



STRICK CORPORATION

225 Lincoln Highway

Fortress Hills

Pennsylvania, USA

19030.0009

215.949.3600

■

May 26, 2004

RECEIVED
178-215
2004 JUN -2 A 7 17
OFFICE OF
DEFECTS INVESTIGATION

04V-260
(33 pages)

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

Dear Administrator:

Strick Corporation has been informed that Sealco Commercial Vehicle Products, Inc. ("Sealco") has determined that a defect which relates to motor vehicle safety exists in the item of motor vehicle equipment described below and has notified the National Highway Traffic Safety Administration. Attached as Exhibit "A" is a copy of a letter from Sealco describing the said defect. Also attached as Exhibit "B" is a copy of a monthly submission report pursuant to the TREAD Act in this regard. Also attached as Exhibit "C" is a copy of a letter sent to Tom Bowman of NHTSA from Sealco dated December 19, 2003.

1. The name of the manufacturer is Strick Corporation, and the products are sold under the "Strick" brand name.
2. The item(s) of equipment containing a defect is the small rubber component part that is utilized in certain valves that were manufactured at Sealco between June 1, 2003 and November 17, 2003. The subject component part is a 508 Rubber Band Check Valve that is used on the 110502 brass Control Port Cap Assembly which is installed in the control port of their 110500, 110700 and 110800 Spring Brake Control Valves. The inclusive dates of manufacturing of the valves containing the affected component are June 1, 2003 to November 17, 2003.
3. The total number of vehicles manufactured and sold by Strick Corporation in the U.S. during the relevant time period was 2,021 units. Strick Corporation does not know the precise percentage of these valves that contain this defect, however, Sealco states that the entire population of valves containing the suspect

LEONARD BARKAN

Special Counsel

email: ddale@dlamatrix.net

215.949.4712

Fax 215.949.4775



Associate Administrator for Enforcement

May 26, 2004

Page 2

component shipped during the relevant time period for installation on new vehicles was 96,000. The affected population includes the entire production of the vehicles in which said valves were installed.

4. Sealco has determined that a defect in the defective rubber band check valve may develop a hole allowing supply air to escape back out the control line exhausting at either the foot valve in the tractor or any tractor in-line quick release valve.
5. We are not aware of any accidents or injuries involving this product. At this time, Sealco is aware of 100 complaints involving valves and has received back 30 valves that they have verified as containing the defect.

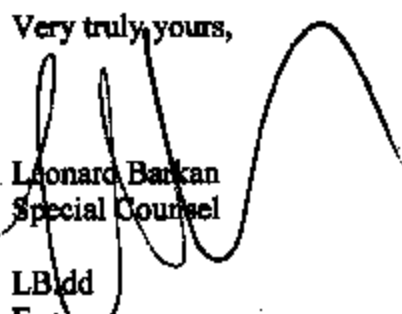
6, 7, & 8

Attached as Exhibit "D" is a copy of a sample letter from Sealco to the customers outlining the program for providing a remedy without charge for the defect.

Sealco has conducted the owner notification on or about April 26, 2004. A copy of the recall notice to trailer purchasers, fleets and end users is attached as Exhibit "D".

If you have any questions, please contact the undersigned.

Very truly yours,



Leonard Barkan
Special Counsel

LB:dd
Enc.

VIA AIRBORNE

FAX FAX FAX FAX FAX FAX FAX FAX FAX FAX FAX FAX



Sealco Commercial Vehicle Products



215 East Watkins Street • Phoenix, Arizona 85004 • 602/253-1007 • Fax 800/222-2394

TO: Leonard Barkman & Donna Daley
DATE: 5-7-04
FROM: Larry Saylor
FAX NO: 215/949-4775
PAGES: 5

MESSAGE: Enclosed are copies of the form letter Sealco sent to all North American trailer OEMs who purchased the valves that are the subject of the Notice Of Defect during the effected time frame as well as a copy of the original letter we sent to NHTSA.

If you have any questions or if we may be of further service please give us a call.

January 22, 2004

USA Trailer OEM
1234 Any Street
Any City, State 12345
Attention: Mr. _____

Re: NOTICE OF DEFECT

Dear Mr. _____:

Sealco has recently become aware of a possible defect in a small rubber component part that is utilized in certain valves that were manufactured at Sealco between 8-1-03 and 11-17-03. The subject component part is a 508 Rubber Band Check Valve that is used on the 110502 brass Control Port Cap Assembly which is installed in the control port of our 110500, 110700 and 110800 Spring Brake Control Valves. The subject component part was supplied to Sealco by a long time vendor who apparently changed; without Sealco's knowledge or authorization, the rubber compound used to mold the part in such a manner that a few of the parts have failed in the field. All of the valves shipped by Sealco after 11-17-03 contain a 508 Check Valve with a higher durometer and the specified rubber compound which will assure that the check valve does not fail going forward.

The reported failure mode of check valve is that it develops a hole allowing supply air to escape back out the control line exhausting at either the foot valve in the tractor or any tractor in-line quick release valve. While we have received some reports of hot wheel ends, we have been unable to duplicate this scenario in our lab or on our own tractor trailer. In the two such incidents where we have physically inspected the reports, the hot wheel ends were both caused by other conditions not related to the valve.

Out of approximately 71,000 valves containing the suspect component part sold to U.S. trailer OEMs in this timeframe, we have had less than 100 complaints and have received back only 30 valves where we have verified the defect. Sealco has kept NHTSA fully advised of this situation as it has occurred and has sought their counsel with respect to the best course of action. Even though the percentage of failure of the component part is very small and we have no conclusive evidence that it creates a safety problem,

Sealco has decided to offer replacement 110502 Cap Assemblies containing the component part at no charge to trailer OEM and/or their fleet customers.

IDENTIFYING THE PROBLEM - This potential defect only pertains to Sealco 110500, 110700 and 110800 Spring Brake Control Valves manufactured from 6-1-03 through 11-17-03. Enclosed is a Service Bulletin that will assist you in identifying the subject valves and installing the replacement 110502 Cap Assembly.

SOLVING THE PROBLEM - By replacing the 110502 Cap Assembly on the subject valves with a new assembly containing a new 508 Check Valve, the potential failure mode of the check valve is removed. Sealco will provide replacement 110502 Cap Assemblies directly to your fleet customers at no charge. The replacement item is easily installed in just a couple of minutes without any special tools.

WHAT YOU NEED TO DO - Our records indicate that you purchased some of the Sealco valves that contained the potentially defective component part. You need to provide us with the following information on a computer floppy disk in a Microsoft Excel format as soon as possible on all trailers you manufactured with the suspect valves.

Customer's Name	Date Sold
Street Address	Number Of Trailers Sold
City / State / Zip Code	Trailer Model
Contact Name	Which Sealco Valve Used
Phone Number	Vehicle Identification Number

WHAT SEALCO WILL DO - We will contact your customers on the list, notify them of the potential defect, provide them with the Service Bulletin and offer to send them the 110502 replacement Cap Assemblies. We will request that they fax back information on the trailers where they replace the Cap Assembly.

While we apologize in advance for the inconvenience this may cause you and/or your customer, we believe that it is the best course of action at this time. If you have any questions please contact your Sealco Regional Manager, Tom Mario or me.

Sincerely,

Larry Saylor
Vice President - Domestic Sales

enclosure



Sealco Commercial Vehicle Products, Inc.

215 East Watkins Street • Phoenix, Arizona 85004 • 602/253-1007 • Fax 602/222-2334

SERVICE BULLETIN

January 2004

Sealco 110500, 110700 & 110800 Spring Brake Control Valves manufactured from 6-1-03 thru 11-17-03 include a #110502 brass Control Port Cap Assembly in the control port that may contain a defective rubber band check valve. The check valve may develop a hole allowing air to escape back out the control line exhausting at either the foot valve in the tractor or any in-line quick release valve. This Service Bulletin will assist in the identification of the valves with the potential problem & installation of a new 110502 brass Cap Assembly containing the check valve.

VALVE IDENTIFICATION FOR CHANGING 110502 BRASS CAP ASSEMBLY

The manufacture date of the valve is determined by the Date Code Symbol stamped into the valve. The 110500 is stamped on the Reservoir Port on the side above the Sealco oval logo. The 110700 & 110800 are stamped on the brass screw cap on top of the valve. Date Code Symbols shown below for Jun, Jul, Aug, Sep, Oct & Nov are the valves that require the changing of the 110502 Brass Cap Assembly. Valves with a Date Code Symbol of Dec or later do not need to have the 110502 replaced.



JUNE



JULY



AUGUST



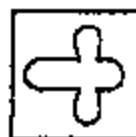
SEPTEMBER



OCTOBER



NOVEMBER



DECEMBER

INSTALLATION INSTRUCTIONS FOR CHANGING 110502 BRASS CAP ASSEMBLY

CAUTION: Exhaust air pressure in the supply line, apply parking brakes

Step 1 – Remove the blue control line from it's fitting (Picture 1)

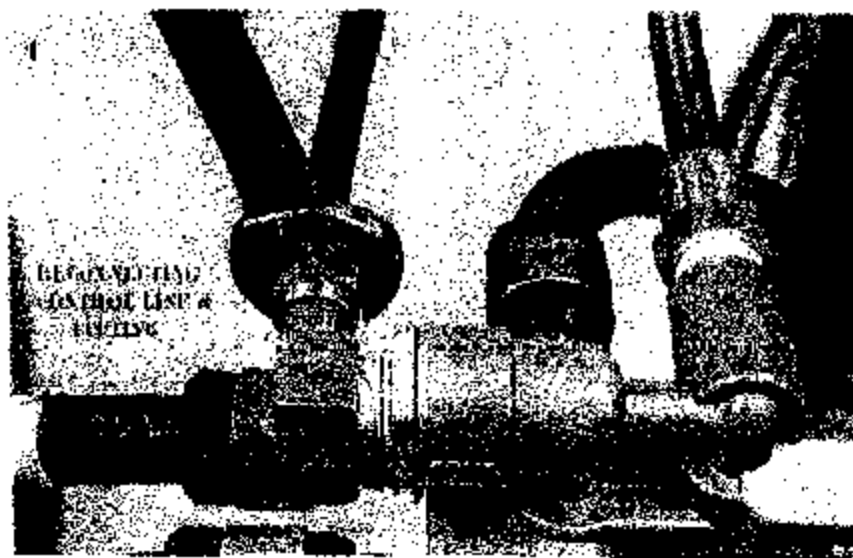
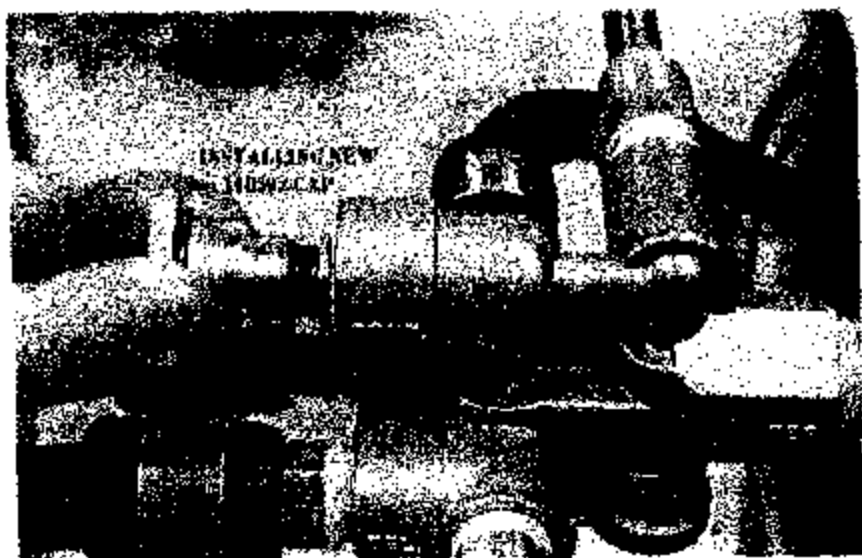
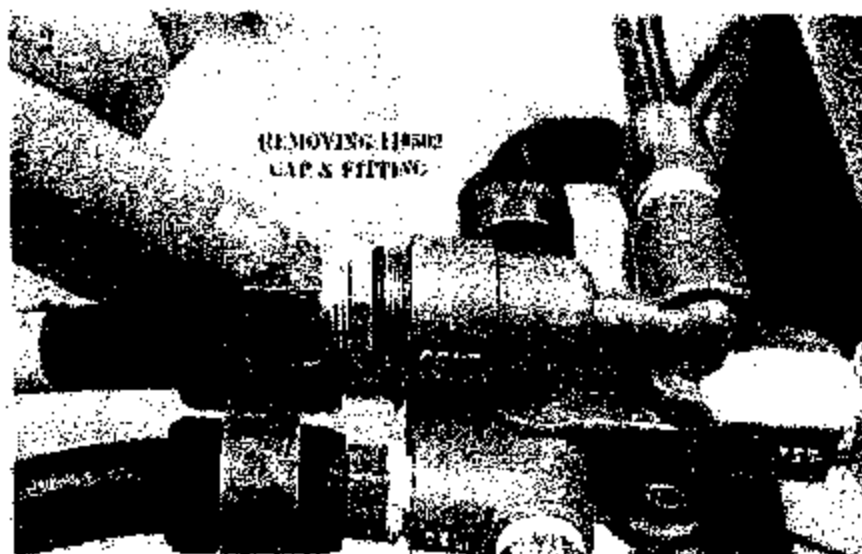
Step 2 – Remove 110502 Brass Cap & fitting from Control Port of valve (Picture 2)

Step 3 – Remove the fitting from the 110502 Brass Cap Assembly

Step 4 – Install new 110502 Brass Cap Assembly with torque of 6-8 ft. lbs. (Picture 3)

Step 5 – Install the fitting back into the new 110502 Brass Cap Assembly

Step 6 – Connect the blue control line back into the fitting (Picture 4)





STRICK CORPORATION

225 Lincoln Highway

Fairless Hills

Pennsylvania, USA

19030.0009

215.949.3600

April 5, 2004

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: TREAD Act - Monthly Submission Report for March 2004

To Whom It May Concern:

In accordance with the requirements of the TREAD Act with regard to any notices or other "campaign" documents as defined under Sec. 579.5 to submit for the month of March 2004, this is to advise that Sealco Commercial Vehicle Products, Inc. has determined that there is a possible defect in a small rubber component part that is utilized in certain valves that were manufactured at Sealco between June 1, 2003 and November 17, 2003. These parts were utilized in the manufacture of certain vehicles by Strick Corporation. Strick Corporation has provided a customer list to Sealco who will conduct the owner notification.

A copy of the notice being sent to the customers of Strick Corporation by Sealco is enclosed with this letter.

Sincerely,

Leonard Barkan
Special Counsel

Enc.

VIA AIRBORNE

LEONARD BARKAN

Special Counsel

email: delaley@diamondtx.net

215.549.4712

Fax: 215.949.4775

February 3, 2004

USA Trailer Fleet
1234 Any Street
Any City, State 12345
Attention: Mr. _____

Re: NOTICE OF DEFECT

Dear Mr. _____:

Sealco has become aware of a possible defect in a small rubber component part that is utilized in certain valves that were manufactured at Sealco between 6-1-03 and 11-17-03. Your company has been identified by one or more trailer manufacturer(s) as having received trailers that contain these parts. The subject component part is a Rubber Band Check Valve that is used on the 110502 brass Control Port Cap Assembly which is installed in the control port of our 110500, 110700 and 110800 Spring Brake Control Valves.

The reported failure mode of check valve is that it develops a hole allowing supply air to escape back out the control line exhausting at either the foot valve in the tractor or any tractor in-line quick release valve. To date we have confirmed 40 such failures of the out of approximately 86,000 valves shipped during the suspect time frame.

Even though the percentage of failure of the component part has been very small and we have no conclusive evidence that it creates a safety problem, Sealco has decided to offer replacement 110502 Cap Assemblies containing the subject component part at no charge to trailer OEMs and their fleet customers.

IDENTIFYING THE PROBLEM – This potential defect only pertains to Sealco 110500, 110700 and 110800 Spring Brake Control Valves manufactured from 6-1-03 through 11-17-03. Enclosed is a Service Bulletin that will assist you in identifying the subject valves by their date code symbol and installing the replacement 110502 Cap Assembly.

SOLVING THE PROBLEM – By replacing the 110502 Cap Assembly on the subject valves with a new assembly containing a new check valve, the potential failure mode of the check valve is removed. Sealco will provide

replacement 110502 Cap Assemblies directly to you at no charge. The replacement item is easily installed in just a couple of minutes without any special tools.

WHAT YOU NEED TO DO – We have been notified by one or more trailer OEM(s) that you have purchased trailers equipped with a Sealco 110500, 110700 or 110800 Spring Brake Control Valve manufactured during the suspect period that contain the potentially defective component part.

Please fax us the quantity of 110502 replacement Cap Assemblies you need to install on your trailers with the suspect valves at 800/222-2334 to the attention of Danielle Charpentier. We will ship you the 110502 replacement Cap Assemblies at no charge for installation on your trailers. If you need to know any information supplied to us by the OEM's, such as VIN #'s, Date Sold, etc., please call Danielle at 602/253-1007.

After you have installed the Cap Assemblies on your trailers, please use the enclosed form to fax back this information to us so that we can keep track of the trailers that have had the 110502 Cap Assembly replaced.

We apologize in advance for any inconvenience this may cause you, however we believe that it is the best course of action at this time. If you have any questions please contact your local Sealco Regional Manager or me.

Sincerely,

Thomas A. Mario
Vice President Sales

enclosure



SERVICE BULLETIN

January 2004

Sealco 110500, 110700 & 110800 Spring Brake Control Valves manufactured from 6-1-03 thru 11-17-03 include a #110502 brass Control Port Cap Assembly in the control port that may contain a defective rubber band check valve. The check valve may develop a hole allowing air to escape back out the control line exhausting at either the foot valve in the tractor or any in-line quick release valve. This Service Bulletin will assist in the identification of the valves with the potential problem & installation of a new 110502 brass Cap Assembly containing the check valve.

VALVE IDENTIFICATION FOR CHANGING 110502 BRASS CAP ASSEMBLY

The manufacture date of the valve is determined by the Date Code Symbol stamped into the valve. The 110500 is stamped on the Reservoir Port on the side above the Sealco oval logo. The 110700 & 110800 are stamped on the brass screw cap on top of the valve. Date Code Symbols shown below for Jun, Jul, Aug, Sep, Oct & Nov are the valves that require the changing of the 110502 Brass Cap Assembly. Valves with a Date Code Symbol of Dec or later do not need to have the 110502 replaced.



JUNE



JULY



AUGUST



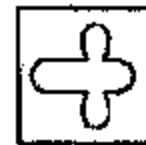
SEPTEMBER



OCTOBER



NOVEMBER



DECEMBER

INSTALLATION INSTRUCTIONS FOR CHANGING 110502 BRASS CAP ASSEMBLY

CAUTION: Exhaust air pressure in the supply line, apply parking brakes

Step 1 – Remove the blue control line from it's fitting (Picture 1)

Step 2 – Remove 110502 Brass Cap & fitting from Control Port of valve (Picture 2)

Step 3 – Remove the fitting from the 110502 Brass Cap Assembly

Step 4 – Install new 110502 Brass Cap Assembly with torque of 8-8 ft. lbs. (Picture 3)

Step 5 – Install the fitting back into the new 110502 Brass Cap Assembly

Step 6 – Connect the blue control line back into the fitting (Picture 4)

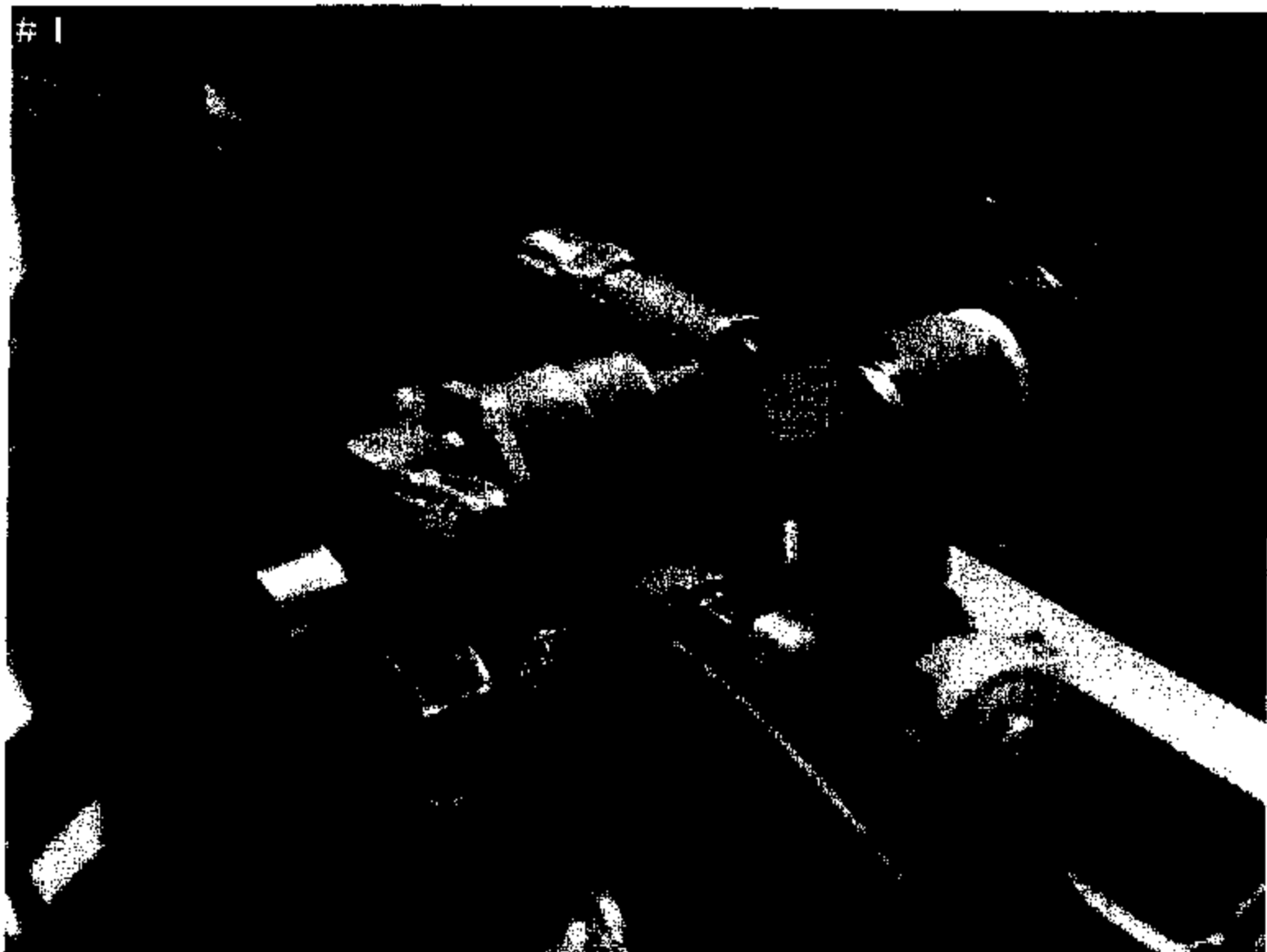


How to service the anti-compounding check valve in our 110500 and 110700.

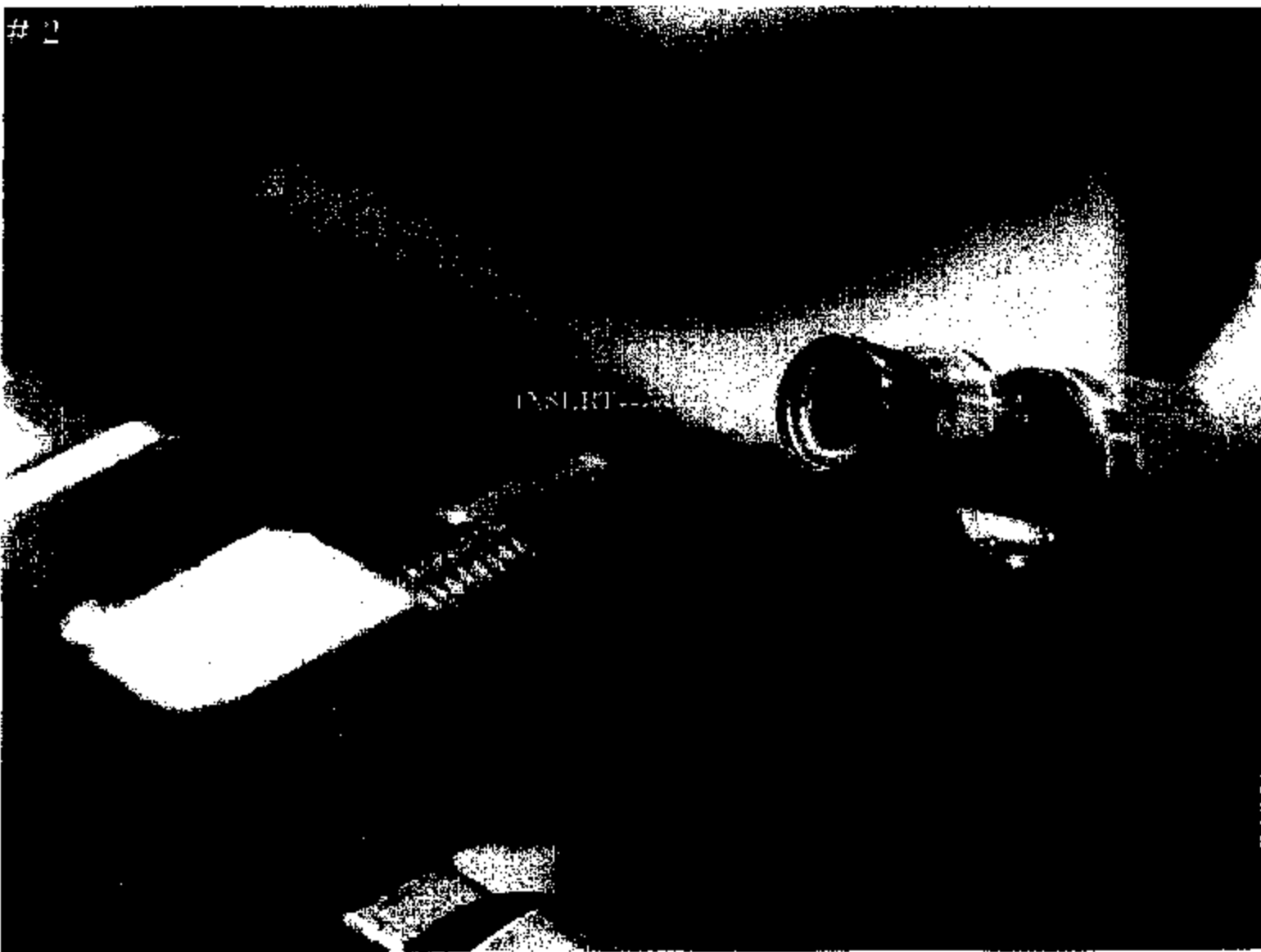
CAUTION: Exhaust air pressure in the supply line, apply parking brakes.

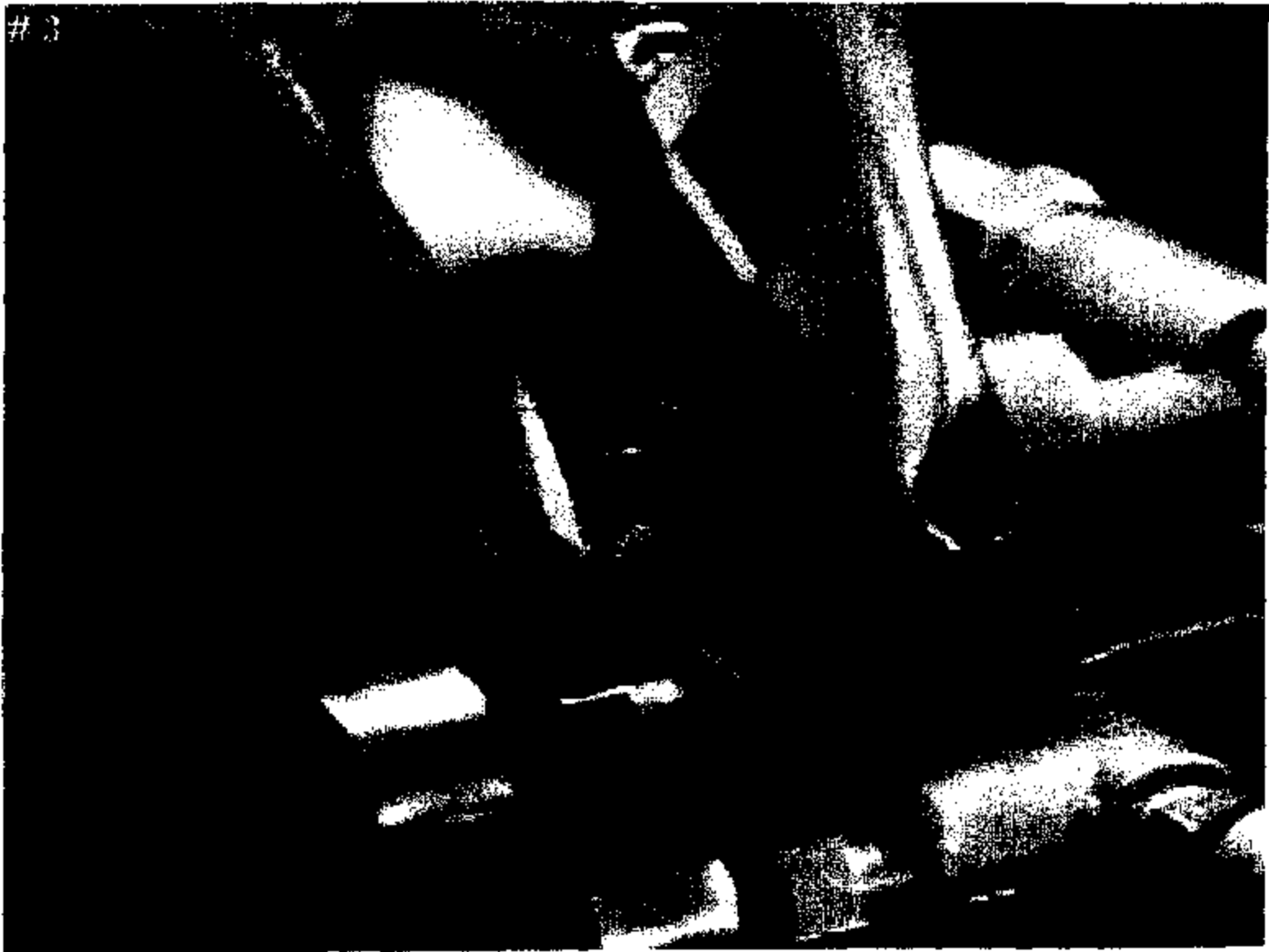
- Remove control line (blue) - Picture #1, #2
- If insert stays in the fitting remove insert - Picture #2
- Hold cont. brass cap with wrench, remove control line fitting - Picture #3
- Remove cont. brass cap - Picture #4
- Install new cont. brass cap, torque the cap to 8-8 ft. lbs. - Picture #5
- Install control line fitting - Picture #5
- Install control line (blue) - **CAUTION:** Be sure insert is in control line, see Picture #2

1

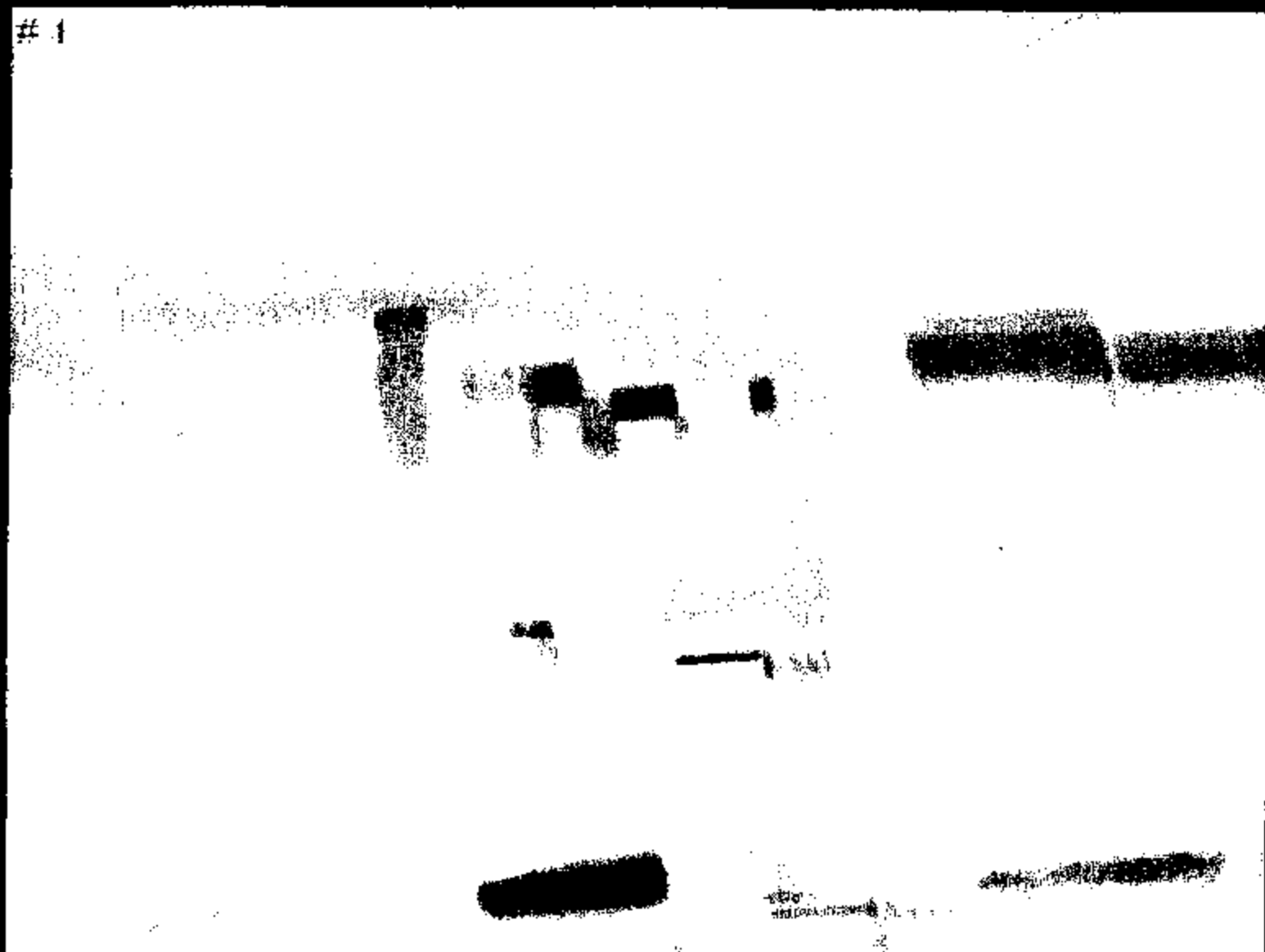


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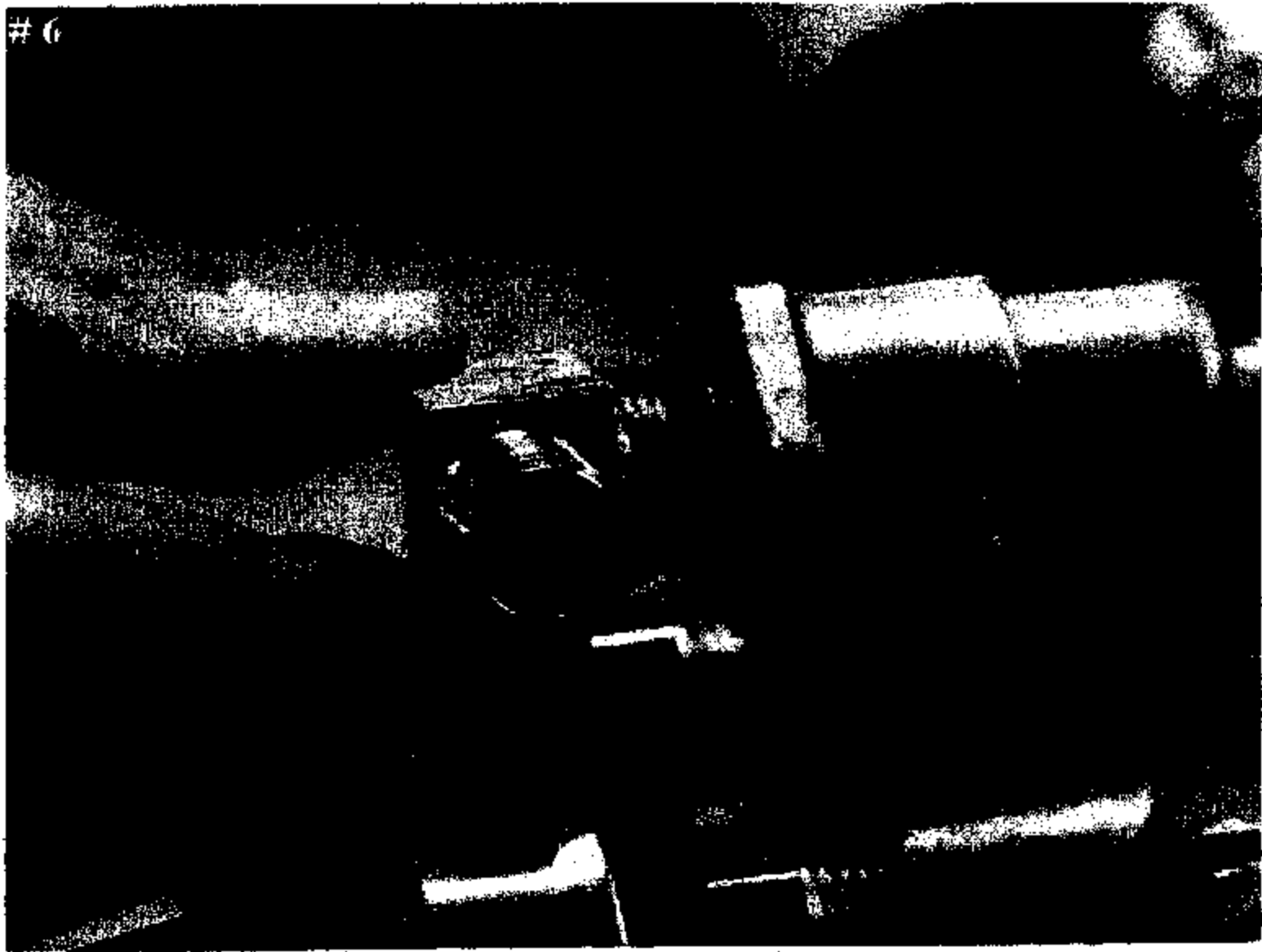
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5



6



7





Sealco Commercial Vehicle Products

215 East Watkins Street • Phoenix, Arizona 85004 • 602/263-1007 • Fax 602/222-2334

December 18, 2003

Mr. Tom Bowman
National Highway Traffic Safety Administration
400 7th Street, S.W.
Washington, DC 20590

Dear Mr. Bowman:

In response to our telephone conversation yesterday, we have enclosed the following items for your review:

- #110500 Spring Brake Control Valve (cut-a-way)
- #7080 Cap (brass)
- #508 Check Valve (rubber band)
- Cut-A-Way Drawing of #110502
- Air Schematic Diagram of #110500 SBCV

To recap the issue we discussed, we have received twenty (20) field reports of minor air leaks from the control port of our Spring Brake Control Valves beginning in late October of this year. Upon return of these valves for warranty inspection in early November we discovered that they leaked air due to a small hole in the #508 rubber band check valve allowing air to flow into the hole in the #7080 brass cap and out the control port.

We have conducted extensive testing on our simulator in our lab as well as on our own trailer and found that the leaking air traveled back up the control line and exhausted at either the in-line Quick Release Valve, if one existed, and/or the Foot Valve in the tractor as this line is open to atmosphere. While we did receive a complaint from one fleet customer of "hot brakes", we have been unable to duplicate any scenario that would create an application of the brakes. We therefore have no reason to believe that there is any relationship to safety connected with this malfunction at this time.

Our long time supplier of the #508 check valve has repeatedly stated that there has been no change in the material or processes used to produce this component and therefore can offer us no explanation for the occasional failure of the product. In an effort to obtain an outside, independent opinion, we have sent three sets of #508 check valves to Smithers Scientific Services in Akron, Ohio; 6 of the failed check valves, 6 check valves produced from 1999 to 2001

and 30 of the current stock of check valves. Smithers will test the check valves to determine their basic composition, specific chemical content of acrylonitrile, plasticizer and carbon and dimensional integrity. We anticipate the results of these tests to be reported today or Monday.

On November 19th we ceased shipping Spring Brake Control Valves with the #508 check valve and made the following modifications. We had the check valve supplier increase the durometer of the rubber, which increases the strength of the check valve, and we decreased the machined hole diameter in the #7080 cap. While these changes will have no effect on the function of the Spring Brake Control Valve or the internal check valve, they serve to lessen any possibility of the check valve developing a hole and therefore a leak.

As we discussed on the phone, the #508 functions as an anti-compounding one-way check valve inside the Spring Brake Control Valve. If you would like a more detailed description of how it functions under various conditions in the air brake system please give Tom a call at your convenience.

We will continue to aggressively pursue our investigation of the problem and monitor any additional reports of the situation. We look forward to updating you on our progress in the near future.

Sincerely,



Thomas A. Mario
Vice President



Larry Saylor
Vice President

enclosures



Sealco Commercial Vehicle Products, Inc.

215 East Watkins Street • Phoenix, Arizona 85004 • 602/253-1101 • Fax 800/222-2334

SERVICE BULLETIN

January 2004

Sealco 110500, 110700 & 110800 Spring Brake Control Valves manufactured from 6-1-03 thru 11-17-03 include a #110502 brass Control Port Cap Assembly in the control port that may contain a defective rubber band check valve. The check valve may develop a hole allowing air to escape back out the control line exhausting at either the foot valve in the tractor or any in-line quick release valve. This Service Bulletin will assist in the identification of the valves with the potential problem & installation of a new 110502 brass Cap Assembly containing the check valve.

VALVE IDENTIFICATION FOR CHANGING 110502 BRASS CAP ASSEMBLY

The manufacture date of the valve is determined by the Date Code Symbol stamped into the valve. The 110500 is stamped on the Reservoir Port on the side above the Sealco oval logo. The 110700 & 110800 are stamped on the brass screw cap on top of the valve. Date Code Symbols shown below for Jun, Jul, Aug, Sep, Oct & Nov are the valves that require the changing of the 110502 Brass Cap Assembly. Valves with a Date Code Symbol of Dec or later do not need to have the 110502 replaced.



JUNE



JULY



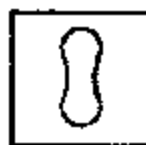
AUGUST



SEPTEMBER



OCTOBER



NOVEMBER



DECEMBER

INSTALLATION INSTRUCTIONS FOR CHANGING 110502 BRASS CAP ASSEMBLY

CAUTION: Exhaust air pressure in the supply line, apply parking brakes

Step 1 – Remove the blue control line from it's fitting (Picture 1)

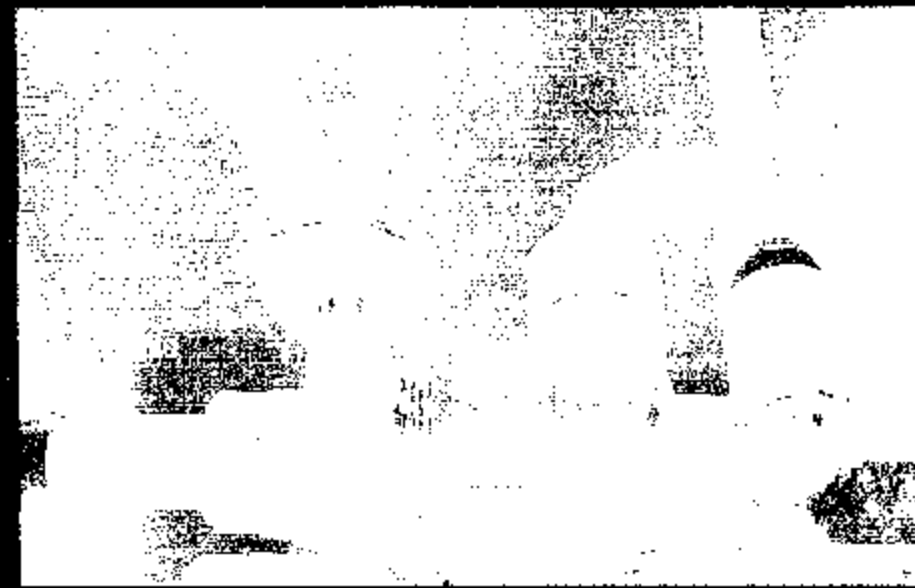
Step 2 – Remove 110502 Brass Cap & fitting from Control Port of valve (Picture 2)

Step 3 – Remove the fitting from the 110502 Brass Cap Assembly

Step 4 – Install new 110502 Brass Cap Assembly with torque of 6-8 ft. lbs. (Picture 3)

Step 5 – Install the fitting back into the new 110502 Brass Cap Assembly

Step 6 – Connect the blue control line back into the fitting (Picture 4)

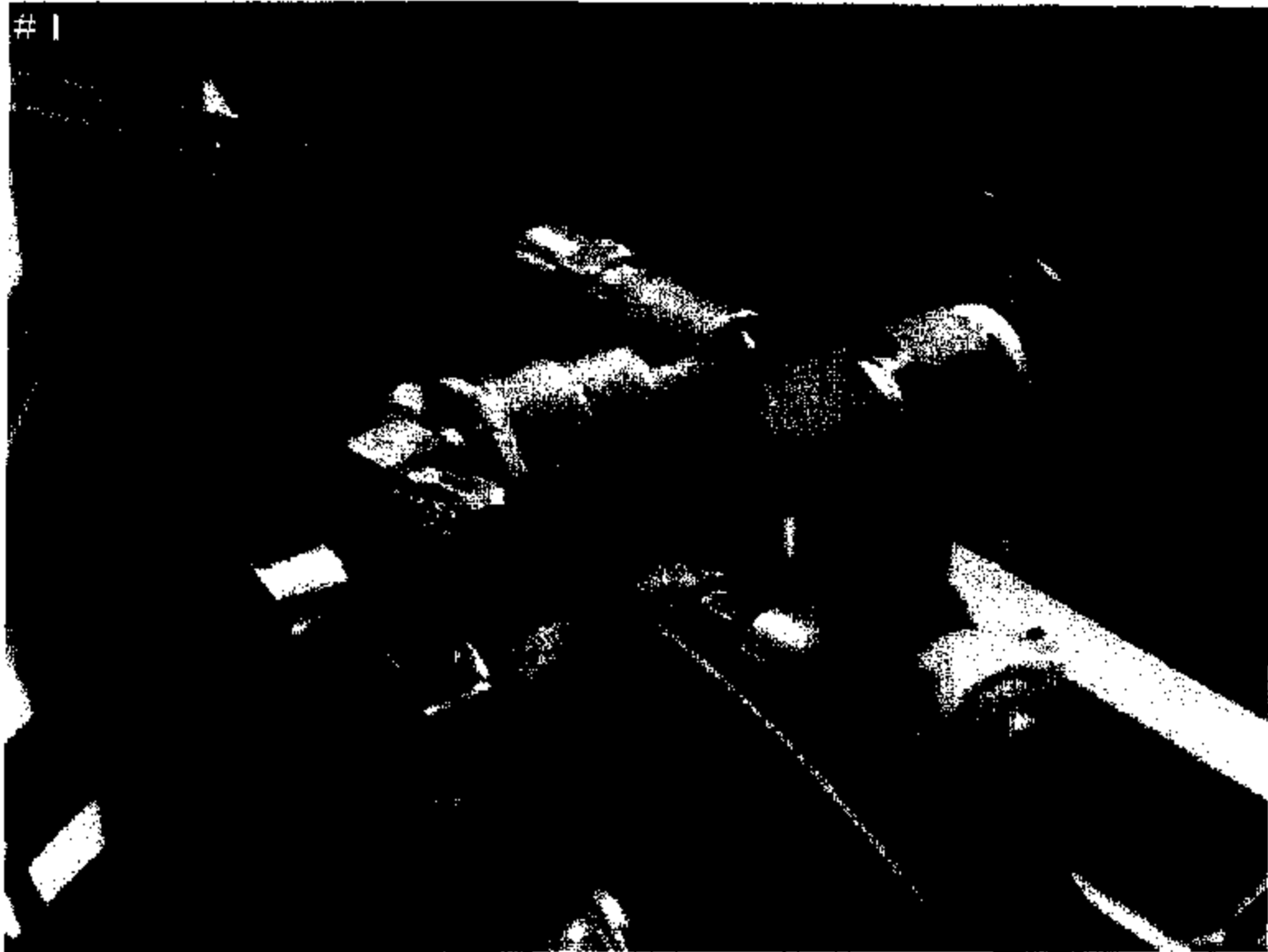


How to service the anti-compounding check valve in our 110500 and 110700.

CAUTION: Exhaust air pressure in the supply line, apply parking brakes.

- Remove control line (blue) - Picture #1, #2
- If insert stays in the fitting remove insert - Picture #2
- Hold cont. brass cap with wench, remove control line fitting - Picture #3
- Remove cont. brass cap - Picture #4
- Install new cont. brass cap, torque the cap to 8-8 ft. lbs. - Picture #5
- Install control line fitting - Picture #6
- Install control line (blue) - **CAUTION: Be sure insert is in control line, see Picture #2**

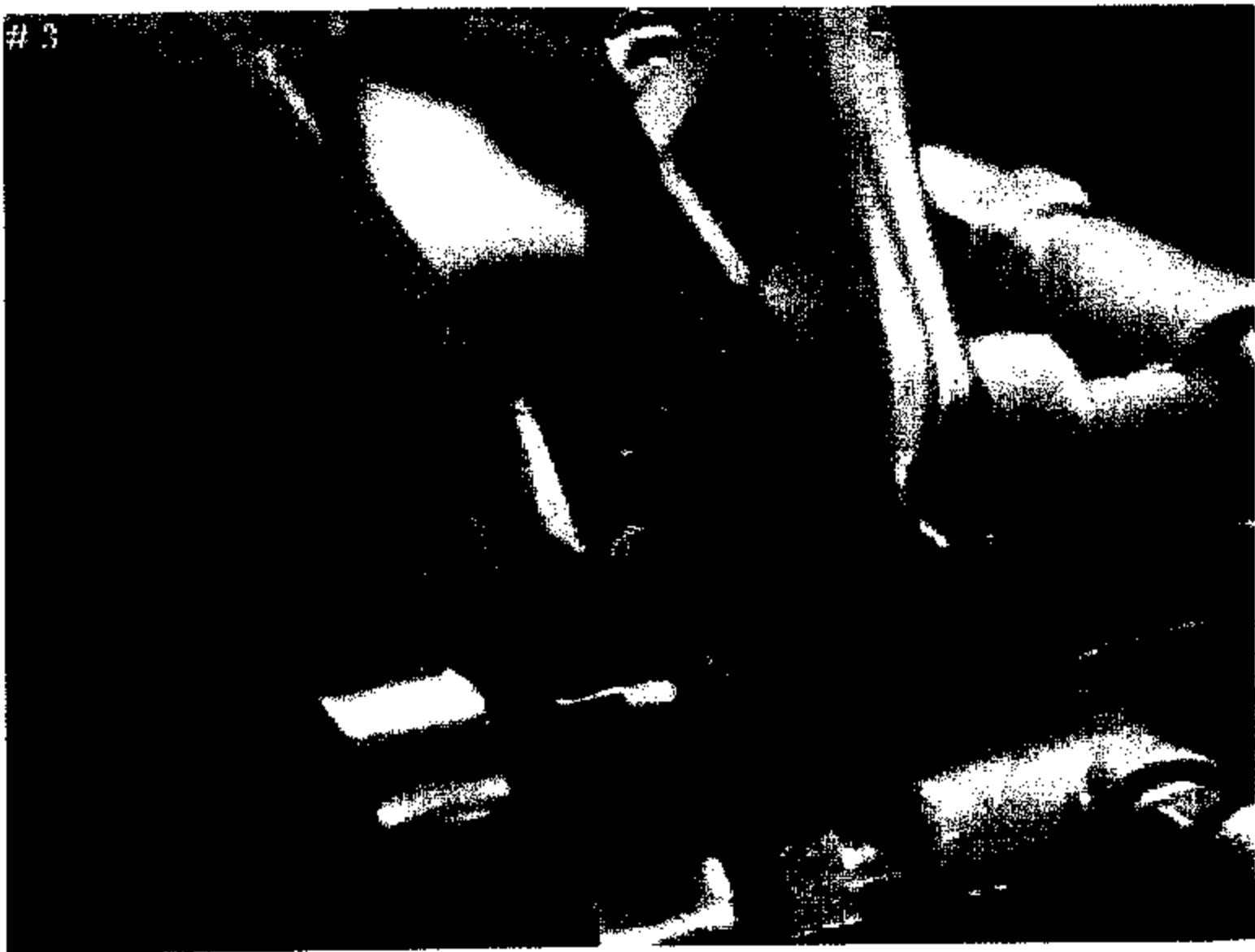
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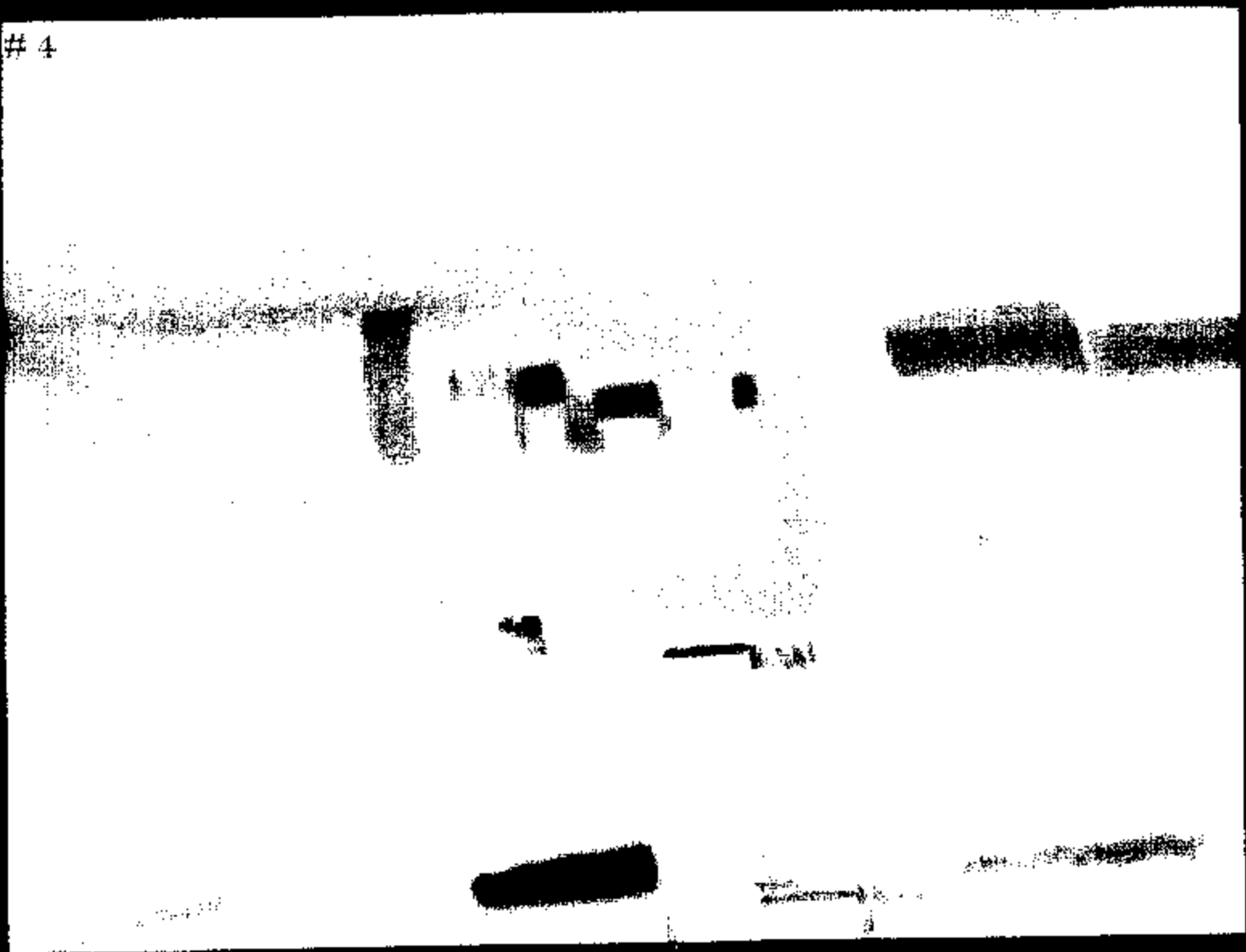
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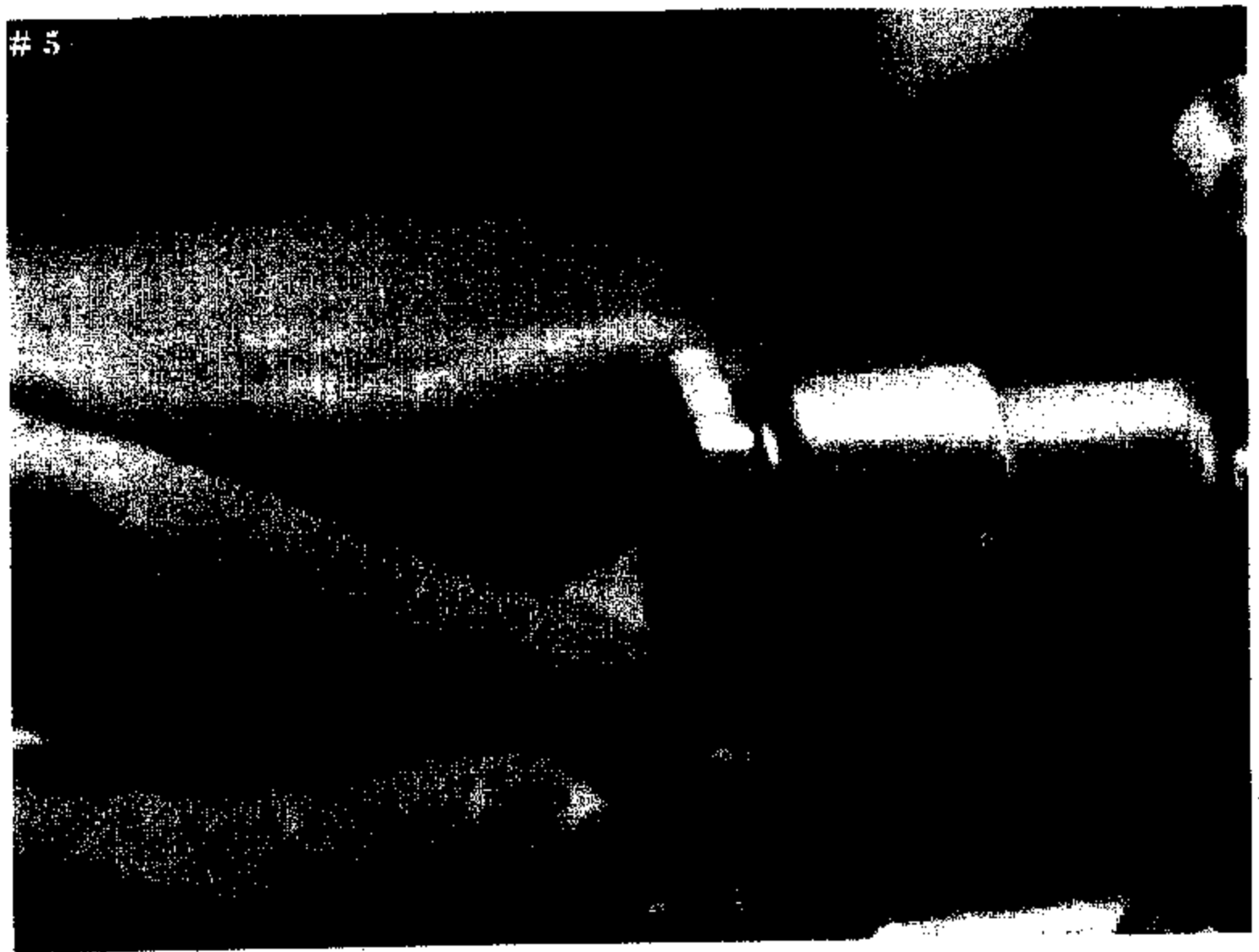
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