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OFFICE OF
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June 18, 2004

BY FACSIMILE AND U.S. MAIL

04V-292

George H. Person
Chief, Recall Management Division
National Highway Traffic Safety
Administration
Office of Defects Investigation
400 Seventh Street, SW
Washington, D.C. 20590

Re: Ox Bodies, Inc.

Dear Mr. Person:

Thank you for meeting with me on June 15, 2004, to discuss two recent incidents involving dump trucks manufactured in two stages by Ox Bodies, Inc. ("Ox" or the "Company"), which this firm represents, and Kenworth Truck Company ("Kenworth"). The dump trucks in question (VIN# 1NKDXBTX04J397725 and 1NKDXBTX04J397726) (the "Subject Vehicles") are part of a 321¹-unit vehicle population (the "Vehicle Population") completed by Ox from January 12, 2001, through May 14, 2004, that is comprised of vehicles that include (i) a Kenworth T800 or W900 chassis outfitted with a lift-axle installed by Kenworth at its factory, and (ii) a dump body manufactured by Ox and installed by Ox at its manufacturing facilities.

During the week of May 10, 2004, in two separate incidents, the lift-axle on each of the Subject Vehicles detached from the chassis on which the axles had been mounted. Neither incident involved injury to or death of persons. In both cases, the Subject Vehicle was damaged.

¹ Of the 321 vehicles in the Vehicle Population, six were modified as described on page 3 of this letter prior to delivery to the end-user.

Kenworth has taken the position that the incidents involving the Subject Vehicles were caused by certain installation practices of Ox when Ox mounted the dump bodies on those trucks. In connection with the installation of a dump body, Ox installs a hydraulic cylinder and oil reservoir on the top of the chassis frame immediately behind the cab. Normally, Ox would bolt a bracket for the hydraulic cylinder and oil reservoir above the axle bracket that secures the lift-axle to the chassis frame. However, the 9-inch axle bracket installed by Kenworth on the frame did not leave sufficient room for Ox to install bolts for its mounting bracket above the axle bracket. To address this lack of space, the Company removed two bolts from the axle bracket, fabricated a 3/8 inch plate with pre-drilled holes, placed the fabricated bracket over the Kenworth-installed bracket, and aligned the pre-drilled holes with the holes in Kenworth's bracket. Ox then inserted longer grade 8 (stover type) bolts through the holes in the plate, the axle bracket and the chassis frame and tightened the bolts. The Company welded an angle mount to the new bracket and installed the hydraulic cylinder and oil reservoir on the mount.

Since learning of the incident involving the Subject Vehicles, Ox and the truck dealer that sold the completed vehicles to the end-users, Kenworth of Birmingham (the "Dealer"), have inspected approximately 20 trucks from the Vehicle Population. These inspections, along with discussions with the vehicle owners, have revealed the following: (i) on most of the inspected vehicles, one or more of the bolts on the six-bolt axle bracket was torqued to less than the 150-ft./lb. minimum recommended by the lift-axle manufacturer, Watson & Chalin Manufacturing Inc. ("W&C"), (ii) the bolts torqued to less than the 150-ft./lb. minimum recommended by W&C included some replacement bolts installed by Ox and some original bolts installed by Kenworth that were not affected by Ox's installation, (iii) despite the fact that one or more of the bolts on the six-bolt axle bracket were torqued to less than the 150-ft./lb. minimum recommended by W&C, none of the lift-axes were loose, and (iv) despite the clear instructions and warnings in the W&C AL Series Rigid Axle Lift Suspension Installation and Operation Manual ("W&C Manual"), a copy of which was in each truck in the Vehicle Population when the completed truck was received delivered by Ox to the Dealer, it appears that none of the owners of the 20 vehicles that were inspected had ever retorqued the lift-axle bracket bolts.

Although Kenworth apparently has concluded that the axle failures on the Subject Vehicles were caused by Ox's installation of its mounting brackets over the axle brackets installed by Kenworth, Ox does not believe that this is correct for several reasons. *First*, Ox is aware of only two failures in the Vehicle Population, which includes 320 units produced over a 40-month period. Ox has used the installation methodology described above since January 12, 2001 – 27 months prior to Ox's completion of the Subject Vehicles in April 2003 – and to the Company's knowledge there have been no axle failures in the Vehicle Population other than on the Subject Vehicles. In 2001, Ox completed 54 vehicles in the Vehicle Population; in 2002, Ox completed 76 vehicles in the Vehicle Population. Many of these vehicles have been in service for more than 100,000 miles and no incidents have been reported to the Company. This strongly suggests that the Ox installation methodology is not the cause of a recurring problem.

Second, the Company does not know what type of service the Subject Vehicles had been in, including whether those vehicles had suffered any structural damage. Moreover, the Company does not know if there were structural defects in any of the components (brackets, bolts, etc.) installed by Kenworth, or if Kenworth's manufacturing process was problematic in any way.² Kenworth has not presented Ox with any test data or engineering studies to support its anecdotal theory that the axles on the Subject Vehicles failed as a result of Ox's installation practices. In the absence of such data or studies, Ox has no basis for concluding that there is any causal link between the axle failures and the Company's work.

Third, some end-users apparently are not heeding the warning in the W&C Manual to retorque the bolts on the lift-axle brackets on a regular basis. W&C directs that the bolts be retorqued after five days of service, 30 days of service, 60 days of service and every six months thereafter. Failure to follow this simple maintenance procedure could increase the likelihood of axle failure. In light of the fact that the inspections by Ox and the Dealer revealed both the evidence of some loose bolts and a failure by end-users to retorque bolts as specified in the W&C Manual, the Company questions whether the axle failures on the Subject Vehicles may have been the result, in whole or in part, of failure of the owners to maintain the trucks in accordance with the manufacturer's instructions.

Finally, the Company's installation methodology has been reviewed by W&C. W&C has advised Ox that it does not believe the axle failures were caused by the removal and replacement of bolts in the lift-axle brackets by the Company.³

Notwithstanding the Company's belief that the axle failures on the Subject Vehicles are unrelated to the Company's installation practices, in order to address the concerns of Kenworth and Kenworth of Birmingham, the Company has decided voluntarily to commence a customer satisfaction campaign with respect to the trucks in the Vehicle Population. As set forth in the draft letter attached hereto as Appendix A, the Company will contact the owners of trucks in the Vehicle Population and advise them (i) there have been two incidents of axle failure in dump trucks completed by Ox from January 12, 2001, through May 14, 2004, on Kenworth T800 and W900 truck chassis outfitted with a factory installed lift-axle, and (ii) at no charge to the owner, Ox will restore the lift-axle brackets to their original configuration and retorque all bolts on the lift-axle brackets. In addition, the Company will advise owners that they must follow the instructions in the W&C Manual regarding periodic retorquing of bolts after five days of service,

² In this regard, the Company notes that the Subject Vehicles have consecutive VIN numbers. The fact that the two trucks, which were owned by different end-users, failed within three days of one another, raises the question of whether there was some quality control or other failure in the chassis manufacturing process. Ox performed its installation on these vehicles a week apart, and completed several other trucks in the interim.

³ To the Company's knowledge, W&C has not conducted any tests or engineering studies in connection with its review of these incidents.

30 days of service, 60 days of service and every six months thereafter, and provide owners with copies of the relevant pages from the W&C Manual.

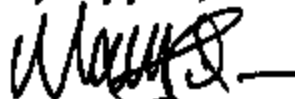
As of May 17, 2004, the Company has modified its installation methodology such that it no longer removes and replaces bolts from the Kenworth-installed lift-axle brackets. In addition, since May 17, 2004, the Company has restored the original lift-axle bracket configuration and retorqued the lift-axle bracket bolts, on 15 vehicles⁴ from the Vehicle Population, at no cost to the owners.

The Company has begun gathering the names of the owners of the trucks in the Vehicle Population. We expect to begin sending out notification letters on or about July 1, 2004. If your office has any questions or comments about the letters, please contact us as soon as possible.

Ox will submit quarterly reports regarding the progress of the campaign to NHTSA in a format consistent with the regulations at 49 C.F.R. § 573.6.

Thank you again for your assistance in this matter. Please feel free to contact us if you have any questions.

Very truly yours,



Mark H. Sidman

cc: By facsimile:

Lehman Pendley
President, Ox Bodies, Inc.

Eric P. Ebenstein, Esq.
Office of Chief Counsel, NHTSA

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⁴ Of these 15 vehicles, six were modified prior to delivery to the end-user.

[OX BODIES, INC. LETTERHEAD]

[Date]

[Owner Address]

Dear [Owner]:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Ox Bodies, Inc. ("Ox") has decided that a defect that relates to motor vehicle safety exists in dump trucks comprised of an Ox dump body mounted from January 12, 2001, through May 14, 2004, on a Kenworth Truck Company ("Kenworth") T800 or W900 chassis outfitted with a factory installed rigid lift-axle. This decision by Ox is based solely on a determination made by Kenworth, the manufacturer of the chassis incorporated into the vehicles in question, and communicated to Ox as the final-stage manufacturer of these vehicles.

Ox has learned that, in two recent instances, the lift-axle detached from a dump truck comprised of a Ox dump body mounted from January 12, 2001, through May 14, 2004, on a Kenworth T800 or W900 chassis outfitted with a factory installed lift-axle. Our records show that you purchased a vehicle that is part of this vehicle population.

Description: When Ox installed the dump body on your vehicle, it removed two bolts from the axle brackets for the lift-axle installed by Kenworth. Ox installed its own mounting brackets over the factory-installed axle brackets and replaced the bolts with longer bolts. In inspections of certain of the trucks in the vehicle population, Ox has found that, on most vehicles, one or more of the six bolts that affix each lift-axle bracket were torqued to less than the minimum 150 ft./lbs. recommended by the lift-axle manufacturer, Watson & Chalin Manufacturing Inc. Ox believes that certain owners of the subject trucks have failed to re-torque the bolts securing the lift-axle brackets in accordance with the warning and directions set forth in the Watson & Chalin Manufacturing AL Series Rigid Lift Axle Suspension Installation and Operation Manual. It is unclear if the presence of loose bolts on the subject trucks is the result (in whole or in part) of Ox's replacement of bolts in connection with its body mounting operations, or is the result (in whole or in part) of failure by owners to re-torque bolts in accordance with the lift-axle manufacturer's instructions, or both.

Remedy: At no charge to you, Ox will remove and relocate the mounting brackets it had installed over the factory-installed lift-axle brackets, and replace the two bolts it had installed with bolts substantially identical to the bolts originally installed by Kenworth. Ox will re-torque all six of the bolts on each lift-axle bracket to between 150 and 200 ft./lbs., as recommended by Watson & Chalin Manufacturing Co. If you have made these modifications prior to receipt of this letter, Ox will reimburse you for the cost of such modifications.

What You Need to Do: To schedule the cost-free modification, please contact the Ox Bodies, Inc. facilities in Fayette, Alabama (205/932-5720), Nashville, Arkansas (870/451-9021) or Bennettsville, South Carolina (803/479-0255), or contact Kenworth of Birmingham in Birmingham, Alabama (205/326-6170), Kenworth of Montgomery in Montgomery, Alabama (334/263-3101), Kenworth of Dothan, Inc. in Dothan, Alabama (334/712-4900) or Kenworth of Mobile, Inc. in Mobile, Alabama (251/478-3900).

If it not feasible for you to bring your vehicle to one of these facilities, you may call us at 205/932-5720 to make alternative arrangements for a cost-free repair.

Service Problem Help: If our service departments or those of Kenworth of Birmingham, Kenworth of Montgomery, Kenworth of Dothan, Inc. or Kenworth of Mobile, Inc. are unable to provide you with assistance to complete the modification, free of charge, within a reasonable time, please call or write to our main office at the above address. If Ox fails or is unable to perform the modifications within 60 days, you may submit a complaint to the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, SW, Washington, D.C. 20590 or call the toll free Auto Safety Hotline at 800-424-9393 (Washington, D.C. area residents may call 202-366-0123).

Service Advisory: In the Watson & Chalin Manufacturing Inc. AL Series Rigid Lift Suspension Installation and Operation Manual, which you should have received from your truck dealer when the truck was purchased, owners are directed and warned to re-torque the bolts on the lift-axle brackets after five days of service, 30 days of service, 60 days of service and every six months thereafter. We have included with this letter the relevant pages of the Watson & Chalin Manual.

Thank you for using Ox Bodies, Inc. dump bodies. If you have any questions, please free to call us at (205) 932-5720.

Very truly yours,

Lehman Pendley
President