

02/19/14

Karl,

I have worked through the IR response. A couple other questions. When we spoke you said most of the failures occurred on trailer with 18" king pin setting and heavier GVWR. Can you provide production data with that detail? What king pin setting did each trailer have?

I added a column for kingpin setting on the end of the Warranty Data sheet. Looks like about 66% of the trailers repaired had an 18" pin setting.

Looking at your website I see that Cornhusker offers 4 different capacity hoppers (1575, 1585, 1620 and 1800 CU FT) However your response only included 1590 CU FT. Please explain or correct production submission.

We make many lengths and heights of hoppers. Probably some 80 variations. 1,590 cu.ft. is the capacity of our standard tandem trailer. I'm not sure capacity is the correlation we are looking for. I added a capacity column at the end of the Warranty Data sheet. Most of the trailers repaired have a capacity that is less than our standard trailer. The customer specifies capacity based on the weight of the commodity he hauls. For example, if you haul sunflower seeds, you will order a larger capacity trailer than a customer that hauls corn.

Your production data included 17 different GVWR options ranging from 6500 to 675,000 pounds. Please explain each configuration: number of axles, axle weight ratings, king pin setting and weight rating, and capacity of hopper.

Our product line has (3) main GVWR groups.

65,000 lbs. = 2-axle trailers

75,000 lbs. = 3-axle trailers

85,000 lbs. = 4-axle trailers

Kingpin settings vary. An 18" setting is more typical on a 3-axle trailer.

Capacities vary, based on the trailers intended use.

Which trailers were equipped with vibrators? Which trailer have air scales?

I have added a Vibrator column at the end of the Warranty Data sheet. Some of the trailers repaired were equipped with vibrators.

These vibrators are pneumatic vibrators that create low impact/high frequency pulses as opposed to 'Shakers' (usually starter motors with large off-center spinning weights) .

I would never equip an aluminum trailer with a 'Shaker'. I doubt pneumatic vibrators correlate to structural problems.

None of the repaired trailers had air scales.

Also, the FEA p2al-96-r file did not include the report's conclusion. Please send the conclusion.

We are reran the FEA using an 18" pin setting and data reflecting the actual changes made. See attachment.

The 1st. FEA used a 24" pin setting.

NHTSA has recalls from two other trailer manufactures for nearly identical failures (06V-336 and 06V045 files attached) Please review and explain what is different about Cornhusker's situation.

06V-045 from [REDACTED] has no correlation. This product is a pull trailer, not a semi-trailer. It has no kingpin.

The area in question is on the under-carriage below the turntable. More of a frame issue really, not trailer body structure issue.

06V-336 from [REDACTED] . has more of a correlation, but their area in question is behind the kingpin and to the side where the assembly attaches to the trailer bottom rail.

When this fails, the trailer could fall down and contact the driving wheels on the tractor causing serious loss of control.

Our area in question is ahead of the kingpin and centered in the middle of the trailer. Even in cases of extreme neglect and failure, our pin plate bowed up slightly, but showed no signs of the trailer falling down on the tractor driving wheels.