



June 3, 2024

Joshua Neff, Chief
Medium and Heavy-Duty Vehicle Defect Division
Office of Defects Investigation
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Information Request ID RQ24007-02

Dear Joshua,

This letter and accompanying Access database is in response to your request for information dated April 26, 2024.

For below request; Reference Access database titled “PRODUCTION DATA”

1. State, by model and model year, the number of subject and peer vehicles PIC has manufactured for sale or lease in the United States. Separately, for each subject and peer vehicle manufactured to date by PIC, state the following:
 - a. Vehicle identification number (17-character VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Date of manufacture (MM/DD/YYYY);
 - f. Date warranty coverage commenced (MM/DD/YYYY);
 - g. Vehicle owner or fleet name (and fleet contact person) who originally purchased the vehicle, email address and telephone number (please use distinct fields for each data type);
 - h. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type); and
 - i. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation).

Provide the table in Microsoft Access 2010, or a compatible format, entitled “PRODUCTION DATA.” A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.



2. State the number of each of the following, received by PIC, or of which PIC is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators; One

On August 29, 2022, a phone call was received concerning deformation of a GN3040 frame. On July 7, 2022, Kent Musick and I visited Bear Logistics in Chicago, (a customer of National Chassis), to review the chassis in question. A slight bend in the mid-frame of the chassis was observed.

- b. Field reports, including dealer field reports; ***See attached Trip Report "Trip Report 7-7-2022 Bear Logistics"***
c. Reports involving a crash, injury, or fatality; ***None***
d. Property damage claims; ***None***
e. Third-party arbitration proceedings, both pending and closed, where PIC is or was a party to the arbitration; ***None***
f. Lawsuits, both pending and closed, in which PIC is or was a defendant or codefendant. ***None***

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 PIC's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" 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.

For below request; Reference Access database titled "REQUEST NUMBER TWO DATA "

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. PIC's file number or other identifier used; ***None***
b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.); ***None***
c. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type); ***Ryan Presnal***
d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
e. Vehicle's 17-character VIN;
f. Vehicle's make, model, and model year (please use distinct fields for each data type);
g. Vehicle's mileage at time of incident (numeric data type);
h. Incident date (MM/DD/YYYY);
i. Report or claim date (MM/DD/YYYY);
j. Whether a crash is alleged; ***NA***



- k. Whether property damage is alleged; *NA*
- l. Number of alleged injuries, if any; *NA*
- m. Number of alleged fatalities, if any. *NA*

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided 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 PIC used for organizing the documents. Describe in detail the search methods and search criteria used by PIC to identify the items in response to Request No. 2.

There has been only one complaint which is covered by the attached document labeled "Section 2 Item a Tripo Report 7-7-2022 Bear Logistics"

As a result of only one filed complaint which led to the trip report there is no search required.

For below request; Reference Access database titled "WARRANTY DATA "

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by PIC 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. PIC's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
- c. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
- d. 17-character VIN;
- e. Repair date (MM/DD/YYYY);
- f. Vehicle mileage at time of repair (numeric data type);
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);
- h. Labor operation number(s);
- i. Problem code(s);
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;
- l. Cause as stated on the repair order;
- m. Correction as stated on the repair order; and
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.



Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

6. Describe in detail the search methods and search criteria used by PIC to identify the claims in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used.

PIC uses data sheets to track by various models the VIN, customers name, and year built. The search was done to capture all subject vehicles for the recall. No peer vehicles were selected as they were built by previous ownership.

7. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject and peer vehicles.

Please reference attached spreadsheet titled RQ24007-02 Labor Codes-Subject Chassis PIC is in the process of re-framing all "Subject Chassis". PIC has no current process or action on "Peer" chassis as PIC did not manufacture the "Peer" chassis.

8. State, by make and model year, the terms of the new vehicle warranty coverage offered by PIC on the subject and peer 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 PIC 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.

Please reference attached spreadsheet titled RQ24007-02 Warranty Coverage Section 8 No extended warranties were offered for the "subject" chassis product. PIC has no knowledge of warranty coverage on "peer" units

9. Furnish PIC's assessment of the alleged defect in the subject vehicles, including:

- a. The causal or contributory factor(s); - ***When loaded with a 20 ft shipping container that is loaded above the rated load a failure occurs that can be as little as slight bending or a metal failure in the mid beam area near the gooseneck assembly.***
- b. The failure mechanism(s); - ***Bending or metal failure of the mid-beam near the gooseneck frame joint***
- c. The failure mode(s); ***bending of the "I" beam and or metal failure of the same.***
- d. The risk to motor vehicle safety that it poses; - ***If a complete metal failure were to occur in the mid beam a separation of the gooseneck frame to the rear portion of the trailer would occur allowing the trailer to potentially detach from the pulling unit.***
- 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; - ***Visual review of the unit shows bending of the components before any metal failure occurs when reviewing the trailer from the outside.***



f. The reports included with this inquiry. – *A complete third-party FEA was conducted on the new design using an overload condition and compared to the old design to be sure the issue was resolved.*

10. Provide the purchase and sale agreement, for the sale of Pratt Industries Intermodal Chassis, between LFM Capital and North American Chassis Pool Cooperative (NACPC).

Respectfully,

PRATT INTERMODAL CHASSIS, LLC



By: Barry Hines
Vice President of Engineering