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OFFICE OF
DEFECTS INVESTIGATION

March 8, 2005

05V-090

VIA FACSIMILE: (202) 366-7882
ORIGINAL BY U.S. MAIL

Mr. Jon White
Chief, Defects and Recall Information Analysis Division
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC 20590

Re: HiSpec Wheel & Tire, Inc.

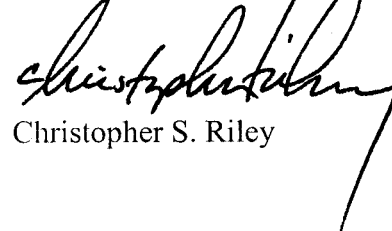
Please find enclosed the following documents:

1. Part 573 Defect and Non Compliance Report; and
2. Draft Owner Notification Letter.

Please call me if you need further information about this recall campaign.

Very truly yours,

BARNES & THORNBURG LLP



Christopher S. Riley

CSR/haa

Enclosures

cc: Brad Richards (w/encl.)
Duane Bevis (w/encl.)
Timothy J. Abeska, Esq. (w/encl.)
Marcie McCartney (w/encl.)

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Safety Defect and Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Report⁴

On March 3, 2005, ~~2001~~, HiSpec Wheel and Tire, Inc. [MFR] decided that (a defect which relates to motor vehicle safety)(~~a noncompliance with Federal Motor Vehicle Safety Standard No. _____~~) exists 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: March 4, 2005

Furnish the manufacturer's identification code for this recall (if applicable): N/A

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.

Carlisle Tire & Wheel, Inc. ("Carlisle")

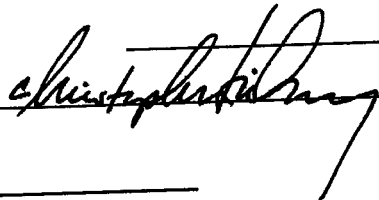
Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Brad Richards, President

Telephone Number: (574) 266-8332 Fax No.: (574) 266-8872

Name and Title of Person who prepared this report.

Christopher S. Riley, Attorney

Signed: 

⁴Each 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 Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5226 or by FAX at (202) 366-7882.

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: Wheel

Make: n/a Model: n/a

Part Number: 1629653030 Size: 16x6"

Function: Spare truck wheel

Other information which characterizes/distinguishes the items of equipment to be recalled:
Spare steel dual wheel that Carlisle manufactured on December 6, 2004.

Make: _____ Model: _____

Part Number: _____ Size: _____

Function: _____

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: _____ Model: _____

Part Number: _____ Size: _____

Function: _____

Model Years Involved: _____

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: _____ Model: _____

Part Number: _____ Size: _____

Function: _____

Other information which characterizes/distinguishes the items of equipment to be recalled:

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.

100%

II. Identifying the Recall Population

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

<u>Model</u>	<u>Year</u>	<u>Number of Items Potentially Involved</u>
	2004	155

Total Number Potentially Affected by the
Recall: 155

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance: 100%

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: HiSpec received from Four Winds a telephone call on February 25, 2005 indicating that a unit in inventory exhibited the problems discussed on the next page. HiSpec then tested wheels to determine the range of affected units. Wheels from other production dates did not exhibit the problem. Carlisle manufactured the problematic batch on December 6, 2004

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 wheels contain an incorrect offset. The offset is 1/8" too positive.

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

The center of the wheel was welded in the wrong position.

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

The improper offset causes the wheel to rub against the brake caliper.

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

The rubbing causes a squeaking sound.

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

Carlisle Tire & Wheel, Inc., 25 Windham Blvd., Aiken, South Carolina 29805

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

John Luedke, General Manager

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.

On February 25, 2005, Four Winds alerted HiSpec to the potential problem. HiSpec then tested wheels at Four Winds' facility that same day. On Monday, February 28, 2005, HiSpec began its effort to account for all wheels in the problematic batch. In speaking with its legal counsel on March 3, 2005, HiSpec determined that a defect existed necessitating recall of the problematic production batch.

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.

Carlisle built for HiSpec replacement wheels exhibiting a positive difference in offset from the recalled wheels. The recalled wheels will be quarantined and returned to Carlisle.

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

The corrected wheels will have an offset 1/8" less positive than the wheels in the problematic batch. Carlisle provided HiSpec a tool to measure the offset and confirm the correction.

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.

Carlisle ceased production of the wheels pending HiSpec test-fits the replacement wheels with the corrected offset. HiSpec intends to test-fit the replacement wheel by March 11, 2005.

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.

HiSpec already notified Four Winds, the only manufacturer to whom it sells the problematic wheels. HiSpec and Four Winds already began segregating the problematic wheels. HiSpec expects to receive from Four Winds information concerning the extent of wheels retail-sold. Upon receiving the information, HiSpec will send notification immediately. HiSpec estimates needing 15-30 days to complete repair or replacement of any wheel retail-sold.

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.

VEHICLE DEFECT OWNER NOTIFICATION LETTER

Dear Four Winds Owner:

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

REASON FOR THIS RECALL

HiSpec Wheel and Tire, Inc. ("HiSpec") has determined that a defect which relates to motor vehicle safety exists in certain 2005 Four Winds Class C Motorhomes equipped with spare tire wheels manufactured by Carlisle Tire & Wheel, Inc. These vehicles have an incorrect offset that causes the wheel to rub against the brake caliper.

WHAT WE WILL DO

At no charge to you, HiSpec will replace the defective wheel with one exhibiting the proper offset.

WHAT YOU SHOULD DO

Please inspect the spare wheel on your unit. If the spare wheel reads "CT&W 12 6 2004," your wheel needs replacing. Please contact your dealer to arrange a service date. Instructions for replacing the wheel have been sent to your dealer and a replacement wheel is available. The labor time necessary to perform this service correction is approximately 30 minutes. Please ask your dealer if you wish to know how much additional time will be needed to schedule and process your vehicle.

Your dealer is best equipped to obtain parts and provide service to ensure that your vehicle is corrected as promptly as possible. If, however, you take your vehicle to your dealer on the agreed service date, and they do not remedy this condition on that date or within three (3) days, we recommend you contact HiSpec customer service by calling (574) 266-8332.

After contacting your dealer and HiSpec, if you are still not able to have the safety defect remedied without charge and within a reasonable time, you may wish to write the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, SW, Washington DC 20590 or call 1-88-DASH-2-DOT (1-88-327-4236). (Washington DC residents use 1-202-366-0123).

The enclosed owner reply card identifies your vehicle. Presentation of this card to your dealer will assist in making the necessary correction in the shortest possible time. If you have sold or traded your vehicle, please let us know by completing the postage paid reply card and returning it to us.

We are sorry to cause this inconvenience; however, we have taken this action in the interest of your safety and continued satisfaction with our products.