Jan 10, 2022

Josh Neff, Chief
Medium & Heavy-Duty Vehicle Defect Division
Office of Defects Investigation

ref: NEF-106ns
DP21-004

On December 10, 2021 we (Great Dane LLC) received DP21-004, a request for information regarding side underride guards, their availability, and our assessment thereof. The attached information is in response to the inquiry:

To clarify our responses, we have relied upon this additional Definition:

Side Underride Guards: An assembly or device, incorporated into the subject vehicles that is intended to mitigate the results of automotive crashes into the subject trailers. This does not include devices that are strictly intended for protection of Vulnerable Users, such as bicyclists or pedestrians.

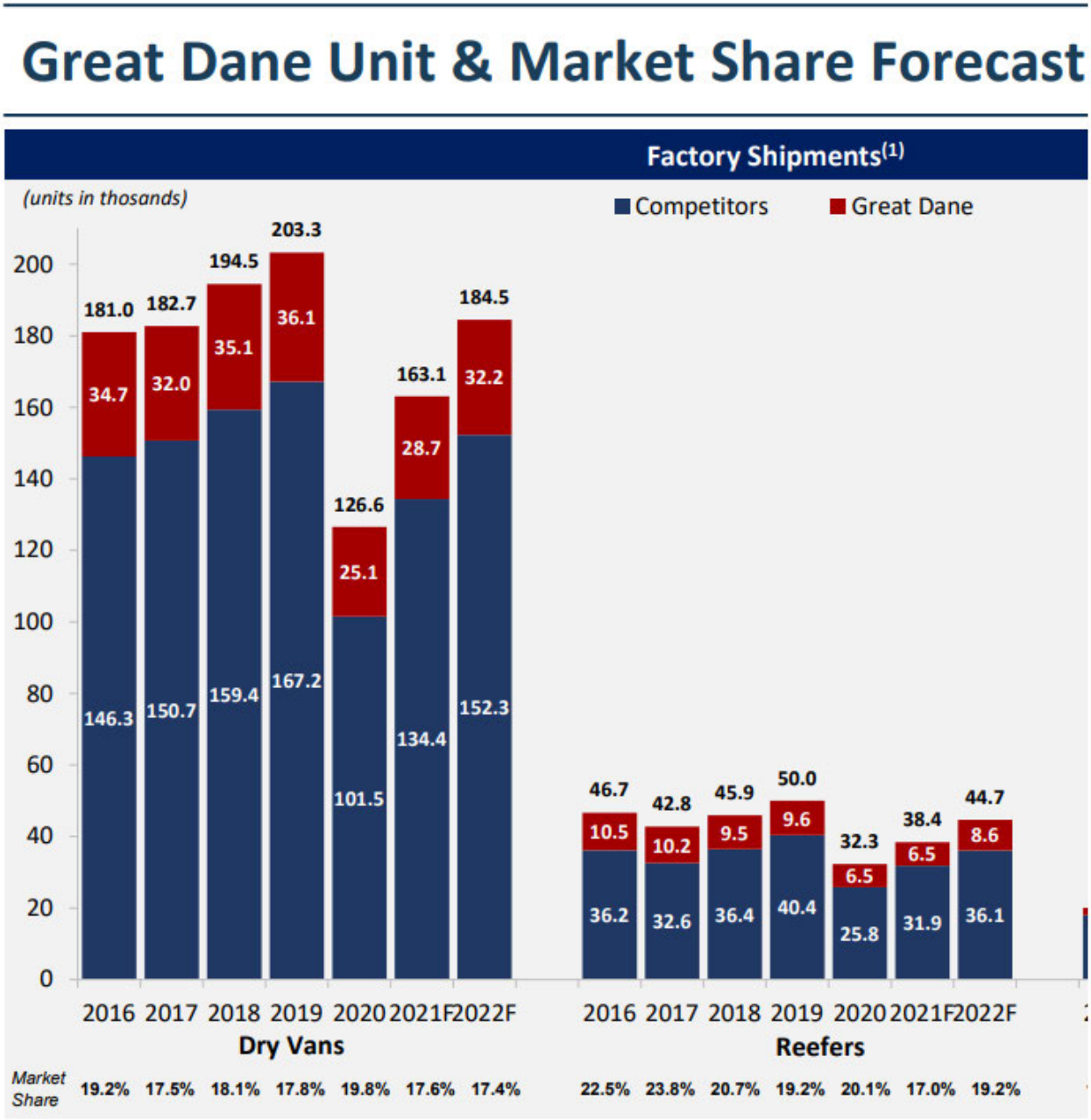
1. **State by Model Year the number of subject vehicles Great Dane has manufactured for sale or lease in the United States since 2006. Include by model year the number of subject vehicles which were manufactured by Great Dane with side underride guards as original equipment.**

Model Year	Dry Vans	Refrigerated	Total Vans	Total Vans with Side
2006	34,865	11,230	46,095	0
2007	40,852	11,427	52,279	0
2008	30,968	8,435	39,402	0
2009	15,686	6,914	22,600	0
2010	6,530	5,699	12,229	0
2011	11,012	7,280	18,292	0
2012	25,434	7,572	33,006	0
2013	29,938	8,485	38,423	0
2014	27,640	8,629	36,269	0
2015	30,978	9,296	40,274	0
2016	35,101	9,500	44,601	0
2017	32,975	10,421	43,396	0
2018	30,835	8,576	39,411	0
2019	31,823	8,677	40,500	0
2020	34,267	8,709	42,976	0
2021	25,205	6,036	31,241	0
2022	30,679	6,856	37,535	0

Notes:
1) Model Year 2022 includes trailers scheduled to be built as of December 16, 2021
2) Shipment data from JD Edwards used for MY 2006-2011; Build data from Power BI used for MY 2012-2023
3) For Model Years 2006-2011, trailers sold into US estimated based on percentage of US sales for MY 2012-2023

2. State the current or estimated number of Great Dane subject vehicles still in service for all model years. Based on Great Dane's experience in the used trailer markets, we generally anticipate that a dry freight van will have a 15 year useful life, and a refrigerated trailer will have a 10 year useful life. Overlaying those estimates with the data presented in #1, Great Dane estimates there are close to 400,000 Great Dane Dry Vans and 85,000 Great Dane Refrigerated Vans currently in service on the road today.

3. Please report Great Dane current percent of the subject vehicle market share.



Market share data based on ACT data.

4. Provide a brief summary of any and all reports, claims, or other notices received by Great Dane, or of which Great Dane is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles or vehicles equipped with side underride guards.

With regards to Subject Vehicles manufactured by Great Dane, there is one incident that Great Dane is aware of:

An automobile pulled out of a blind driveway into the roadway and struck the passing trailer in the landing gear area. The car was then struck by the battery box and subframe that was installed under the trailer, in the bay area. The matter was settled by the parties.

5. Does Great Dane currently offer side underride guards as standard or optional equipment? If yes, is it a Great Dane design or from another supplier? If from another supplier, identify the supplier and provide their contact information.

No. Indeed, at this time, Great Dane is not aware of a side underride guard system that is technologically feasible to function as a guard without compromising the operational status of the trailer.

6. Produce copies of all installation, service, warranty, and other documents that relate to, or may relate to, the subject component in the subject vehicles.

Attached you should find one (1) document that is responsive to this request. The name on the file of the document begins with "Response #6 …" This is a copy of the installation manual for an AngelWing device.

As I mentioned in our phone conversation, we are still working on the responses to items #7-10 and expect ot have them completed within the week. In an effort to provide as much information as quickly as possible, I am forward the responses to #1-6.

Hopefully this information will prove to be helpful in NHTSA's evaluation of side underride protection devices, their effectiveness, their availability, and necessity.

GREAT DANE

[redacted]

Daniel E. Carter
Director, Product Safety & Compliance