



HEIL TRAILER INTERNATIONAL

5741 CORNELISON ROAD, 6400 BUILDING A
CHATTANOOGA, TENNESSEE 37411
(800) 400-6913 TELEFAX: (423) 855-6386

A **DOVER** INDUSTRIES COMPANY

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06V-045-
(8 pages)

February 9, 2006

Via FedEx Priority Overnight

Associate Administrator for Enforcement
Attention: Pat Wallace
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC 20590

Re: Heil Pull Trailer Dolly Frame Recall
Manufacturer's Recall ID Code: EWR282

To Whom It May Concern:

Please be advised that Heil Trailer International has determined there is an inadequacy in the weld sequencing of its Pull Trailer dolly frame, which could potentially result in cracking at the rear of the suspension frame. Such a crack, if left unattended could progress to an abrupt failure in the dolly frame, potentially causing property damage and injury.

To date, Heil is aware of only 2 dolly frame failures; however, there have been no injuries or property damage experienced. In an effort to provide excellent service to our customers and to comply with Federal regulations, Heil decided that a safety recall is in order to ensure the upgrade of the weld sequencing of the pull trailers with air ride suspension. As a result, all affected customers will be notified of this recall and the need to have their units upgraded. The upgrade may be performed without cost, at a Heil-approved repair shop of their choice.

There are a total of 87 units that are affected by this field campaign. As of January 30, 2006, 24 have been upgraded, and an additional 8 are scheduled to have the upgrade procedure performed.

If you have any further questions regarding this matter, I would appreciate your call.

Respectfully submitted,

Beth A. Bennett
Legal and Risk Management Administration Coordinator
Heil Trailer International

cc: Lynn Moses
Mike Johnson
Bill Nehrkorn

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Report

On September 23, 2005, Heil Trailer International decided that a defect which relates to motor vehicle safety 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 Reports.

Date this report was prepared: February 6, 2006

Furnish the manufacturer's identification code for this recall (if applicable): EWR282

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.

Heil Trailer International, d/b/a The Heil Co.

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

Beth A. Bennett, Legal and Risk Management Administration Coordinator

Telephone Number: 423-499-1300 x. 506 Fax No.: 423-855-6386

Name and Title of Person who prepared this report.

Beth A. Bennett

Legal and Risk Management Administration Coordinator

Signed: Beth A. Bennett

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): Heil **Model** **Years Involved:** 1999-2006 **Model(s):** Heil pull trailer with air ride suspension

Production Dates: Beginning: 1999 **Ending:** 2006

VIN Range: Beginning: _____ **Ending:** _____

Vehicle Type: Petro **Bodystyle:** California Pull Trailer

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Heil's California Pull Trailer with air ride suspension

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. Identify the Recall Population

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

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
<u>California Pull Trailer</u>	<u>1999-2006</u>	<u>55</u>

Total Number Potentially Affected by the Recall: 55

4. Furnish the approximate percentage of the total number of vehicles 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 vehicles:

The recall population was determined by the total number of units manufactured minus the total number of units having already received the upgrade.

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.

Potential frame cracking at the rear of suspension frame bracket.

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

Weld sequencing.

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

Crack in frame has potential to propagate if not corrected by Heil's recommended repair procedure.

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

Potentially develops as a hair-line crack and progresses upward through the frame member.

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

N/A

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

N/A

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.

On 8/17/05 Cox Petroleum (serial number 67745) failure in Bakersfield; 8/18/05 – Mike Hinson from Cox Petroleum e-mailed photos and a description of the failure; 9/1/05 – Engineering researched involved serial numbers to determine possible number of trailers involved; 9/2/05 – Received pictures of Dandee pull trailer failure, serial number 67750; 9/6/05 – 9/8/05 – Trip to Bakersfield, CA to look at both the Dandee and Cox unit failures as well as other units in their fleets; 9/15/05-9/17/05 – Meetings with engineering, to discuss failure and repair; 9/21/05 – Final repair drawings, letter and trailer information completed and discussed with group; 12/8/05 – NHTSA opened preliminary investigation.

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.

Assumptions of Definitions

Manufacturer's remedy: Revisions made on the manufacturing floor, at the manufacturing facility.

Recall Condition: The specification (part and process) that existed in the past that allowed for the fabrication of the component/assembly that ultimately failed.

Remedy component/assembly: The component/assembly that is fabricated by following the Manufacturer's remedy, as defined above.

Recalled component/assembly: The component/assembly that ultimately failed.

Production remedy: Manufacturer's remedy, as defined above

Recall remedy in the field: The temporary field repair that is being executed while we, the manufacture, build replacement frames to the specification of the Production remedy.

Modifications were made to the published weld procedures for the frame in question. Two distinct processes were used to communicate the revised procedure to manufacturing. (1) A weldment instruction (701-8078) was published to clarify welding procedures for the dolly frame. (See Figure 1.1.); and (2) A quality communication (2005-008) was published to clarify welding procedures for the dolly frame. (See Figure 1.2.) For the remedy condition, the tower plate welds and air bag plate welds are to stop ½" away from the edge of the frame rail. For the recall condition, the tower plate welds and air bag plate welds may continue to the edge of the frame rail.

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

For the remedy component/assembly, the tower plate welds and air bag plate welds are to stop 1/2" away from the edge of the frame rail.

For the recall component/assembly, the tower plate welds and air bag plate welds may continue to the edge of the frame rail.

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.

The weldment instruction (701-8078) was released on September 8, 2005. This release date indicates the date of incorporation into vehicle production. This production remedy is different from the recall remedy in the field. The recall remedy in the field is described by the attached images and instructions (Figures 1.1 and 1.2). This information is a duplication of what was released for field service.

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.

The 577 letter is anticipated to be mailed to each of the noncompliant customers within 5 days of receiving a formal recall number from ODI. The only foreseen problem with implementing this recall is that we cannot force these customers to ground their units long enough to make the repair.

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 that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements

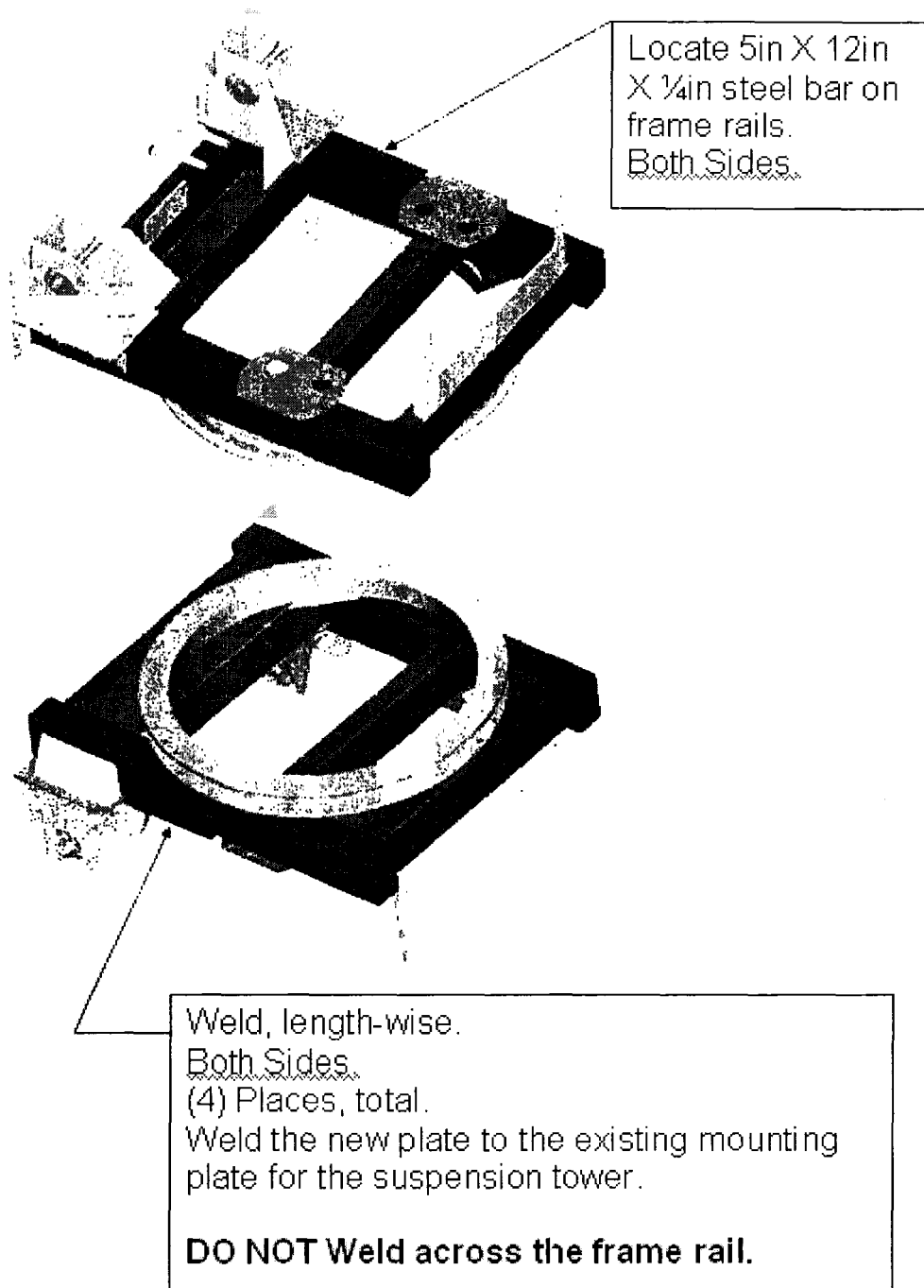
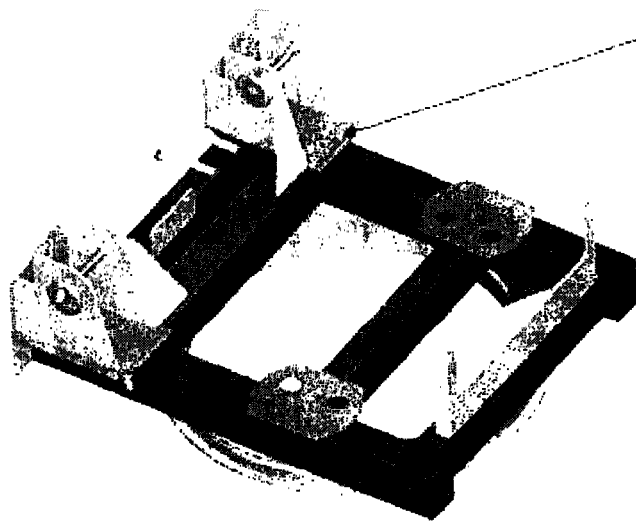
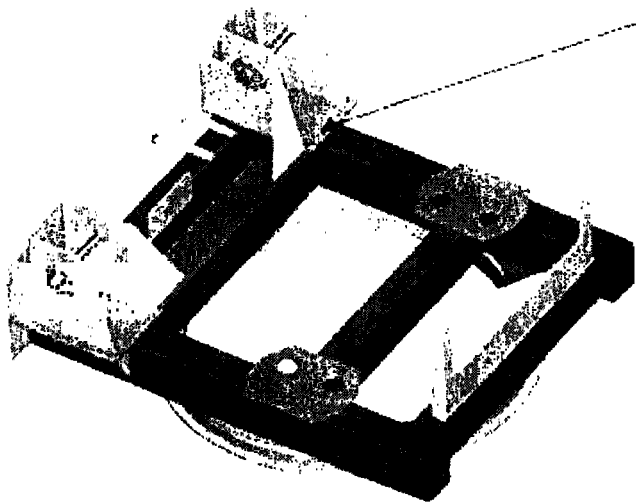


Fig 1.2



Mark plate at
 $\frac{3}{4}$ in from end.
Both Sides.



Cut and remove end
of plate at mark.
Both Sides.
Grind off existing
weld.

Fig. 1.1