Founded in 1852 by Sidney Davy Miller

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January 23, 2006

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VIA FACSIMILE AND CERTIFIED MAIL

Ms. Kelly Schuler
U.S. Department of Transportation
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

Re: NHTSA Campaign Number: 05E-062

Dear Ms. Schuler:

Enclosed is the First Quarterly Report submitted on behalf of Valley Industries, LLC for NHTSA Campaign Number 05E-062. Please do not hesitate to contact me with any questions in this regard.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

Amy M. Johnston

AMJ/sll

Enclosure

cc: Bryan Fletcher

BHLTB:493954.1\128662-00001

EQUIPMENT SAFETY RECALL QUARTERLY REPORT INFORMATION

Required per 49 CFR Part 573.6

Report Date: January 23, 2006 Calendar Quarter: First

Safety Recall Quarterly Report from September 27, 2005 through January 23, 2006

Manufacturer: Valley Industries, LLC

Report Author: Robert J. Haddad/Amy M. Johnston Phone: (248)879-2000

Miller, Canfield, Paddock and Stone, P.L.C.

Recall Subject: 2005 Nissan Xterra Trailer Hitches (Part no. 8285081 or 8285052)

1. NHTSA Safety Recall Campaign Number: 05E-062

Also, for completeness, if your company has assigned a code number to this campaign, please provide your code: N/A

2. (a) The date notification to purchasers began: September 14, 2005

(b) The date notification to purchasers was completed: November 7, 2005

The Total Number of Items of Equipment Involved: 498

The total number of items involved in the subject campaign (including all items sold or distributed to purchasers, dealers, distributors, and similar entities beyond the immediate control of the manufacturer/importer).

Number of Items Returned from Inventory or Remedied Prior to Sale: N/A Includes (a) the total number of items returned from Manufacturer, Distributor, Dealer or Retailer inventory or (b) otherwise remedied prior to sale to consumers.

4. (a) Total Number Inspected & Remedied: 308 (305 replacement hitches have been delivered to customers, along with instructions regarding installation and reimbursement; 3 hitches were returned for credit prior to installation on the vehicle).

Total number of items which were inspected and/or otherwise repaired or remedied.

(b) Total Number Inspected & NOT REQUIRING REMEDY: N/A
Total number of items involved in the recall and inspected, but determined to NOT REQUEE REMEDIAL or recall repair work.

5. Items Determined to be Unreachable: 20

Total Number Exported:

Total Number Stolen:

Total Number Scrapped:

Total Number Unable to Notify: 20 (cash sales to customers; identity unknown)

Total Number Otherwise Unreachable: