



STI HOLDINGS, INC.

January 10, 2022

Josh Neff
Chief, Medium & Heavy-Duty Vehicle Defect Division
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

RE: Defect Petition No. DP21-004

Dear Mr. Neff:

Attached are Stoughton Trailer, LLC's responses to your December 9, 2021 Information Requests in DP21-0004. Despite our request for additional time, we were able to respond to every question. We also are attaching what we believe are the most pertinent, responsive testing documents (two tests of the most recent iteration of our invention; a 2018 report regarding testing a reproduction of another company's aftermarket device; and a draft RP).

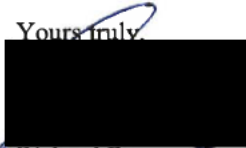
Some of the information in our written response and all the information in the attachments is subject to our request for confidentiality protection pursuant to 49 CFR 512. Thus, we are attaching redacted and unredacted versions, together with our completed Certificate in Support of Request for Confidentiality.

We do not believe that test reports or data from earlier iterations of our invention are pertinent, since we currently are not proceeding with those inventions. Of course, we certainly intend to cooperate with your investigation and are happy to work with you on follow up.

We believe we may have additional data and reports from testing of the aftermarket device about which you inquired (AngelWing) but, to date, we have not located them. We will continue our search and forward any additional such reports and data we are able to locate.

Please do not hesitate to contact me or our outside counsel for this matter, Daniel Rustmann, at the Detroit law firm Butzel Long at 313-225-7067 or rustmann@butzel.com for any follow up you may desire.

Yours truly,



Richard Raymond
General Counsel

Cc: G.L. Fenton
D. Rustmann, Esq.
J. Dukarski, Esq.