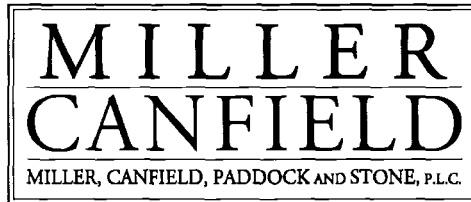


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May 23, 2006

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

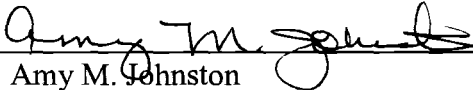
Re: NHTSA Campaign Number: 05E-062

Dear Ms. Schuler:

Enclosed is the Second 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.

By: 
Amy M. Johnston

AMJ/sll

Enclosure

cc: Bryan Fletcher

BHLIB:493955.2\129112-00001

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NHTSA INVESTIGATION

EQUIPMENT SAFETY RECALL QUARTERLY REPORT INFORMATION

Required per 49 CFR Part 573.6

Report Date: **May 23, 2006**

Calendar Quarter: **Second**

Safety Recall Quarterly Report from January 23, 2006 through May 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**

3. 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: **320 (317 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 REQUIRE 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: