# SEAGRAVE FIRE APPARATUS, LLC

January 23, 2014

National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Attention: Ms. Cynthia Glass, General Engineer, RMD

RE: Safety Recall EQ 14-002, 13E-050

Dear Ms. Glass:

In response to the information request for EQ 14-002, the four (4) defective units that Seagrave Fire Apparatus ("Seagrave") purchased from Sure Power Inc. were sold to Blackwater USA, Moyock, North Carolina, on September 17, 2007. Seagrave did not use the defective units or manufacture vehicles with the defective units. Therefore, Seagrave is not conducting a recall on this issue.

Because Seagrave is not a motor vehicle manufacturer of vehicles on which the defective units were installed, the provisions in 49 C.F.R. section 573.3(f) do not apply and Seagrave is not required to comply with either section 573.6 or 573.7. Our position has been confirmed in your e-mail to Deborah Selwitschka dated January 23, 2014.

In the interest of helping NHTSA identify the potential vehicle manufacturer that would be covered by 49 C.F.R. section 573.3(f), we note that when the defective units were sold to Blackwater USA, that company was a Security Service Provider business trying to diversify into the military vehicle manufacturing business. We do not know whether Blackwater USA ever diversified into the vehicle manufacturing business as intended. As we understand, the Blackwater USA company name was changed to Xe Services in 2009 and then to Academi in 2011.

Sincerely,

A.J. Neiner
Chairman & CEO

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