTCH	210.661.9658	RETURNED	12247	REPLACED FROM STOCK
3729297	11/21/2011	DXPK71-650-00	14761-1	COWBOY TRAILER REPAIR	254.947.1525	RETURNED	12239	REPLACED FROM STOCK
		DXPK71-650-00	12517	SOUTHWEST GOOSENECK	210.226.0301	RETURNED	NO RECORD	REPLACED FROM STOCK
				(ROADWAY SPECIALITIES) JOSH	512-280-6666	RETURNED	12261	REPLACED FROM STOCK

SOUTHWEST WHEEL
RETURNED 7 UNITS FROM INVENTROY NEW