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June 29, 2004

BY FACSIMILE AND U.S. MAIL

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

Re: Ox Bodies, Inc.
Recall No. 04V-292

RECEIVED
NHTSA-215
JUL -7 A 9:26
OFFICE OF
DEFECTS INVESTIGATION

Dear Mr. Person:

Per our telephone conversation yesterday, please be advised that the vehicle population of the dump trucks that are the subject of our letter to you, dated June 18, 2004, is 279 vehicles rather than 321 vehicles identified in that letter. This revised number reflects duplications in the original list and the inadvertent inclusion of certain vehicles that turned out not to be configured as originally thought.

We have received from your office an Acknowledgment Fax Sheet of Receipt of Defect Information Report Submitted Under 49 CFR Part 573 (the "Acknowledgment"). The Acknowledgment requests that we make three modifications to draft owner notification letter we sent to you on June 23, 2004. As indicated on the attached, revised draft, Ox will make the requested changes.

As we discussed yesterday, the "Subject" line of the Acknowledgment does not accurately reflect the facts presented in our letter to you, dated June 18, 2004, or the revision to the vehicle population size set forth above. We request that the "Subject" be revised as follows:

279 Ox Bodies 2001-2004 dump trucks built on Kenworth K800 or W900 chassis and outfitted with a factory installed rigid lift-axle. The lift-axle could detach from the dump truck. One or more of the six bolts that affix each lift-axle bracket

Mr. George H. Person

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June 29, 2004

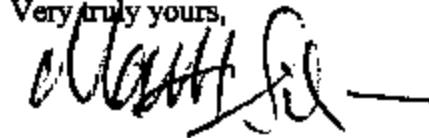
may not be tightened to the minimum specifications established by the lift-axle manufacturer.

Please let us know if the above language is acceptable to NHTSA. If so, we would appreciate it if the Acknowledgment could be revised and re-issued.

Ox intends to begin sending out the owner notification letters, as revised, on July 1, 2004.

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mark H. Sidman", with a horizontal line extending to the right.

Mark H. Sidman

Enclosure

cc: Lehman Pendley (by facsimile)
President Ox Bodies, Inc.

Eric P. Ebenstein, Esq. (by email)
Office of Chief Counsel, NHTSA

Patricia Wallace (by email)
Safety Defects Analyst, NHTSA

[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 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 one of these dump trucks.

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 retorque 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 888-327-4236.

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 retorque 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