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Date: September 24, 2013

SENT VIA EMAIL

U.S. Department of Transportation
National Highway Traffic Safety Administration
Office of Defects Investigation
Recall Management Division

1200 New Jersey Avenue SE
Washington DC 20590
Attn.: Cynthia Glass

Re.: EQ 13-006

Dear Ms. Glass:

In response to NHTSA's information request for EQ 13-006 the 264 potentially defective locks that Interstate Group, LLC (the "Company") purchased from Fastec Industrial Corporation were used as replacement door locks. The Company is an enclosed cargo trailer manufacturer but it also sells replacement parts in its retail store outlets.

Since January 2006, the Company has not received any reports of any equipment defects or failures in any of its units regarding the alleged defective locks sold by Fastec Industrial Corporation (Fastec). The Company has determined after careful review that the single incidence of alleged lock failure described in Fastec's part 573 does not warrant the Company conducting a recall over this issue because the potential defect is inconsequential as it relates to enclosed cargo trailers and vehicle safety. A person could not possibly get locked in a cargo trailer because any and all individuals would be on the outside of a cargo trailer in the rare event that this potential lock failure were to occur. The only way a person could possibly get locked in a cargo trailer would be based on an intentional act, not potential lock failure.

Fastec's description that if a lock is affected, the key may be able to be removed from the locked door when the key in the deadbolt cylinder is in the horizontal 9 o'clock position, potentially jamming the deadbolt and potentially causing the red lever on the interior side of

the lock to become inoperable, does not pose any safety concern as it relates to enclosed cargo trailers where people are not inside of the vehicle. In any potential event of lock failure, no person would be inside an enclosed cargo trailer because all locking of contents only must be done from the outside. The fact that enclosed cargo trailers are not intended to be lived in as RV's, substantially decreases any potential safety risks posed by the alleged description and potential defects because people, unlike in live in RV's, are never inside of cargo trailers when any malfunction to any such locks may potentially occur. Therefore, any defect or noncompliance is inconsequential as it relates to motor vehicle safety relating to enclosed cargo trailers.

Respectfully,

Interstate Group, LLC

Daniel C. Meyer,
General Counsel