05V-350

(11 pages)

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Responsibility and Reports[1]

On APRIL 20 **, 2005,** RFD COMPONENTS **[MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No.** _____**) exits in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.**

Date this report was prepared: AUGUST 1 2005

Furnish the manufacturer's identification code for this recall (if applicable): _____

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

NOVAE CORP.

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

MARK KUNDO MATERIALS MANAGER

Telephone Number: 260-758-9838 **Fax No.:** 260-758-9839

Name and Title of Person who prepared this report.

MARK KUNDO
MATERIALS MANAGER

Signed:

Mark Kundo

[1] Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210 or by FAX at (202) 366-7882.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, ***for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:***

Make(s): SURE-TRAC **Model Years Involved:** 2005 **Model(s):** ST6208TA-B-035, ST6210HSA, ST6210TA, ST8212TA, ST8212HSA

Production Dates: Beginning: 2-14-05 **Ending:** 3-8-05

VIN Range: Beginning: #4606 **Ending:** #4724

Vehicle Type: TRAILER **Bodystyle:** UTILITY TRAILER

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:
ONLY UNITS EQUIPED WITH A WHEEL THAT MATCHES THE STATED SIZE OF "ST205/75D15"

Make(s): SURE TRAC **Model Years Involved:** 2005 **Model(s):** ST8216TAT, ST8216UAT, ST8219CHS-B-070

Production Dates: Beginning: 2-23-05 **Ending:** 3-10-05

VIN Range: Beginning: #4654 **Ending:** #4773

Vehicle Type: TRAILER **Bodystyle:** UTILITY TRAILER

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:
ONLY UNITS EQUIPED WITH A WHEEL THAT MATCHES THE STATED SIZE OF "ST205/75D15"

Make(s): SURE-TRAC **Model Years Involved:** 2005 **Model(s):** ST7812LS, ST7814LST

Production Dates: Beginning: 2-18-05 **Ending:** 2-18-05

VIN Range: Beginning: #4631 **Ending:** # 4636

Vehicle Type: TRAILER **Bodystyle:** UTILITY TRAILER

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:
ONLY UNITS EQUIPED WITH A WHEEL THAT MATCHES THE STATED SIZE OF "ST205/75D15"

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.

II. Identify the Recall Population

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

Vehicles Model Involved	Year 2005	Number of Potentially 26
ST6210TA		ST8216TAT
ST6208TA-B-035		ST8216UAT
ST6210HSA		ST8219CHS-B-070
ST7812LS		
ST7814LST		
ST8212TA		
ST8212HSA		

Total Number Potentially Affected by the Recall: 26

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

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 vehicles:

IT is not possible to calculate the persentage of Vehicles which could actually contain a defective wheel. RFD is aware of only five defects out of a total of 2100 wheels Novae recieved only 24 wheels.
OUR LIST was compiled by using the ship date from RFD of 2-25-05 of 24 wheels and the ~~d~~date notified of April 20 2005 As an End date ~~Co~~ Dealer orders were reviewed to identify possible models that used that size of wheel. Unit VINS were identified by the invoice number assigned to the dealer order during that time frame. An inventory was conducted at Novae on April 20 2005 to verify we had no ~~tires~~ wheels that ~~were~~ were stamped accordins to the Letter from RFD on April 20, 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.**
The wheel is failing due to a defective weld. It consists of two parts. The center is a disk to which the rim holding the tire is welded. Pictures of the fust defective wheel are in the Progressive Engineering Inc. report.

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

The weld was inspected and found that a gap exists between the weld bead and rim surface.

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

the weld can break causing the rim to detach from the disk.

Identify any warning which can (a) precede or (b) occur.
possible loose connection between disk and rim.

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

RFD Components
516 Pine Creek Court
Elkhart, IN 46515

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

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.

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.

SEE ATTACHED LETTERS FROM RFD COMPONENTS AND PROGRESSIVE ENGINEERING, INC.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

RFD Components is Contacting all dealers that received units that potentially contained a wheel from this batch.

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

MANUFACTURE WILL SUPPLY REPLACEMENT WHEELS FOR THOSE MATCHING THE DESCRIBED INDENTIFYING STAMPINGS

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

N/A, NO TIRES WERE DEFECTIVE.

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.

Upon recieving the letter from RFD on April 20, 2005 full inspection of our wheel inventory was made finding none of the wheels with the markings described in the letter of April 20 2005.

VI. Identify the Recall Schedule

10. 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.

~~We~~ We notified RFD on April 27, 2005 requesting that they will conduct the recall.

VII. Furnish Recall Communications

11. 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 that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

Warrick
Boyn, LLP
ATTORNEYS AT LAW

Admitted in Indiana and Michigan

Thomas E. Warrick*
Gary D. Boyn
James V. Woodsmall
Cynthia S Gillard
Randall G. Hesser
Timothy S. Shelly
William D. Haut
Dean E. Lazenby
William L. Law, III**

*Admitted in Illinois, not admitted in Michigan

**Admitted in Indiana, not admitted in Michigan

April 5, 2005

RECEIVED
05-215

2005 APR 15 A 11:45

OFFICE OF DEFECTS INVESTIGATION

05E-031 (8pgs.

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

RE: RFD Components, Inc. Defect Report

Dear Sir:

I represent RFD Components, Inc. ("RFD")which is hereby notifying you of a defect in a wheel assembly. Each of the information set out below corresponds with 49 CFR Part 573.6(c).

1. The reporting entity is RFD Components, Inc., 516 Pine Creek Court, Elkhart, Indiana 46516, telephone number: (574) 295-3939. The contact name is Paul Minne, President.

2. Five defective wheels were reported to RFD. All five of the defective wheels were stamped with the date 01-01-05. These wheels were manufactured on the stamped date. RFD only received one container of these wheels. All of our other wheels from this manufacturer were received prior to the stamped date and we have not received any shipments of wheels since then. The wheels were part of one container containing 2,100 wheels. These wheels were sold by RFD from February 10, 2005 through March 10, 2005. The wheels have two RFD part numbers depending upon the type of tire mounted on the wheel. The wheels with the radial tire have RFD part number AY-130. The ones with a bias ply tire mounted on them have an RFD part number AB-125. All of the wheels at issue were manufactured on 01-01-05, which is the date stamped on the wheel.

The wheels were purchased from Eastwest United Group, Inc., P. O. Box 9205, 2025 Mountain View Road, South, El Monte, California 91733, telephone: (626) 401-1048, fax: (626) 401-0352. The wheels were manufactured by Jingu Auto Components, Zhejiang Jingu Automobile Components Manufacturing Company, Ltd., No. 28, FengShou Road, Fuyang, Zhejiang, China 311400, telephone: 86-571-63133918; fax: 86-571-63133950.

121 West Franklin Street
Suite 400
Elkhart, Indiana 46516-3278
574/294-7491
Fax: 574/294-7284
thefirm@warrickandboyn.com

The wheels at issue were purchased by the following companies:

Axis Products, Inc.
P. O. Box 1083
Elkhart, IN 46515-1083

Buckeye Trailers, Inc.
2620 State Route 18 N.
Republic, OH 44867

Crossroads RV
1115 W. Lake St.
Topeka, IN 46571

Dutchmen Manufacturing, Inc.
2164 Caragana Court
Goshen, IN 46526

Forest River
P. O. Box 3030
Elkhart, IN 46515-3030

John H. Enterprise, Inc.
21066 Protecta Drive
Elkhart, IN 46516

Novae Corp.
One Novae Parkway
Markle, IN 46770

Stigers Trailers Sales
2130 Commercial Drive
Frankfort, KY 40601

Trail-Rite, LLC
1010 New York Avenue
Toledo, OH 43611

3. Each of the vehicles usually contain four wheels and a spare. Out of the total of 2,100 wheels, approximately 473 wheels were recovered by RFD before they were installed on any vehicles. If five wheels were installed on each vehicle, there are approximately 325 vehicles manufactured with the possible defective wheel. It is not possible at this time to break it down between the types of trailers.

4. It is not possible to calculate the percentage of vehicles which could actually contain a defective wheel. We are only aware of five defects out of a total 2,100 wheels.

5. The wheel is failing due to a defective weld. It consists of two parts. The center is a disk to which the rim holding the tire is welded. Pictures of the first defective wheel are in the Progressive Engineering, Inc. report.

6. Approximately one month ago, RFD was contacted by Dutchmen Manufacturing, Inc., 305 Steury Avenue, Goshen, Indiana 46528 that one of our wheels had failed. This was the first incident reported to RFD. Then on March 30, 2005, the same company notified RFD that four more wheels had

failed. The first wheel was visually inspected by Progressive Engineering, Inc. They indicated that there was a gap between the weld bead and the rim surface with limited connection of the weld to the rim. No warranty claims or other reports were received concerning these wheels.

7. The Progressive Engineering report on the first wheel was dated March 23, 2005. A copy is enclosed. See item 6 for the conclusion.

8. RFD will notify the trailer manufacturers. RFD will send a set of new wheels to each dealer or purchaser of a unit containing wheels stamped 01-01-05. The dealer or purchaser will be directed to take their trailer to a retail tire dealer capable of removing the wheels, dismounting the tires and reinstalling the tires on a new wheel and installing the new wheel on the trailer. RFD will pay the cost of removing and replacing the tires and wheels. RFD estimates it will notify its trailer manufacturer customers of the safety related defect and remedy on April 6, 2005 and estimates a completion date of April 12, 2005.

9. Not applicable since no tires are defective.

10. A representative copy of the notice to the trailer manufacturers will be forwarded to NHTSA.

12. RFD will use the NHTSA identification number and will not have a separate campaign number.

Sincerely,

James V. Woodsmall

JVW/jw

Enclosures

SENT VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Progressive Engineering Inc.

3/23/2005
RFD Components
516 Pine Creek Court
Elkhart, IN 46515

Subject: **Rim Failure Analysis**

To Whom It May Concern:

After visually inspecting the failed 15 x 5, 5 on 4.5", white spoked rim that was dropped off 3/21/2005, I have noted the following list of observations. *The visual observations are the opinion of Jason Holdeman of Progressive Engineering, Inc. and have not been substantiated by any testing or other analysis method.*

1. The rim side of the weld shows almost NO penetration. The weld does show the expected penetration into the insert due to the weld bead's outline on the insert.
2. A wire wheel was used to remove the paint on both sides of the rim at a weld location and NO discoloration was found on the rim (either side) that is typically seen in the heat affected zone.
3. After removing the paint and scale from the rim at a failed weld location, using a wire wheel, the resulting surface was smooth to the touch. A few shallow pits were noted at the outer edge of weld. Surface roughness on the rim was limited to weld splatter.
4. The failed contact areas on the rim had paint on them. The same was found on the welds that were still connected to the insert. This would indicate that there was a gap between the weld bead and the rim surface that was large enough to allow paint to migrate in.

In conclusion, the welds appear to be localized to the rim insert with very limited connection to the rim. The attached pictures show some of the noted observations mentioned above. Please feel free to contact me at 574-533-0337 ext. 144 or via e-mail at jholdeman@p-e-i.com

Sincerely,

Jason Holdeman

Jason R. Holdeman
Laboratory Manager

58640 State Road 15 Goshen IN 46526
Phone: 574.533.0337 Fax: 574.533.2786
www.p-e-i.com