



Stoughton Trailers, LLC

March 1, 2013

Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, D.C. 20590

Re: Safety Recall EQ12-011

This is responsive to NHTSA's letter to Stoughton Trailers, LLC received on February 20, 2013 regarding an equipment query investigation relating to certain MGM Type 24 J-Series piston parking brake chambers. The investigation is assigned the identification EQ12-011. The following information is provided to NHTSA to assist it in completing its investigation.

1. MANUFACTURER'S NAME: Stoughton Trailers, LLC ("Stoughton").
2. IDENTIFICATION OF VEHICLES:
 - All vehicles are commercial semi-trailers sold under the STOUGHTON brand.
 - Vehicle model/model year/manufacturing dates:
 - AVW-535T-S/2012/March, 2011 – October, 2011
 - DVW-285S-C-WDG/2012 & 2013/May, 2011 – August, 2011 & April, 2012 – May, 2012
 - AVW-455T-S/2012/September, 2011 – October, 2011
 - AVW-405T-S/2012/October, 2011
 - AVW-485T-S-C/2013/April, 2012 – May, 2012
 - Other identification necessary to describe vehicles:
 - All vehicles were sold to United Parcel Service ("UPS")
55 Glenlake Parkway NE
Atlanta, GA 30328
3. COMPONENT MANUFACTURER: MGM Brakes ("MGM"), a division of Indian Head Industries, Inc., 8530 Cliff Cameron Drive, Charlotte, NC 28269-5906; phone: (704) 547-7411

4. VEHICLE POPULATION INVOLVED:

Type	Make	Model	No. of Suspect Vehicles (all in US)
Commercial Semi-Trailer	Stoughton®	AVW-535T-S	696
Commercial Semi-Trailer	Stoughton®	DVW-285S-C-WDG	812
Commercial Semi-Trailer	Stoughton®	AVW-455T-S	130
Commercial Semi-Trailer	Stoughton®	AVW-405T-S	61
Commercial Semi-Trailer	Stoughton®	AVW-485T-S-C	264

5. PERCENTAGE OF VEHICLES ESTIMATED TO CONTAIN THE MGM BRAKE CHAMBERS AT ISSUE:

- It is estimated that substantially 100% of the vehicles of the suspect population could have the MGM chambers.

6. DESCRIPTION OF POSSIBLE DEFECT:

- Stoughton is not able to independently verify either the existence of a defect or a lack thereof. Information is derived from what has been reported to Stoughton by NHTSA, by MGM Brakes and by UPS.

7. CHRONOLGY OF EVENTS:

- On or about October 19, 2012 – Stoughton received a letter from MGM brakes informing Stoughton of a potential spring side leak issue with the type 24 MGM J-Series piston parking brake chamber. A copy of that letter is attached.
- On or about November 8, 2012 – a UPS representative reported to Stoughton of a possible issue relating to the MGM spring brake chamber on one trailer.
- On or about November, 2012 – MGM representatives began working directly with UPS to resolve any issues with the MGM spring brake chambers.
- Also in 2012, UPS reported a second trailer with a possible issue relating to the MGM spring brake chamber.
- On or about January 15, 2013 – Stoughton received a letter from MGM brakes relating to the type 24 J-Series piston parking brake accuator. A copy of that letter is attached.
- On February 20, 2013 – Stoughton received from NHTSA a letter relating to safety recall investigation EQ12-011.

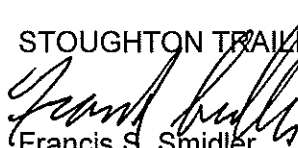
- On or about February 20, 2013 – Stoughton received from MGM a letter stating that the issue with their brake chambers does not present a safety defect. A copy of that letter is attached.
- On February 27, 2013 – Mr. Brian Shrandt of MGM brakes informed Stoughton that the warranty occurrence rate on the brake chamber at issue was about 0.80%.

At this time, Stoughton believes it has inadequate information to determine whether a defect with the MGM Type 24 J-Series piston parking brake chambers exists or not. Accordingly, Stoughton has no present plans to initiate an independent recall of those parking brake chambers.

The undersigned may be contacted for any additional information at (608) 873-2569 or Fsmidler@stoughtontrailers.com.

Sincerely,

STOUGHTON TRAILERS, LLC



Francis S. Smidler
Engineering Manager

FSS:ajj
Encls.