



**Great Dane**

April 10, 2013

Ms. Jennifer Timian  
Chief, Recall Management Division  
Office of Defects Investigation  
1200 New Jersey, Avenue SE  
Washington, DC 20590

Re: EQ12-011

Dear Ms. Timian:

We have reviewed the above referenced EQ and would like to follow up with you as to Great Dane's position on this matter. Based upon the purchase order information provided to us by MGM Brakes the piston brake chambers supplied to Great Dane were all for one O.E. customer, UPS.

UPS has not reported any field incidents and/or brake lock up issues on Great Dane trailers. We have further reviewed the information provided by MGM and are of the understanding that MGM has taken the position this is not a safety related issue. The MGM internal analysis concluded that these piston style brake chambers will not cause the service brake to unexpectedly apply if the parking brake does not fully release. Further they have determined that the failure mode is not unlike the normal failure mode with the exception that the duration of the chamber service life is reduced due to the defect.

MGM is handling this issue on a fix as fail basis and is working directly with the customer on field replacements under their warranty. Based upon the information that we have we do not view this issue as a safety issue and will not be initiating a field recall on this matter.

We will continue to monitor this situation and will follow up with NHTSA should new information develop on this issue.

Sincerely,

Barry A. Mitchell  
Director, Customer Service/Warranty

/bam