

Cottrell, Inc.

January 14, 2004

**VIA FACSIMILE &
FEDERAL EXPRESS**

Associate Administrator for Safety Assurance (NSA-01)
National Highway Traffic Safety Administration
Attn: Ms. Pat Wallace
400 7th Street, SW
Washington, DC 20590

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04V-026 ①of④

Re: Recall of Cottrell C-8ENC

Dear Ms. Wallace:

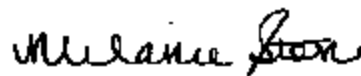
Please find enclosed Cottrell's Part 573 Defect Report related to the recall of Cottrell C-8ENC enclosed car-haul trailers. I understand from our telephone conference that, due to the fact that all of these units were manufactured for and sold to a single owner with whom we are in constant contact about this matter, no "official" owner notification is necessary. As a result, we are not submitting a draft owner notification letter or draft notification envelope with our 573 Report. I also understand that this recall will not be included in the monthly recall news release, so we are not submitting a request for exemption as we had initially planned to do.

If I am misstating our conversation in any way, or if I am misunderstanding our obligations with respect to this recall, please let me know and I will do whatever is necessary to rectify that situation immediately.

We will provide updates as additional information becomes available. In the interim, please do not hesitate to call me with any questions you might have. In the event I am not available and you need information immediately, please direct your inquiries to Mr. Bryan Howes.

Thank you very much for your assistance.

Sincerely,



Melanie S. Stone

Encl.

cc: Mr. Bryan Howes, w/ encl.



2125 Candler Road
Gainesville, GA 30607
(770) 532-7251 Ext. 286
(770) 532-2284 Direct Fax
www.cottrelltrailers.com



PART 573 Defect and Noncompliance Reporting

Defect Report

Report Date: January 14, 2004

1. Vehicles affected are manufactured by:

Cottrell, Inc.
2125 Candler Road
Gainesville, GA 30507

2. The following vehicles are being recalled:

All Cottrell C-8ENC enclosed car-haul trailers manufactured from September 2002 (initial start of production for such units) through November 2003 (last such unit produced and placed into the stream of commerce). All of these units were manufactured for, and sold to only one customer. A list of VIN numbers can be provided upon request.

3. The total number of vehicles subject to recall:

54

4. The approximate percentage of vehicles from #3 above estimated to actually be affected:

Preliminary inspections reveal that 10% of the units subject to recall show premature cracking in the area of the weld. Cottrell plans to rework 100% of the subject units manufactured.

5. Description of the defect:

During production, a component ("landing leg bracket") was welded to a structural member (part of the kingpin assembly) that is subject to higher stresses than other surrounding components. Improper welding of this component in this particular location may cause a reduction in strength and/or a stress concentration in the structural member that may cause premature cracking in the area of the weld, which could eventually result in a potential failure of the structural member. Should such a failure occur, it could result in the detachment of the trailer from the tractor. (See photographs below for a picture of the vehicle at issue and a close-up of the subject weld site).



Figure 1: Overall picture of vehicle. Arrow pointing to area of weld site.



Figure 2: Close-up picture of area of weld site.

6. The following data is the basis for the determination to recall these vehicles:

- 1/08/04 – Notification from customer that failure had occurred resulting in accident.
- 1/09/04 – Inspection/field analysis on failed unit at accident site.
- 1/10/04 – Conducted review of like vehicles through pictures provided by customer, and performed engineering analysis of affected area. Determined that potential exists that a premature failure in the area of the weld could affect vehicle safety of all like vehicles, and that such vehicles should be recalled.

7. The remedy is as follows:

Remedial options are still undergoing testing and evaluation. However, we have been in constant communication with the customer since we were notified about the accident on January 8, 2004. Presently, all units are undergoing inspection and are being removed from service as needed. Preliminary plans are being made for all units to be returned to Cottrell for repair.

8. Notification:

Only one customer is at issue because all affected units were manufactured for, and sold to one customer. As stated above, we have been in constant communication with the customer, and we are working hand-in-hand to inspect the units, remove them from service as needed, and make the needed repairs as soon as possible. We understand from our telephone conference with Ms. Pat Wallace that no "official" owner notification letter is necessary under these circumstances.

9. Cottrell will use the identification number assigned by NHTSA for this recall.

10. Questions regarding this recall should be directed to:

1. **Melanie Stone**
Cottrell, Inc.
2125 Candler Road
Gainesville, GA 30507
(770) 532-7251, ext. 285

Or, if not available, then to:

2. **Bryan Howes**
Cottrell, Inc.
2125 Candler Road
Gainesville, GA 30507
(770) 532-7251, ext. 258

Report Submitted by 
Melanie Stone, Cottrell, Inc.