



1313 S. Stockton Street  
Lodi, CA 95240  
(209) 368-8881 ext 201

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OSE-062  
(6 pgs.)

2005 SEP 30 A 11: 22

OFFICE OF  
DEFECTS INVESTIGATION September 29, 2005

VIA FACSIMILE AND U.S. MAIL

Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Office of Defects Investigation  
400 7<sup>th</sup> Street, SW  
Washington, D.C. 20590

Re: Part 573 Report

Dear Associate Administrator:

Enclosed is the Part 573 Defect and Noncompliance Report for 2005 Nissan Xterra trailer hitches. Please file and process in your usual manner.

Very truly yours,  
Valley Industries, LLC

Bryan Fletcher  
President

Enclosure

**Safety Defect and Noncompliance Report Guide for Equipment**  
**PART 573 Defect and Noncompliance Report**

On September 22, 2005, Valley Industries, LLC decided that a defect which relates to motor vehicle safety exits in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: September 28, 2005

Furnish the manufacturer's identification code for this recall (if applicable): Not applicable

1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Valley Industries, LLC  
32501 Dequindre Rd  
Madison Heights, MI 48071

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Bryan Fletcher  
President

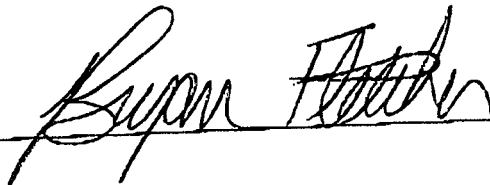
Telephone Number: (248) 588-6900

Fax No.: (248) 588-0027

Name and Title of Person who prepared this report.

Bryan Fletcher  
President, Valley Industries, LLC

Signed: \_\_\_\_\_



## I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:

Generic name of the item:

Trailer hitch.

Make: Hitch-Class III Receiver

Model: 2005 Nissan Xterra

Part Number: 82850

Function:

The hitch attaches to a motor vehicle to facilitate trailer tow within rated capacities.

Other information which characterizes/distinguishes the items of equipment to be recalled:  
The subject hitches are identifiable by part number label at the end of the frame brackets.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996, through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period. Unknown.

## II. Identifying the Recall Population

3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.

Based on Customer Shipment documentation, Valley Industries believes that there are 498 items that were shipped as replacement parts.

Total Number Potentially Affected by the Recall:

498 units

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance: Unknown at this time.

Identify and describe how the recall population was determined--in particular how the recalled

models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:

The recall population was determined based on manufacturing dates for the particular part number sold as replacement equipment. It is believed that these hitches were manufactured between March, 2005 and September, 2005.

### **III. Describe the Defect or Noncompliance**

**5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.**

Under certain circumstances, the hitches may break while in use.

**Describe the cause(s) of the defect or noncompliance condition.**

Insufficient weld strength of the hitch.

**Describe the consequence(s) of the defect or noncompliance condition.**

The trailer or item in tow may release partially or wholly from the motor vehicle.

**Identify any warning which can (a) precede or (b) occur.**

Unknown.

**If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.**

Not applicable.

**Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:**

Not applicable.

### **IV. Provide the Chronology in Determining the Defect/Noncompliance**

*If the recall is for a defect, complete item 6, otherwise item 7.*

**6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.**

September 6, 2005: Valley Industries received a warranty claim on a 2005 Nissan Xterra trailer hitch where the center section separated from the vehicle while in the towing process. An initial investigation as to the

cause of the breakage was commenced. No accidents, injuries or deaths have been reported to Valley Industries.

September 6, 2005 through September 12, 2005: Valley Industries performed weld, strength and durability testing on the Xterra hitches.

September 12, 2005: Valley Industries stops shipment and contains the inventory of 2005 Xterra hitches pending resolution of the investigation. Notifications are sent to all customers requesting a containment of current inventory.

September 12, 2005 through September 22, 2005: Internal testing of the all Xterra hitches is performed. Valley Industries requests outside assistance in the form of weld experts, metallurgists and suppliers for root cause identification.

September 22, 2005: Analysis of the results of the internal testing. Valley Industries schedules additional testing, such as heat effect and Robotic Weld Cell, for completion by September 30, 2005.

**7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.**

Not applicable.

#### **V. Identify the Remedy**

**8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.**

The recall condition is insufficient weld; the remedy is to replace with hitches that contain a new, suitable weld pattern.

**Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.**

The replacement hitches will be of sufficient weld quality and durability.

**Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.**

The hitches that are the subject of the recall have been discontinued.

## VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Valley Industries will provide recall notification to the consumers for replacement hitches within the next two (2) weeks. It is anticipated that replacement hitches will be available on an ongoing basis, with completion of replacement hitches for the recall population within sixty (60) days.

## VII. Furnish Recall Communications

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

Note: These documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

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