



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

1200 New Jersey Avenue SE.
Washington, DC 20590

AUG 11 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Justin Maples
Tracker Marine, LLC
2500 E. Kearney
Springfield, MO 65898

NVS-214njs
PE14-026

Dear Mr. Maples:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE14-026) to investigate allegations of swing away tongue failures which may contribute to a loss of control or vehicle separation in certain model year (MY) 2011 model trailers manufactured by Tracker Boats (Tracker) and to request certain information.

This office received one (1) Vehicle Owner Questionnaire (VOQ) and reviewed multiple forum discussions reporting swing away hitch failures. The VOQ alleges the trailer became difficult to control. ODI is also aware that Tracker has twice recalled for safety defects of the swing away tongue, 06V438 and 94V205. A copy of the VOQ and recalls are enclosed for your information.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** all MY 2011 Tracker Boat Trailers equipped with a swing away hitch manufactured for sale or lease in the United States.
- **Peer vehicles:** all MY 2010-2014 Tracker Boat Trailers equipped with a swing away hitch manufactured for sale or lease in the United States.
- **Subject component:** any swing away type tongue/hitch installed on the subject vehicles.
- **Tracker Boat Trailers:** Tracker, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Tracker (including all business units and persons previously referred to), who are or, in or after

2009, were involved in any way with any of the following related to the alleged defect in the subject vehicles:

- a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect:** Failure of the swing away tongue/hitch
 - **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Tracker, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Tracker or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms “claim,” “consumer complaint,” “dealer field report,” “field report,” “fire,” “fleet,” “good will,” “make,” “model,” “model year,” “notice,” “property damage,” “property damage claim,” “rollover,” “type,” “warranty,” “warranty adjustment,” and “warranty claim,” whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Tracker has previously provided a document to ODI, Tracker may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Tracker’s response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State, by make, model and model year, the number of subject and peer vehicles Tracker has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Tracker, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. GVWR;
 - f. Facility vehicle was manufactured at;
 - g. Subject component supplier;
 - h. Subject component part number and design version installed as original equipment;
 - i. Date of vehicle manufacture;
 - j. Date of subject component manufacture; and
 - k. Date warranty coverage commenced.

Provide the table in Excel, or a compatible format, entitled “PRODUCTION DATA.” A pre-formatted, Data Collection File which provides further details regarding this submission, will be emailed to you.

2. State the number of each of the following, received by Tracker, or of which Tracker is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:
 - a. Consumer complaints;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury or fatality;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings where Tracker is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Tracker is or was a defendant or codefendant.

For subparts “a” through “f,” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “f,” provide a summary description of the alleged problem and causal and contributing factors and Tracker’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “d” and “f,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. Tracker’s file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner’s name, mailing address, email address, and telephone number;
 - d. Vehicle’s VIN;
 - e. Vehicle’s make, model, model year, and GVWR;
 - f. Tracker manufacturing facility which produced the subject vehicle;
 - g. Vehicle’s mileage at time of incident;
 - h. Vehicle’s Time in Service at time of incident;
 - i. Incident date;
 - j. Report or claim date;
 - k. Whether a crash is alleged;
 - l. Whether property damage is alleged;
 - m. Number of alleged injuries, if any; and
 - n. Number of alleged fatalities, if any.

Provide this information in Excel, or a compatible format, entitled “REQUEST NUMBER TWO DATA.” A pre-formatted Data Collection File, which provides further details regarding this submission, will be emailed to you.

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Tracker used for organizing the documents.
5. State, by make, model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Tracker to date that relate to, or may relate to, the alleged defect in the subject and peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Tracker's claim number;
- b. Vehicle owner's name, mailing address, email address, and telephone number;
- c. VIN;
- d. Vehicle's make, model, model year, and GVWR;
- e. Tracker manufacturing facility which produced the subject vehicle;
- f. Repair date;
- g. Vehicle mileage at time of repair;
- h. Vehicle's Time in Service at time of repair;
- i. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- j. Labor operation number;
- k. Problem code;
- l. Replacement part number(s) and description(s);
- m. Concern stated by customer; and
- n. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Excel, or a compatible format, entitled "WARRANTY DATA." A pre-formatted, Data Collection File which provides further details regarding this submission, will be emailed to you.

6. Describe in detail the search criteria used by Tracker to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Tracker on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Tracker offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.
7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Tracker has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or

communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Tracker is planning to issue within the next 120 days.

8. State Tracker's warranty terms offered to owners of the subject vehicles. If the supplier of the subject component offers a warranty, state those terms as well.
9. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Tracker. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

10. Provide a copy of all documents provided to Tracker from the subject component supplier(s) for the purpose of installation of the subject component in the subject and peer vehicles. These documents should include, but not be limited to; design limitations, assembly and maintenance requirements of the subject component.
11. Provide a copy of all work instructions related to the subject component used by Tracker employees for the purpose subject and peer vehicle production. If instructions differ between manufacturing locations, clearly indicate which instructions are used by each facility.
12. Describe all modifications or changes made by, or on behalf of, Tracker or at the discretion of the subject component supplier in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
 - a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. The date or approximate date on which the modification or change was incorporated into subject component production;
 - c. A detailed description of the modification or change;
 - d. The reason(s) for the modification or change;
 - e. The part number(s) (service and engineering) of the original component;
 - f. The part number(s) (service and engineering) of the modified component;

- g. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- h. When the modified component was made available as a service component; and
- i. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Tracker is aware of which may be incorporated into vehicle production within the next 120 days.

13. Please state the date and model year vehicle when the subject component was first offered by Tracker?
14. If the subject component is available as a service replacement, provide a count of parts sales by month. If the individual components of the subject component can be purchased separately, provide a count of parts sales by month for each item. Separate parts sales by supply and revision if applicable.
15. Furnish Tracker's assessment of the alleged defect in the subject vehicle, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses;
 - e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning;
 - f. The VOQ report included with this inquiry; and
 - g. Its difference from recalls 06V438 and 94V205.

Legal Authority for This Request

This letter is being sent to Tracker 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 and to request reports and the production of things. It constitutes a new request for information.

Civil Penalties

Tracker's failure to respond promptly and fully to this letter could subject Tracker 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. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, as amended, 49 U.S.C. § 30165(b), provides for civil penalties of up to \$7,000 per day, with a maximum of \$17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 77 Fed. Reg. 70710 (November 27, 2012)). This includes failing to respond completely to ODI information requests.

If Tracker cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Tracker does not submit one or more requested documents or items of information in response to this information request, Tracker must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

All business confidential information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office. In addition, do not submit any business confidential information in the body of the letter submitted to this office. Please refer to PE14-026 in Tracker's response to this letter and in any confidentiality request submitted to the Office of Chief Counsel.

If Tracker 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, Tracker 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, 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. Tracker 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 phrase "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONTAINS CONFIDENTIAL BUSINESS INFORMATION" (as appropriate) must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 49 CFR 512.6. If you submit a request for confidentiality for all or part of your response to this IR, that is in an electronic format (e.g., CD-ROM), your request and associated submission must conform to the new requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats. See 49 CFR 512.6(c) (as amended by 72 Fed. Reg. 59434 (October 19, 2007)).

If you have any questions regarding submission of a request for confidential treatment, contact Otto Matheke, Senior Attorney, Office of Chief Counsel at otto.matheke@dot.gov or (202) 366-5253.

Due Date

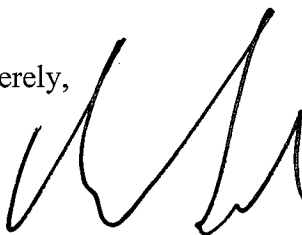
Tracker's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by September 19, 2014. If Tracker finds that it is unable to provide all of the information requested within the time allotted, Tracker must request an

extension from me at (202) 366-6938 no later than five business days before the response due date. If Tracker is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Tracker then has available, even if an extension has been granted.

Please send email notification to Nate Seymour at nate.seymour@dot.gov and to ODI_IRresponse@dot.gov when Tracker sends its response to this office and indicate whether there is confidential information as part of Tracker's response.

Please call Nate Seymour of my staff at (202) 366-2069, to discuss this information request or if you have any technical questions concerning this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'B. York', written in a cursive style.

Bruce B. York, Chief
Medium/Heavy Duty Vehicle Division
Office of Defects Investigation

 U.S. Department of Transportation National Highway Traffic Safety Administration		DOT Auto Safety Hotline Vehicle Owner's Questionnaire To Report Vehicle Safety Defects 1-888-DASH-2-DOT (1-888-327-4236) INTERNET: www.nhtsa.dot.gov/hotline		FOR AGENCY USE ONLY 100148	
		Date Received 22-JUL-2014	Repository ☐ Reference No. 10615428		
OWNER INFORMATION (Type or Print)					
Name		Daytime Telephone Number		E-mail Address	
Address					
City	State	Zip Code	Evening Telephone Number		
<i>The information you provide will be used to identify potential safety-related defects. We may share your information with the applicable vehicle manufacturer during an investigation or recall in accordance with the routine uses described in the agency's Privacy Act notice. See 49 FR 53971 (Sep. 3, 2004).</i>					
VEHICLE INFORMATION					
17 digit Vehicle Identification Number Located at bottom of windshield on driver's side		Make	Model	Model Year	
		TBD	TBD	9999	
Date Purchased	Dealer's Name and Telephone Number		Engine:	Fuel Type:	
Original Owner	Dealer's City	State	No: Cylinders		
Transmission Type	☐ Antilock Brakes	Powertrain	Multiple Failure:	Incident Date(s)	
	☐ Cruise Control			07-JUL-2014	
FAILED COMPONENT(S)/PART(S) INFORMATION					
Vehicle Component Code: 980000 UNKNOWN OR OTHER			Failure Mileage	Failure Speed	
			4000	65	
ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE					
Tire Make	Tire Model (Name or Number)		Tire Size (Example P215/65R15)		
DOT No. (Example: DOTM9ABC036)	☐ Original Equipment	Failure Location:			
	☐ Prior Repair				
Tire Component Code			Tire Failure Type:		
ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE					
Make:	Date Manufactured:		Model No./Name:		
Seat Type:	Installation System:				
Child Seat Component Code:		Failed Part:			
APPLICABLE INCIDENT INFORMATION					
<i>(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies).)</i>					
Crash	Fire	Number of Persons Injured	Number of Deaths	Reported to Police	
☐ Yes ☒ No	☐ Yes ☒ No	0	0	N	
Narrative Description of Incident(s), Crash(es), and Injury(ies). Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e., parts repaired or replaced (and if old part is available).					
ON JULY 7, 2014, WE LEFT TO GO CAMPING TOWING OUR BOAT BEHIND THE RV. WE WERE TRAVELING DOWN I-40 AND ABOUT 100 MILES FROM HOME WHEN WE NOTICED THE BOAT TRAILER WAS SWAYING. WE EXITED THE HIGHWAY AND DID A WALK AROUND THE TRAILER TO CHECK THE TIRES AND HITCH BUT DID NOT FIND ANYTHING WRONG AND CONTINUED TO CONCHAS LAKE STATE PARK, AN ADDITIONAL 90 MILES OR SO. WHEN I WENT TO UNHOOK THE BOAT I COULD NOT. TRACKER TRAILSTAR FEATURES A SWING AWAY TRAILER TONGUE THAT WAS LESS THAN 8" OFF THE GROUND. THE BOLT (ON THE PASSENGER SIDE) WHICH HAS A GREASE HOLE DOWN THE MIDDLE BROKE WITH ONLY A THIRD OF THE BOLT LEFT. THE WELD THAT HOLDS THE LOCKING PIN ON THE OTHER SIDE OF THE TONGUE WAS ALMOST GONE AND I WAS AN INCH OF WELD AWAY FROM LOSING THE BOAT TRAILER. I USED TO WORK IN THE FOUNDRY AT MERCURY MARINE AND AFTER LOOKING AT THE BOLT, IT IS MY BELIEF THAT THE FOUNDRY MAY HAVE HARDENED THE BOLT TOO HARD. NEVERTHELESS THE BOT DID BREAK AND IF I WAS TRAVELING ANY FURTHER DOWN THE HIGHWAY I BELIEVE THE TONGUE WOULD HAVE DISENGAGED FROM THE BODY OF THE TRAILER AND POSSIBLY CAUSED AN ACCIDENT. I HAVE LESS THAN 5,000 MILES ON THIS TRAILER.					
## VIN FAILED ## TRACKER TRAILSTAR 2011 WITH SWINGAWAY TONGUE ##					
Include, if available: Police/Fire Department Report, Photos, and Repair Invoice.			ATTACH ADDITIONAL SHEETS IF NECESSARY		
The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a Manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.					

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report¹

On November 1, 2006 Tracker Marine, LLC decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: November 2, 2006

Furnish the manufacturer's identification code for this recall (if applicable): TS-0015

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Tracker Marine, LLC
2500 E. Kearney
Springfield, MO 65803

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Sharon Hutchens
Advocacy Response Supervisor

Telephone Number: 417-873-4528 Fax No.: 417-873-5036

Name and Title of Person who prepared this report.

Sharon Hutchens
Advocacy Response Supervisor

Signed:



¹Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5227 or by FAX at (202) 366-7882.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): Trailstar Model Years Involved: 2007 Model(s):
Q8, 202, 215, 222, 228

Production Dates: Beginning: July 12, 2006 Ending: October 31, 2006

VIN Range: Beginning [REDACTED] Ending: [REDACTED]

Vehicle Type: Trailer Bodystyle: Boat

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

The 2007 Model Year Q8, 202, 215, 222, 228 model Trailstar trailers have been identified by build date. Units built before July 12, 2006 used a different supplier part. The affected models use part numbers 129101, 129102, 129103, 129104, 129105, and 129106 supplied by Pivit-Hitch for the Swing-Away Tongue. We are also notifying aftermarket part purchasers of part numbers 133760 and 133761.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

95 %

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Vehicles	Number of
Model	Potentially
Involved	
<u>TRL, Q8TA</u>	<u>2007</u>

<u>TRL, TAH215TA</u>	<u>2007</u>	
<u>147</u>		
<u>TRL, TAH222TA</u>	<u>2007</u>	
<u>30</u>		
<u>TRL, TAH228TA</u>	<u>2007</u>	
<u>24</u>		
<u>TRL, TN202TA</u>	<u>2007</u>	
<u>11</u>		
<u>Aftermarket parts</u>	<u>Unknown</u>	<u>6</u>

Total Number Potentially Affected by the Recall: 259

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 95 %

Identify and describe how the recall population was determined—in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

The 2007 Model Year Q8, 202, 215, 222, 228 model Trailstar trailers have been identified by build date. Units built before July 12, 2006 used a different supplier part. The affected models use part numbers 129101, 129102, 129103, 129104, 129105, and 129106 supplied by Pivit-Hitch for the Swing-Away Tongue. A different Swing-Away Tongue assembly was used on these models prior to July 12, 2006. Some models won't have the Swing-Away tongue.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The Swing-Away Tongue on the 2007 Model Year Q8, 202, 215, 222, 228 model Trailstar trailers use components made by Pivit Hitch. The casting of the Pivit Hitch may weaken and break.



Describe the cause(s) of the defect or noncompliance condition.

The Swing-Away Tongue on the 2007 Model Year Q8, 202, 215, 222, 228 model Trailstar trailers use components made by Pivit Hitch. The casting of the Pivit Hitch may weaken and break.

Describe the consequence(s) of the defect or noncompliance condition.

If the casting of the Pivit Hitch breaks as shown in the attached photo, the trailer will disconnect from the tow vehicle. The then free-coasting trailer may do significant property damage and may cause serious injury or death.

Identify any warning which can (a) precede or (b) occur.

A consumer may notice a stress crack at this joint prior to a complete break occurring.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Pivit Hitch
5490 Via Ricardo
Riverside CA 92509

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Eddie Rowland, President 951-682-5522

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

It was reported that a trailer under a Q8 model boat had an accident on the highway near Atlanta GA on or about October 30, 2006. The trailer was brought back to our factory for investigation. Further investigation is ongoing.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

Attached Recall Notification

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

Attached Recall Notification

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

Production changes were made on the line on October 31, 2006. Tie-Down Corporation's Pivot design will be used in place of that supplied by Pivit-Hitch.

VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

- Dealers notified to cease delivery of affected models to end use consumers on November 1, 2006 via web-based dealer site. Copy of notification emailed to Patricia Wallace.
- Copies of dealer letter, consumer letter and instruction supplied to NHTSA for approval November 2, 2006. Decision was made to replace all equipment in dealer and /or consumer possession.
- Notification of dealers to occur via TracNet (web-based Dealer Interface) and mail immediately following approval by NHTSA. Notification to affected consumers to follow dealer notification first by phone call and then by certified letter.

VII. Furnish Recall Communications

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications

(including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

PRODUCT ALERT

Tracker Marine Group_{sm}, the manufacturer of Trailstar® Trailers has been notified that there has been a failure of the Swing-away Pivot Hitch on a trailer built for the 2007 Model Year Tahoe Q8, 202, 215, 222, and 228 models.

Our investigation into this matter is not complete. We have notified the boat plants involved not to ship any further orders. In addition, due to our concern for public safety, at this time we are requesting that dealers delay delivery of these trailers to consumers pending final determination.

If you have sold one of these models, you may call email the serial number to Shutchens@trackermarine.com to be placed on the priority list for correction to the trailer.

We will advise further details once our internal investigation is complete and we do sincerely apologize for the inconvenience.

Thank you,

Public
✓

DEC 8 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gene Brotherton
Customer Service Manager
Tracker Marine
1915-C South Campbell
Springfield, MO 65807

NEF-111bdh
94V-205

Dear Mr. Brotherton:

This acknowledges receipt of your Defect Information Report involving trailer hitch assemblies on certain Tracker Marine (Tracker) boat trailers submitted in accordance with 49 CFR Part 573, "Defect and Noncompliance Reports."

Future reports should be addressed to the Associate Administrator for Enforcement, National Highway Traffic Safety Administration, 400 Seventh Street, SW, Washington, DC 20590, as required by 49 CFR Part 573.9.

RECALL CAMPAIGN INFORMATION

NHTSA Recall Campaign ID Number: 94V-205

(Please refer to this number in all future correspondence.)

NHTSA Contact: Jonathan D. White, Chief
Technical Analysis Branch

Telephone: (202) 366-5227
Fax: (202) 366-7882

Date of Letter: October 19, 1994

Number of Vehicles Recalled: 68 Tracker Marine 1995 Nitro 190 (single and tandem axle) and Nitro 2000 (tandem axle) boat trailers manufactured from May 23 through September 2, 1994.

Defect: These trailers are equipped with a "swing-away" tongue that folds into a 90 degree angle when in storage. The holes used for the fasteners are larger than needed, causing a loaded trailer to weave back and forth unsafely. The trailer swaying can cause an operator to lose control resulting in an accident.

Tracker Marine is responsible for the remedy of these vehicles from this date forward, regardless of vehicle age, mileage, or ownership. You should know that the agency provides a listing of safety recalls to the media at the end of each month. This recall will be a part of that listing.

ADDITIONAL INFORMATION REQUIRED

In order for us to complete our file on this matter, please provide the following additional information:

1. Identify and describe how the recalled vehicle population was determined, including but not limited to, how the inclusive dates of manufacture were established.
2. Identify the source for the owner names and addresses used in this recall campaign and identify how recent these names and addresses are.
3. Identify and describe the "... addition of 8 steel bushings with a tighter inside diameter tolerance ..." as part of the production remedy. Identify the location of these bushings on the trailer hitch and describe why the recall remedy does not include these bushings.

Please provide this information, referencing the National Highway Traffic Safety Administration's identification codes on page 1 of this letter, to this office by **January 5, 1995.**

NOTIFICATION TO PURCHASERS

We have reviewed your proposed owner notification letter and it does not meet all the requirements of Part 577. The statement that there have been **no accidents or injuries reported** cannot be used. This statement implies that the defect **may not exist** on any of the vehicles and is considered to be a disclaimer specifically prohibited by Part 577.8(a).

This requirement needs to be added to any additional owner notification letters on this or any future safety recall campaigns. A second notification letter on this recall, in full compliance with Part 577, may be required depending on the performance of this recall.

QUARTERLY STATUS REPORTS

Quarterly reports are due for the first 6 consecutive quarters once owner notification has begun. In the case where the recall appears to be completed, quarterly reporting is required until your company is notified otherwise by this office. The first quarterly status

report for this campaign, as required in Part 573.6, is required to be submitted within 25 working days after the close of the calendar quarter **in which notification to purchasers begins**. For instance, the current calendar quarter ends on December 31, 1994, and the first quarterly report for recalls where owner notification begins in this quarter is due by February 7, 1995.

Also, in every quarterly report, we request that Tracker Marine identify, separately, the number of vehicles which were returned or otherwise remedied prior to sale to owners.

Sincerely,

/s/

Louis J. Brown, Jr., Acting Director
Office of Defects Investigation
Enforcement



1915-C South Campbell, Springfield, MO 65807
(417) 882-4444, FAX No. (417) 882-0807

RECEIVED
94 OCT 21 AM 10:30
OFFICE
DEFECTS INVESTIGATION

October 19, 1994

94V-205 (C1)

Mr. Jon White
National Highway Traffic Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590

Dear Mr. White,

Attached is information on a recall involving a small number of 1995 swing-away tongue trailers produced by Tracker Marine, L.P. This information was faxed to you on Wednesday morning, October 19, 1994.

Please contact me with any questions or comments.

Sincerely,

Gene Brotherton
Customer Service Manager

BASS TRACKER



2

VIN SEQUENCE / MODEL DETAIL SHEET

1995 NITRO 190 TANDEM AXLE



94V-205 (85)

TOTAL 2

SERIAL #

1995 NITRO 190 SINGLE AXLE

TOTAL

[illegible]

TOTAL	23
-------	----

Defect and Noncompliance Report Guide for Vehicle Manufacturers
PART 573 Defect and Noncompliance Report

Date this report was prepared: 10/17/94

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and address of the designated U.S. agent as prescribed by section 110(e) of the National Traffic and Motor Vehicle Safety Act.

TRACKER MARINE - L.P., OZARK PLANT

2. Description of recalled vehicles is addressed on last page.
3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Model	Year	Number of Vehicles Potentially Involved
Nitro 190 (Single Axle) Boat Trailer - 1995		23
Nitro 190 (Tandem Axle) Boat Trailer - 1995		2
Nitro 2000 (Tandem Axle) Boat Trailer - 1995		43

LOCATION OF TRAILERS:

28 in possession of retail customers.

37 in possession of 16 dealers.

3 in Tracker Marine's possession.

Total Number of Vehicles: 68

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance.

49%

This is a para-phrased guide developed from 49 CFR Part 573, "Defect and Noncompliance Reports." Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5227.

2. Identify the Vehicles Involved in Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make: TRACKER NITRO 190 (Single Axle) BOAT TRAILER
Model: T95N190P, T95N190G
Model Years Involved: 1995
Production Dates: Beginning: 5/23/94 Ending: 9/02/94
VIN Range: Beginning: See attached Ending:
Vehicle Type: BOAT TRAILER Bodystyle:
Other descriptive information which characterizes/distinguishes the vehicles to be recalled:

Make: TRACKER NITRO 190 (Tandem Axle) BOAT TRAILER
Model: T95N190TAPB, T95N190TAGB
Model Years Involved: 1995
Production Dates: Beginning: 5/23/94 Ending: 9/02/94
VIN Range: Beginning: See attached Ending:
Vehicle Type: BOAT TRAILER Bodystyle:
Other descriptive information which characterizes/distinguishes the vehicles to be recalled:

Make: TRACKER NITRO 2000 (Tandem Axle) BOAT TRAILER
Model: T95N2000TAPS, T95N2000TAGB
Model Years Involved: 1995
Production Dates: Beginning: 5/23/94 Ending: 9/02/94
VIN Range: Beginning: See attached Ending:
Vehicle Type: BOAT TRAILER Bodystyle:
Other descriptive information which characterizes/distinguishes the vehicles to be recalled:

Make:
Model:
Model Years Involved:
Production Dates: Beginning: Ending:
VIN Range: Beginning: Ending:
Vehicle Type: Bodystyle:
Other descriptive information which characterizes/distinguishes the vehicles to be recalled:

6. The determination of defect was made by our internal quality testing at the following plant location:

Tracker Marine - Ozark, Missouri

No accidents, no injuries, no fatalities, and no warranty claims have occurred.

8. Furnish a description of the manufacturer's program for remedying the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy. Identify any foreseeable problems with implementing the recall.

Enlarge holes for pivot bolt and hitch pin to accomodate a steel bushing,
welded in place, with an acceptable inside diameter tolerance that does not
allow the "swing-away" tongue assembly to move laterally during towing.

Changes to current production include increasing spacing between pivot bolt
and hitch pin from 2.00" to 4.00" O.C. as well as addition of 8 steel bushings
with a tighter inside diameter tolerance.

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers.

Customer and Dealers notified by telephone by 10/17/94

Dealers notified by registered mail on 10/19/94

Customer notified by registered mail on 10/19/94

Furnish the manufacturer's identification code for this recall (if applicable):

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. A draft copy of the notification documents may be submitted to this office by telefax (FAX: 202-366-7882) for review prior to mailing.

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

GENE BROTHERTON

CUSTOMER SERVICE MANAGER

Telephone Number: 417-886-7512

Name and Title of Person who prepared this report.

Gene Brotherton

Signed: Gene Brotherton

1995 NITRO 2000 TANDEM AXLE



TOTAL 43

5. Describe the defect or noncompliance. The description should include but not be limited to a brief summary of the cause, nature, physical location, and consequence of the defect or noncompliance. Illustrations should be provided as appropriate.

These trailers are equipped with a "swing-away" tongue that folds into a 90° angle when in storage. The front half of the assembly that connects to the vehicle pivots on a 5/8" X 5 1/2" bolt and is locked in a straight in-line position with a 5/8" X 6.0" hitch pin for towing. The holes that accomodate these fasteners may exceed a safe tolerance on diameter, which may cause the loaded trailer to weave back and forth unsafely at higher speeds during towing.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address. Identify the name and title of the chief executive officer or knowledgeable representative.

N/A

If the recall is for a Defect, complete item 6; for a Noncompliance, item 7.

6. Furnish a chronological summary of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

(SEE ATTACHED)

7. Furnish the test results or other data on which the manufacturer determined the existence of the noncompliance.

N/A

TRACKER

marine

1915-C South Campbell, Springfield, MO 65807
(417) 882-4444, FAX No. (417) 882-0807

94V-205 (10)

October 18, 1994

Dear Nitro Dealer,

Tracker Marine has independently discovered that the "swing-away" tongue on selected 1995 Nitro 190 and 2000 trailers may have been manufactured with an excessive amount of tolerance in the swing-away tongue mechanism. The holes that accommodate the pivot bolt may exceed a safe tolerance in diameter, which may cause the loaded trailer to weave back and forth unsafely at higher speeds.

Although no accidents or injuries have been reported, to ensure the safety of our customers we have elected to inspect, and if necessary, repair the affected trailers. Enclosed are directions for inspecting the amount of movement in the swing-away tongue mechanism. If you find a trailer that exceeds these measurements, immediately contact Mark Wilson at 417-886-7512. We will make arrangements to have someone visit your location and make the necessary repairs to the trailer.

Immediately suspend sales of the trailers identified by the serial number listing enclosed with this letter. **DO NOT SELL OR DELIVER ONE OF THESE TRAILERS UNTIL IT HAS BEEN INSPECTED, AND OR, REPAIRED.** In addition, contact the trailer owners who have purchased an affected trailer and schedule a time to inspect their trailer.

The following instructions and information are enclosed to assist you in this effort:

- * Serial number listing of your current inventory and registered owners who have purchased trailers from you per Tracker Marine records
- * Inspection instructions and reimbursement claim form for each trailer
- * Letter sent to registered owners

If you have any questions relating to the above information, contact our Customer Service Department at 417-886-7512.

Gene Brotherton

Gene Brotherton
Customer Service Manager

BASS TRACKER



10/18/94 11:26:04

TRAILERS FOR SWING-AWAY TONGUE INSPECTION

FKSERT953R

TRACKER MARINE
1915-C S. CAMPBELL
SPRINGFIELD, MO

Dealer Number: 1
Phone Number: 417 882-4444
FAX Number: 417 882-0807

65807

Serial Number

Retail Customer

Address 1

Address 2

Zip

TEA/SIL SA BRAKE TONY DEAN
WHT/RED SA BRAKE
WHT/RED SA BRAKE BILL WILLIAMS
BLK/RED TA BRAKE RONALD N WEISS
WHT/RED TA BRAKE
RED/SAN TA BRAKE
BLU/SIL TA BRAKE

1013 N GRAND
BOX 1431
9727 POLISHED STONE

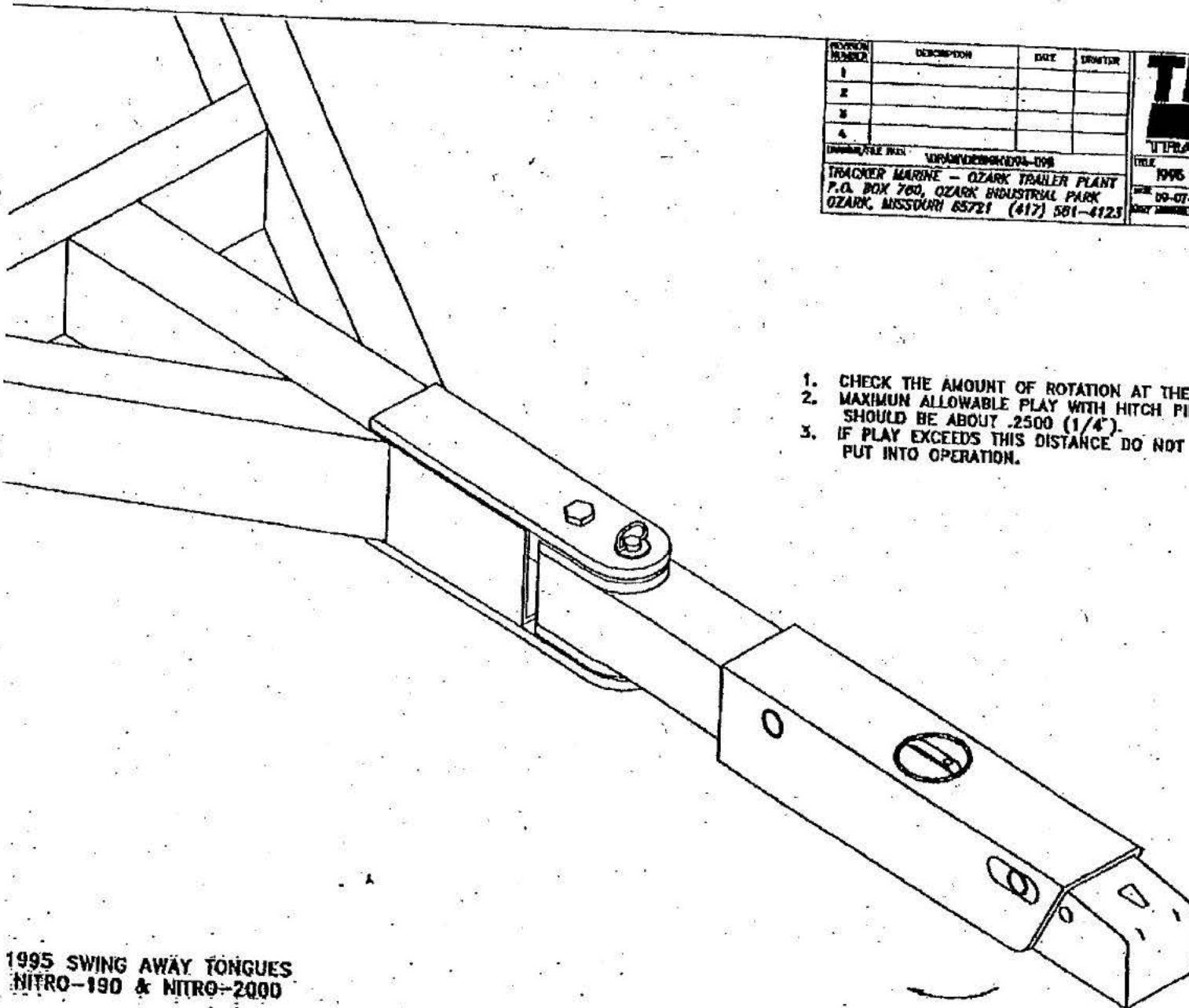
PIERRE SD
FORSYTH MO
COLUMBIA MD

57501
65653
21046

TRL N2000

Number of trailers to be inspected: 7

941-205 (11)



REVISION NUMBER	DESCRIPTION	DATE	DRAWN
1			
2			
3			
4			

TRACKER MARINE - OZARK TRAILER PLANT
 P.O. BOX 700, OZARK INDUSTRIAL PARK
 OZARK, MISSOURI 65721 (417) 581-4125

TRACKER
MARINE
 TRAILSTAR TRAILERS

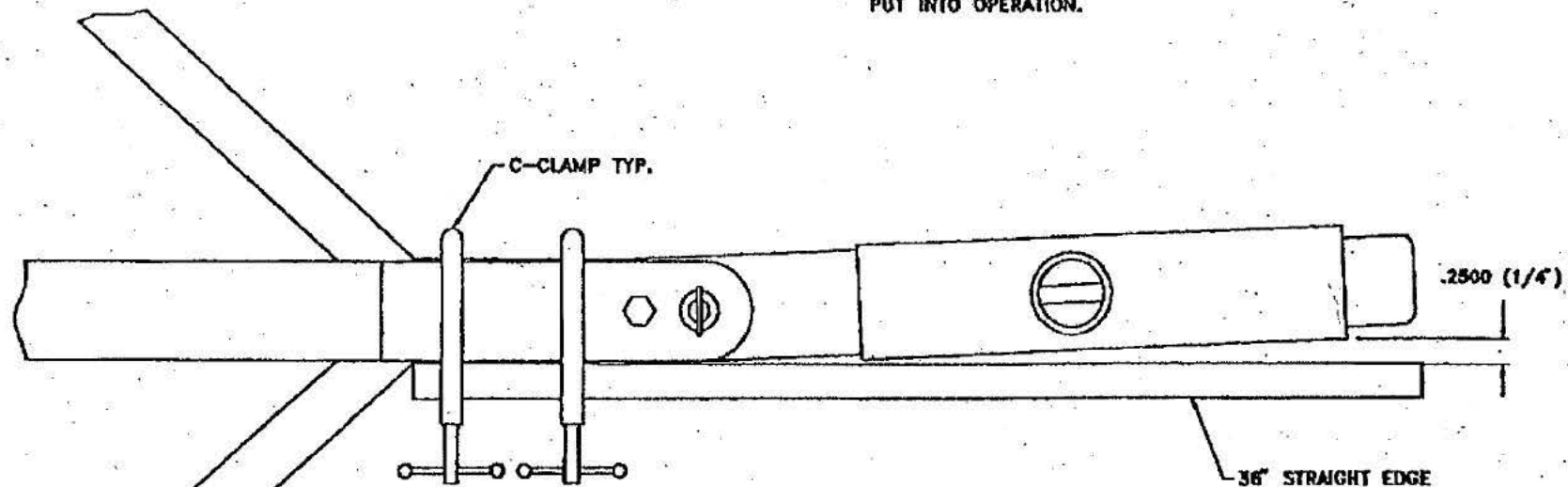
1995 SWING AWAY TONGUE
 DATE 09-07-94
 DRAWN DCR
 CHECKED N/A
 DESIGNED D94-098

1. CHECK THE AMOUNT OF ROTATION AT THE END OF THE ACTUATOR.
2. MAXIMUM ALLOWABLE PLAY WITH HITCH PIN LOCKED IN PLACE SHOULD BE ABOUT .2500 (1/4").
3. IF PLAY EXCEEDS THIS DISTANCE DO NOT ALLOW TRAILER TO BE PUT INTO OPERATION.

1995 SWING AWAY TONGUES
 NITRO-190 & NITRO-2000

- ATTENTION -

1. REMOVE WINCHSTAND ASSEMBLY
2. PLACE 36" STRAIGHT EDGE AGAINST REAR PORTION OF TONGUE, AND SECURE WITH C-CLAMPS.
3. MEASURE THE DISTANCE AT THE END OF THE TONGUE IN RELATIONSHIP TO THE STRAIGHT EDGE.
4. MAXIMUM ALLOWABLE PLAY LEFT TO RIGHT WITH THE HITCH PIN LOCKED IN PLACE, SHOULD BE NO GREATER THAN .2500 (1/4").
5. IF PLAY EXCEEDS THIS DISTANCE DO NOT ALLOW TRAILER TO BE PUT INTO OPERATION.



1995 SWING AWAY TONGUES
NITRO-190 & NITRO-2000



1915-C South Campbell, Springfield, MO 65807
(417) 882-4444, FAX No. (417) 882-0807

94V-205 (24)

WARRANTY CLAIM FORM FOR SWING AWAY TONGUE INSPECTION

TRACKER MARINE
1915-C S. CAMPBELL
SPRINGFIELD, MO

DLR NO.

1

HOURLY RATE: 25.00

65807

Please follow these directions to file a warranty claim for the inspection of the swing away tongue mechanism on selected 1995 NITRO trailers.

1. Immediately inspect the trailer noted on the serial number below.
2. Please indicate in the provided section below if the trailer passed or failed the inspection per instruction sheet.
3. You will be reimbursed .2 hours at your retail labor rate.
4. Sign this form and return it to Tracker Marine headquarters.
5. DO NOT COMPLETE A NORMAL WARRANTY CLAIM. IF YOU ARE AN ON-LINE DEALER, DO NOT ENTER A CLAIM FOR THIS WORK.
6. If you have any questions, please contact our Customer Service Department at (417) 886-7512.

CLAIM NUMBER	SERIAL NUMBER	LABOR OPERATION	FAILURE CODE	HOURS	AMOUNT
505904		469	047	.2	5.00

SWING AWAY TONGUE IS WITHIN MAXIMUM ALLOWABLE TOLERANCE PER INSTRUCTIONS?
YES _____ NO _____ IF NO, CONTACT MARK WILSON AT 417-886-7512 IMMEDIATELY

SIGNED: _____ DATE COMPLETED _____

BASS TRACKER.



TRACKER

marine®

1915-C South Campbell, Springfield, MO 65807
(417) 882-4444, FAX No. (417) 882-0807

October 19, 1994

Dear Nitro Owner,

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. Tracker Marine has determined that a defect which relates to motor vehicle safety exists in some 1995 Nitro boat trailers.

Tracker Marine has discovered during quality control inspections that the swing-away tongue mechanism on selected 1995 Nitro 190 and 2000 trailers may have been manufactured with an excessive amount of tolerance in the swing-away tongue mechanism. This condition may cause the loaded trailer to weave back and forth unsafely at higher speeds.

Although no accidents or injuries have been reported, to ensure the safety of our customers we have elected to inspect, and if necessary, repair the affected trailers.

Our records indicate that you have purchased one of the trailers that may be affected. Immediately contact your selling dealer or the nearest Tracker dealer for an appointment to have your trailer inspected. Your dealer will inspect, and if necessary, repair your trailer at no charge to you. We recommend that you not exceed 45 mph with your trailer when taking it to your dealer for inspection.

Please also be advised that if you have a complaint that Tracker Marine has failed or is unable to remedy this defect without charge within a reasonable amount of time, you may contact the Administrator, National Highway Traffic Safety Administration, 400 Seventh Avenue, S. W., Washington, D.C. 20590 or call, toll free, the Auto Safety Hotline at (800) 424-9393 (Washington, D.C. residents may call (202) 366-0123).

We apologize for any inconvenience this may cause

Sincerely,



Gene Brotherton
Customer Service Manager

BASS+TRACKER



NITRO

TRACKER[®]

marine[®]

1915-C South Campbell, Springfield, MO 65807
(417) 882-4444, FAX No. (417) 882-0807

RECEIVED

55 JAN 24 PM 2:55

OFFICE
DEFECTS INVESTIGATION

January 10, 1995

Louis J. Brown Jr. Acting Director
Office of Defects Investigation Enforcement
National Highway Traffic Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590

Dear Mr. Brown,

This is in response to your request for additional information on recall 94V-205.

Question #1:

Identify and describe how the recalled vehicle population was determined, including but not limited to, how the inclusive dates of manufacture were established.

Response:

The "starting date" (5-23-94) was determined by the start of our 1995 model year production runs. (We have not had this feature until 1995 models).

The "ending date" was determined by the day we determined the problem existed and that action was needed. The next production date (9-23-94) corrective action was made to eliminate this problem on future production.

All model trailers with this swing-away feature from 5-23-94 through 9-22-94 were subject to "recall."
Determined from above information.

5/23/94 to 9/02/94	N-190 Single	1000 thru 1051	= 52
6/24/94 to 9/21/94	N-190 Tandem	1000 thru 1005	= 6
5/23/94 to 9/1994	N-2000	1000 thru 1080	= 81

total= 149

However, there were a total of 65 that were in the hands of retail customers and dealers. The remainder were inspected and corrected.

BASS TRACKER



NTRD

Question #2:

Identify the source for the owner names and addresses used in this recall campaign and identify how recent these names and addresses are.

Response:

Retail owner's names and addresses are captured in our retail registration database and our mainframe. The retail registration cards are filed by the selling dealership and are keyed on a daily basis.

Question #3:

Identify and describe the "...addition of 8 steel bushings with a tighter inside diameter tolerance..." As part of the production remedy. Identify the location of these bushings on the trailer hitch and describe why the recall remedy does not include these bushings.

Response:

The "Recall Remedy" also incorporated the use of 8 steel bushings. The trailer tongue is inspected and measured for defect. If defect is present, the remedy is to insert the steel bushings. (Same as "Production Remedy.")

Drawing attached; showing placement of bushings in the tongue area.

If you have any questions or concerns please contact my office at 417 886-7512.

Sincerely,



Gene Brotherton
Customer Service Manager