



**STRICK TRAILERS, LLC**  
301 NORTH POLK STREET  
MONROE, INDIANA 46772  
260-692-6121

January 10, 2022

VIA EMAIL – [Nate.Seymour@dot.gov](mailto:Nate.Seymour@dot.gov), [ODI\\_IRresponse@dot.gov](mailto:ODI_IRresponse@dot.gov)

National Highway Traffic Safety Administration  
Office of Defects Investigation – Med/Heavy Duty Vehicles  
1200 New Jersey Avenue SE  
Washington, D.C. 20590

RE: DP21-004 Response Letter

Good afternoon.

This letter is provided in response to the Information Request Letter directed to Strick Trailers, LLC (“Strick”) from the National Highway Traffic Safety Administration (“NHTSA”) dated December 9, 2021, regarding Defect Petition DP21-004. The information contained herein reflects Strick’s good faith efforts to respond to NHTSA’s inquiries with available resources within the requested timeframe, which included a ten day period during which the company was closed for the holidays.

1. **State by model year the number of subject vehicles Strick 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 Strick with side underride guards as original equipment.**

**Response:**

Between 1/1/2006 and 11/30/2021 Strick manufactured 29,149 van trailers for sale. See table below. It is estimated that 600 - 700 trailers included in this data were exported to Canada. None of the trailers listed in the table were manufactured with side underride guards as original equipment.

**Sources:** The production data for the period 1/1/2009 - 11/30/21 was gathered from Strick’s TREAD Act quarterly reports, which have been filed since Q4 of 2018 when Strick became subject to the high volume reporting requirements. Based on a search of delivery destination data on Strick’s ERP system, it is estimated that 600 – 700 trailers produced between 1/1/2009-11/30/21 were exported to Canada. The production data for the period 1/1/2006 - 12/31/2008 was gathered from Strick’s ERP system on 12/15/21.



Model Year	Type	Total Production
2007	VT	4508
2008	VT	2863
2009	VT	1299
2010	VT	426
2011	VT	741
2012	VT	889
2013	VT	2177
2014	VT	799
2015	VT	1585
2016	VT	1733
2017	VT	2288
2018	VT	2066
2019	VT	2431
2020	VT	2136
2021	VT	1777
2022	VT	1431
Total		29149

Beginning 1/1/2006  
Through 11/30/2021  
VT = Van Trailer

2. **State the current or estimated number of Strick subject vehicles still in service for all model years.**

**Response:**

Strick has insufficient information to provide a response. Strick manufactures customized van trailers for a wide range of customers, industries and uses, for which in-service periods are believed to vary.

3. **Please report Strick current percent of the subject vehicle market share.**

**Response:**

Strick's share of the subject vehicle market is approximately 1 – 2%.

**Source:** The estimate was extrapolated from data contained in the 2020 Trailer Output Report published by Trailer Body Builders magazine and available online at <https://www.trailer-bodybuilders.com/trailer-output/trailer-output-report-archive>.



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

**Response:**

In 2007 Strick was named as a defendant in *Maria Neli Ramirez Silva, Benjamin Barajas Martinez & Ascension Ramirez vs. Keystone Freight Corp. (Case No. VC048745 in the Superior Court of California, County of Los Angeles – Southeast District)*, which arose out of an April 30, 2007, accident on the I-710 Northbound Freeway in Los Angeles. Based on limited information available, it appears that the incident occurred when a tractor trailer swerved into another lane on the highway occupied by a Nissan Sentra with four passengers and hit and toppled a concrete construction barrier. As the tractor trailer rose over the downed barrier, the Nissan rode up against the concrete barrier and under the trailer and was subsequently struck from behind by a box truck, resulting in two fatalities. The trailer involved in the incident was manufactured by Strick in 2000. Other defendants included the owners and operators of the tractor trailer and box truck as well as the State of California. The case against Strick was settled.

**Sources:** A search was conducted of TREAD Act quarterly reports filed by Strick since it became a large volume filer in Q4 2018, Death and Injury Reports filed with NHTSA since the requirement went into effect in Q4 2003, and electronic and paper records of claims against Strick from 2005 to the present that were located after reasonable search. The *Silva* case was the subject of a Death and Injury Report submitted to NHTSA in Q3 2007.

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

**Response:**

Strick does not offer a side underride guard as standard equipment. Since Strick does not have a guard design, any guard installed at customer request would have to be commercially available, proven, and compatible with the trailer's design and other safety features. To date, Strick has received no customer requests for installation of a side underride guard.

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.**



**Response:** None

7. **Provide a brief summary of all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations that relate to, or may relate to the subject component that have been conducted, are being conducted, are planned, or are being planned by, or for, Strick.**

**Response:**

Strick in 1996 designed a side guard for pedestrians, cyclists, and motorcyclists for use on trailers that were exported to Europe. This guard was built and tested to conform with EEC requirements at that time. The standard the guard complied with was *Council Directive of 13 April 1989 on the approximation of the laws of the Member States to the lateral protection (side guards) of certain motor vehicles and their trailers*.

Strick in 2001 looked into the feasibility of developing a side underride guard for use on van trailers in the U.S. This guard concept consisted of a rigid frame forward of the suspension slide rails. It also included a telescoping feature that allowed for the “gap” to be filled forward of the suspension if the suspension was positioned to the rear. This guard did not have a “gap filler” behind the suspension when the suspension was positioned forward. This guard was a concept only; it was never built or tested in any fashion.

The Truck Trailer Manufacturers Association (TTMA) in 2020 set out to draft a Recommended Practice (RP) for side underride guards. The RP was intended to set forth guidelines for design considerations, testing and performance of a guard. However, the RP has not been completed or approved for distribution.

8. **Angelwing is one aftermarket manufacturer of side underride guards. Please assess the compatibility of this product with Strick trailers. See the following link for additional information: <http://www.angelwingskirts.com/>**
  - a. **Effect, if any, this guard will have on the structural integrity of Strick trailers;**
  - b. **The approximate weight adding this side underride guard will add to Strick trailers;**
  - c. **The approximate reduction in cargo carrying capacity adding this side underride guard will have on Strick trailers;**
  - d. **Effect, if any, this guard will have on the durability and service life of Strick trailers;**
  - e. **The approximate cost, including materials and labor for installation of these guards both on new production and in-service Strick units;**
  - f. **Effect, if any, this guard will have on the maneuverability and operating environment compatibility of Strick trailers;**



- g. Your assessment of the effectiveness this side underride guard would have preventing injury and death of other roadway users when installed on Strick trailers; and
- i. Your assessment of any additional concerns, issues, or benefits this side underride guard may have.

**Response:**

Strick is unfamiliar with this product, has no information other than what is on the internet, and has no firsthand knowledge to answer these questions.

9. **Safetyskirt is one aftermarket manufacturer of side underride guards. Please assess the compatibility of this product with Strick trailers. See link for additional information: <https://www.trailerguards.com/>**
- a. Effect, if any, this guard will have on the structural integrity of Strick trailers;
  - b. The approximate weight adding this side underride guard will add to Strick trailers;
  - c. The approximate reduction in cargo carrying capacity adding this side underride guard will have on Strick trailers;
  - d. Effect, if any, this guard will have on the durability and service life of Strick trailers;
  - e. The approximate cost, including materials and labor for installation of these guards both on new production and in-service Strick units;
  - f. Effect, if any, this guard will have on the maneuverability and operating environment compatibility of Strick trailers;
  - g. Your assessment of the effectiveness this side underride guard would have preventing injury and death of other roadway users when installed on Strick trailers; and
  - i. Please provide your assessment of any additional concerns, issues, or benefits this side underride guard may have.

**Response:**

Strick is unfamiliar with this product, has no information other than what is on the internet, and has no firsthand knowledge to answer these questions.

10. **Furnish Strick's assessment of the following in today's transportation system:**
- a. The feasibility of side underride guards.
  - b. The industry financial cost of side underride guards;
  - c. The effectiveness side underride guards may have preventing traffic crash injuries and fatalities;



- d. The potential changes in the US transportation system side underride guards may require; and
- e. The reports included with this inquiry.

**Response:**

- a. There are prototype side underride guard designs that are commercially available (Angelwing and Safetyskirt), and according to published data these guard designs prevent underride in tested circumstances. The effects of these designs, or any design, on the trailer structure and other trailer safety features are unknown to Strick and would have to be evaluated using actual guard samples.
- b. As to the commercially available guards, Strick does not have any cost information as this is not publicly available. The 2001 Strick side guard design concept for a van trailer, referenced in question 7 above, was never analyzed for cost or weight. As a general matter, the cost of any guard would be passed on to the customer, and since the added weight of a side guard will result in less freight being hauled per fully loaded trailer, more tractor trailer trips will be necessary to haul the same amount of freight. Beyond these general observations, Strick is unable to comment on the financial impact to the industry.
- c. Strick does not have firsthand knowledge necessary to answer this question. Strick is aware of tests performed by the Insurance Institute for Highway Safety on the Angelwing design, in which the guard prevented passenger compartment intrusion following impact of a 2010 Chevrolet Malibu into the center of a rear loaded trailer at a 90 degree angle at speeds of 35 and 40 mph. Considerations for determining the effectiveness of guards and how they are tested would include, but are not limited to: passenger car size and weight; the various potential impact angles between 0 and 180 degrees; impacting vehicle speed; trailer speed; the loaded weight of the trailer and how the load is distributed in the trailer; strike locations (including locations in any unguarded gaps in front of or behind sliding tandem axles); and occupant position, size, and seatbelt status.
- d. A rigid side underride guard presents challenges that would need to be addressed. There is the potential for ground clearance issues. When the trailer travels over railroad crossings, the crown of a loading dock ramp, or other significant "hump" in a road surface, there could be interference between the guard and the ground. This lower clearance may necessitate special driver training to avoid ground clearance issues. An impact of a trailer installed guard with the ground could damage the guard as well as the trailer. In addition to ground clearance, there is the issue of the weight



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of the guard. The more weight added to the trailer the less freight can be hauled, which results in more trips to move the same freight, more trailers on the road, and reduced fuel economy.

- e. No reports are included with this inquiry.

Please let me know if you have any questions about the information provided.

Thank you.



**Jan Hoover**

**Senior Vice President of Engineering**

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