

Cottrell, Inc.

November 16, 2005

**VIA FACSIMILE &
FEDERAL EXPRESS**

Associate Administrator for Safety Assurance (NSA-01)
National Highway Traffic Safety Administration
Attn: Ms. Pat Wallace
400 7th Street, SW
Washington, DC 20590

05V-534
(8 Pages)

Re: Recall of Cottrell C-9ENC

Dear Ms. Wallace:

Please find enclosed Cottrell's Part 573 Defect Report related to the recall of Cottrell C-9ENC enclosed car-haul trailers. I understand from our prior dealings with NHTSA that when we have unique circumstances such as these (limited number of units that are easily traceable to a small number of customers with whom we were in immediate contact), no "official" owner notification is necessary. As a result, we are not submitting a draft owner notification letter or draft notification envelope with our 573 Report. I also understand that this recall will not be included in the monthly recall news release, so we are not submitting a request for exemption, as we would otherwise do.

If I am mistaken in any way, or if I am misunderstanding our obligations with respect to this recall, please let me know and I will do whatever is necessary to rectify that situation immediately.

As you can see, we have already reworked the vast majority of the 38 units at issue, and only 2 remain in need of repair. We will provide you with an update when the remaining 2 units are complete so that you can close your file on this recall.

In the interim, please do not hesitate to call me with any questions you might have. Thank you very much for your assistance.

Sincerely,

Melanie Stone

Melanie S. Stone



2125 Candler Road

Gainesville, GA 30507

(770) 532-7251 Ext. 285

(770) 532-2294 Direct Fax

www.cottrelltrailers.com

Encls.

PART 573 Defect and Noncompliance Reporting

Defect Report

Report Date: November 16, 2005

1. Vehicles affected are manufactured by:

Cottrell, Inc.
2125 Candler Road
Gainesville, GA 30507

2. The following vehicles are being recalled:

All Cottrell C-9ENC enclosed car-haul trailers manufactured from August 2003 (initial start of production for such units) through November 2005 (last such unit produced and placed into the stream of commerce). A repair list of VIN numbers by customer name is attached. Three customers and 38 units are impacted.

3. The total number of vehicles subject to recall:

38

4. The approximate percentage of vehicles from #3 above estimated to actually be affected:

Cottrell plans to rework 100% of the subject units manufactured, and has already reworked 35 of 38 affected units, with only 2 units remaining for rework. See attached listing of repairs by VIN. (Note: Unit #9 on the attached listing was involved in an unrelated incident and was already out of service pending a decision by the insurance carrier as to whether or not the unit will be repaired or totaled. Cottrell has provided a quote for repair work to aid the insurance company in that determination. In the event the unit is to be repaired, Cottrell will perform the necessary rework at the time of repair.)

5. Description of the defect:

The subject vehicles are enclosed car-haul trailers that are equipped with roofs that raise and lower. The roofs are attached to a raising/lowering mechanism by brackets that are fastened to the roof. Investigation has shown that these brackets may experience high stresses during the process of seating the roof in the down position, and that the fasteners used to secure the roof to the brackets may not be able to withstand those stresses. Over time, the brackets could deform, and the fasteners may break under the stress. Should that occur, the roof might separate from the trailer. (See photographs below for a picture of the vehicle at issue and a close-up of one corner of the subject roof attachment site).

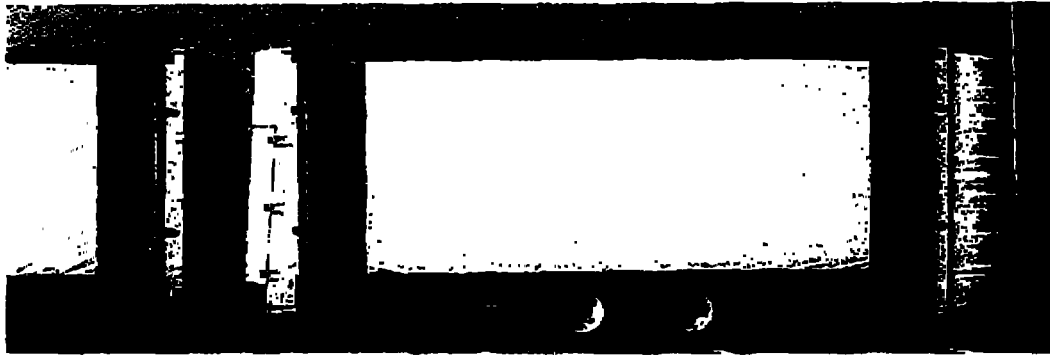


Figure 1: Overall picture of vehicle.



Figure 2: Close-up of one corner of the subject roof attachment site.

6. The following data is the basis for the determination to recall these vehicles:

- a. 11/07/05- Customer notified Cottrell that a roof had blown off a parked unit in high winds. Appeared to be an unusual and isolated incident.
- b. 11/09/05 – Customer notified Cottrell that a roof had blown off a unit in transit resulting in damage to a light pole. Immediately began inspection and analysis.
- c. 11/10/05 – Continued inspection, review and analysis of subject vehicles and like vehicles, and performed engineering analysis. Determined that a potential motor vehicle safety issue may exist, and that such vehicles should be recalled.
- d. 11/12/05 – Began rework of subject vehicles on site and in the field.

7. The remedy consists of 3 steps as follows:

- a. Install 4 additional 3/8" grade 8 bolts. These bolts clamp the original roof brackets and roof between a new bottom reinforcing plate and a new top reinforcement angle.
- b. Install an extra long pin through the side of the roof.
- c. Install a safety cable between the roof and the lift bracket.

Note: such repairs are performed on all 4 corners of the headramp and the trailer. See attached reinforcement installation drawing for more detailed information.

8. Notification:

Thirty-eight (38) units are at issue, with 36 of the 38 units belonging to one customer. Two other customers each have one unit affected. Once it was determined that a safety issue existed, Cottrell immediately contacted all three customers involved to recommend that the units at issue be taken out of service. Within two days of that determination, Cottrell began sending teams into the field to make the necessary repairs. As of the time of this notification to NHTSA, only two units remain in need of repair. (See attached list of repairs by VIN). We understand from our past experience with your office that no "official" owner notification letter is necessary under these circumstances.

9. Cottrell will use the identification number assigned by NHTSA for this recall.

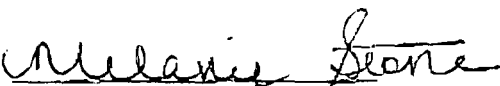
10. Questions regarding this recall should be directed to:

- a. Melanie Stone
Cottrell, Inc.
2125 Candler Road
Gainesville, GA 30507
(770) 532-7251, ext. 285

Or, if not available, then to:

- b. Bryan Howes
Cottrell, Inc.
2125 Candler Road
Gainesville, GA 30507
(770) 532-7251, ext. 258

Report Submitted by:


Melanie Stone, Cottrell, Inc.

#	Customer	Co#	VIN#	Date Repaired	
				HR	TRL
1	Allied Systems	n/a	5E0A114454G005146		
2	BMT	501	5E0A1144X56005967	11/11/05	11/11/05
3	BMT	502	5E0A114425G010001	11/14/05	11/14/05
4	BMT	503	5E0A114445G010002	11/12/05	11/12/05
5	BMT	504	5E0A114465G010003	11/13/05	11/13/05
6	BMT	505	5E0A114485G010004	11/12/05	11/12/05
7	BMT	506	5E0A1144X5G010005	11/13/05	11/13/05
8	BMT	507	5E0A114415G010006	11/13/05	11/13/05
9	BMT	508	5E0A114435G010007	* Out of Service	
10	BMT	509	5E0A114455G010008	11/15/05	11/15/05
11	BMT	510	5E0A114475G010009	11/15/05	11/15/05
12	BMT	511	5E0A114435G010010	11/12/05	11/12/05
13	BMT	512	5E0A114455G010011	11/12/05	11/12/05
14	BMT	513	5E0A114475G010012	11/14/05	11/14/05
15	BMT	514	5E0A114495G010013	11/14/05	11/14/05
16	BMT	515	5E0A114405G010014	11/14/05	11/14/05
17	BMT	516	5E0A114425G010015	11/13/05	11/13/05
18	BMT	517	5E0A114445G010016	11/15/05	11/15/05
19	BMT	518	5E0A114465G010017	11/12/05	11/12/05
20	BMT	519	5E0A114485G010018	11/14/05	11/14/05
21	BMT	520	5E0A1144X5G010019	11/13/05	11/13/05
22	BMT	521	5E0A114465G010020	11/15/05	11/15/05
23	BMT	522	5E0A114485G010021	11/15/05	11/15/05
24	BMT	523	5E0A1144X5G010022	11/14/05	11/14/05
25	BMT	524	5E0A114415G010023	11/14/05	11/14/05
26	BMT	525	5E0A114435G010024	11/12/05	11/12/05
27	BMT	526	5E0A114455G010025	11/12/05	11/12/05
28	BMT	527	5E0A114475G010026	11/14/05	11/14/05
29	BMT	528	5E0A114495G010027	11/14/05	11/14/05
30	BMT	529	5E0A114405G010028	11/13/05	11/13/05
31	BMT	530	5E0A114496G029601	11/12/05	11/12/05
32	BMT	531	5E0A114408G029602	11/15/05	11/15/05
33	BMT	532	5E0A114426G029603	11/15/05	11/15/05
34	BMT	533	5E0A114448G029604	11/12/05	11/12/05
35	BMT	534	5E0A114466G029605	11/12/05	11/12/05
36	BMT	535	5E0A114486G029606	11/12/05	11/12/05
37	BMT	536	5E0A1144X8G029607	11/12/05	11/12/05
38	DAS	n/a	5E0A114426G051701		

* Unit # 9 was already out of service due to previous unrelated incident.

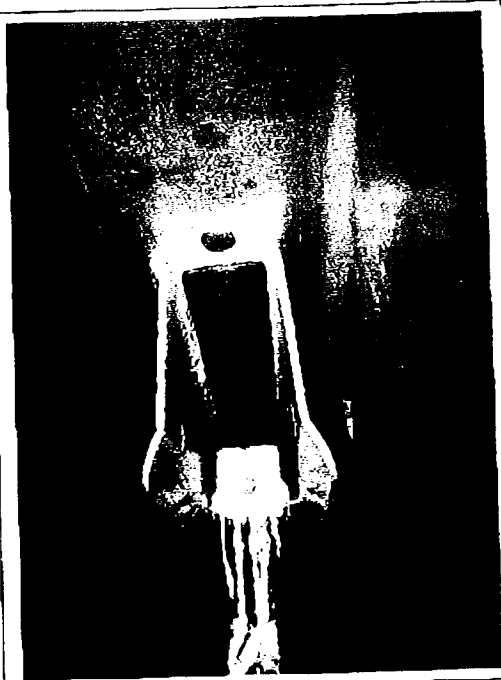


Figure 1:
Showing bottom reinforcement plate.
Use as template to drill (4) 3/8" bolt holes
thru the aluminum roof frame.
Use (4) 3/8"-16 grade 8 x 1.1/2" long with
(4) 3/8" grade 8 flat washers on bottom

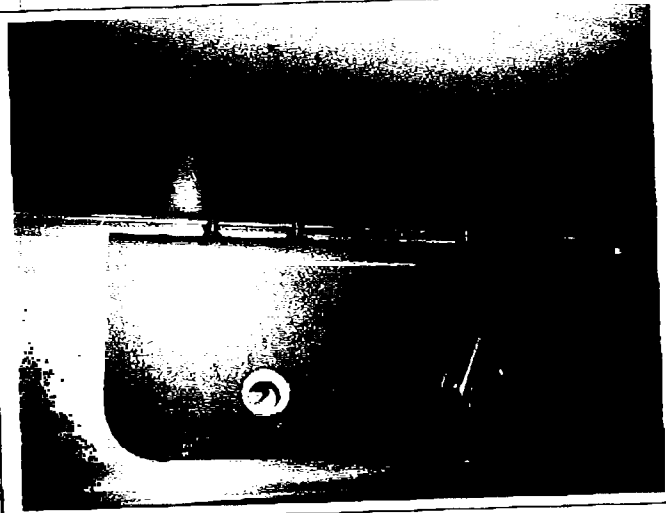


Figure 2:
View shown from inside of unit.

Showing top reinforcement angle.
Use (4) 3/8" grade 8 flat washers on top with
Use (4) 3/8"-16 lock nuts.

Then drill 3/4" dia. Hole thru aluminum frame vertical
leg. (on lift tube side only) Shown on the right above.
Left side above hole shown is not needed.

Install 3/4" pin x 5.9/16" long with **large** 3/4" flat washer
to inside using 3/32 cotter pin wrapped in both
directions.

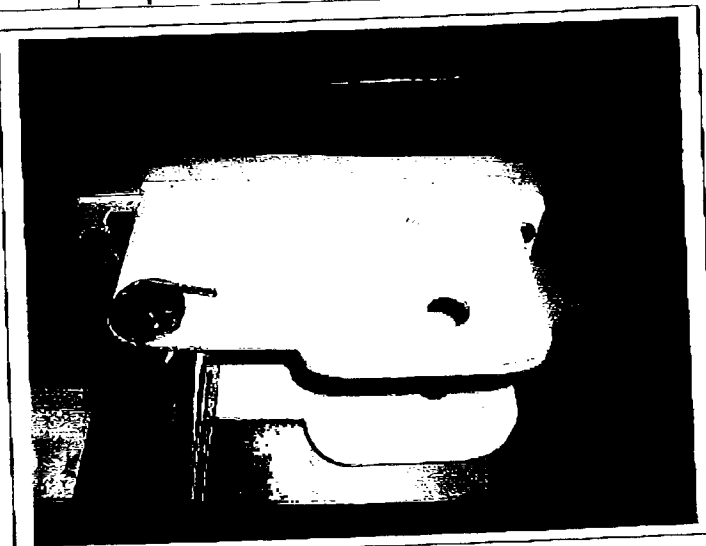


Figure 3:
View shown from outside of unit.

Showing outside pin washer cotter setup.

Install **small** 3/4" flat washer to outside using 3/32 cotter
pin wrapped in both directions.

Tool List:
Drill motor
13/32" drill bit
13/16" drill bit
Die grinder with burr tool attachment
Assortment of 9/16" wrenches and or sockets
Hammer

Notes:
Figures 1-3 shown are typical to all lift points on the trailer and the rear lift points on the head ramp.
The front lift points use the notched angles, And require the long lift pin towards the rear and the new
short pin thru the lift tubes.



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STANDARD TOLERANCES
UNLESS OTHERWISE
NOTED.

DEGREES: ± 2
FRACTIONS: $\pm 1/16"$
DECIMALS: .XX $\pm .060$
 .XX $\pm .030$
 .XXX $\pm .010$

ORIG. BY:
JPA

ORIG. DATE:
11/11/05

CHK BY:

CHK DATE:

Enclosed Roof Reinforcement Installation

VENDOR:

INV. NO.:

TITLE:

Enclosed Roof Reinforcement Installation Document

VENDOR P/N:

WEIGHT:

DWG. NO.:

PART NO.:
DOC00889

Sheet 1 of 3

SCALE:

SIZE:

REV.:
IR

REVISIONS		DESCRIPTION	DATE	BY
ZONE	REV			



Figure 4:
View shown from inside of Head Ramp unit.

Showing top reinforcement angle.
Use (4) 3/8" grade 8 flat washers on top with
Use (4) 3/8"-16 lock nuts.

Then drill 3/4" dia. Hole thru aluminum frame vertical
leg. (not on lift tube side)

Install 3/4" pin x 5.9/16" long with large 3/4" flat washer
to inside using 3/32 cotter pin wrapped in both
directions.

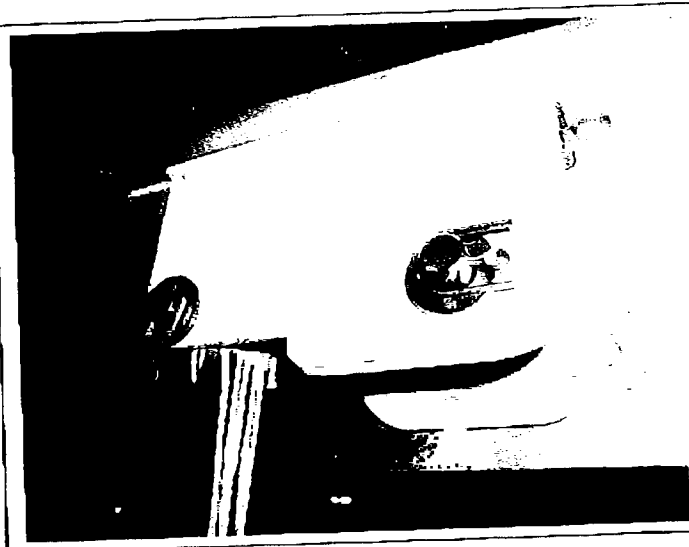


Figure 5:
View shown from outside of unit.

Showing outside pin washer cotter setup.
(rear) long pin
Install small 3/4" flat washer to outside using 3/32 cotter
pin wrapped in both directions.
(front) short pin
Install small 3/4" flat washer to inside and outside using
3/32 cotter pin wrapped in both directions on both sides.



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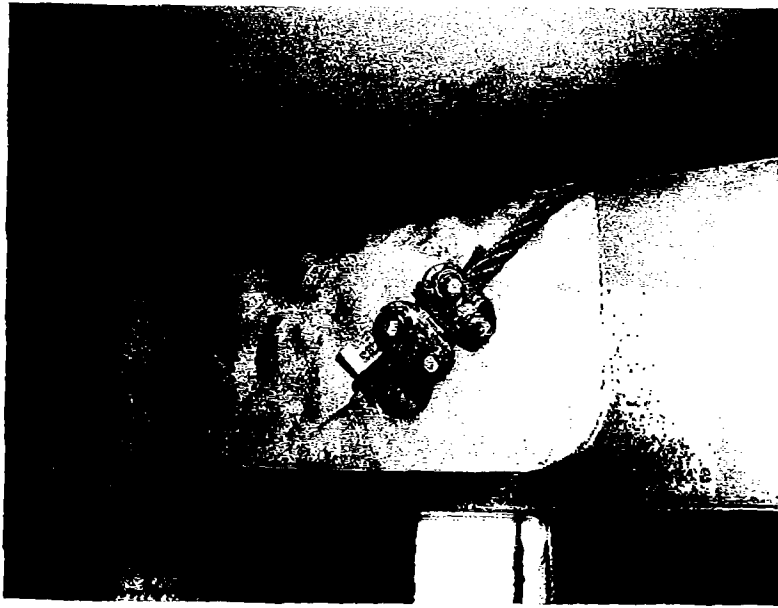


Figure 6:
View shown from inside of Trailer unit.

Drill 3/4" dia. Hole thru aluminum frame vertical leg. (not on lift tube side)

Safety Cable Installation

Use (2) 3/8" clips

Use (1) 29" 3/8" dia. Cable on Front of Head Ramp each side.

Use (1) 25" 3/8" dia. Cable on Rear of Head Ramp each side, and on all corners of Trailer.



Figure 6:
Reference view showing wire ties used to prevent cable from rubbing Kemlite roof material.



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