



U.S. Department
of Transportation

400 Seventh Street, SW
Washington, DC 20590

**National Highway
Traffic Safety
Administration**

April 25, 2007

JASON G. MURRAY
MOFFATT THOMAS BARRETT
ROCK & FIELDS, CHTD.
US BANK PLAZA BUILDING
PO BOX 829
BOISE ID 83701-0829

NVS-215paw
07V-177

Subject: WHEEL HUB ASSEMBLY

Dear MR. MURRAY:

This letter is to acknowledge the recent defect information report filed on behalf of your client, Gem State Manufacturing, Inc. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

TRAILMAX/T-10-UT/2005-2006
TRAILMAX/T-12-UT/2005-2006

NHTSA Campaign Number: 07V-177

Mfg's Report Date: April 20, 2007

Components: WHEEL: CAP/COVER/HUB

Potential Number of Units Affected: 900

Summary:

ON CERTAIN DOUBLE-AXLE UTILITY TRAILERS, THERE MAY BE A DEFECT IN THE AXLE END COMPONENTS.

Consequence:

THIS DEFECT COULD RESULT IN A WHEEL END SEPARATION, WHERE THE TRAILER WHEEL AND HUB PHYSICALLY SEPARATE FROM THE TRAILER, INCREASING THE RISK OF A CRASH.

Remedy:

DEALERS WILL INSPECT AND EITHER REPAIR OR REPLACE THE AFFECTED TRAILER PARTS FREE OF CHARGE. THE RECALL IS EXPECTED TO BEGIN DURING APRIL 2007. OWNERS MAY CONTACT GEM STATE AT 1-800-447-0213.

Notes:

CUSTOMERS MAY ALSO CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S VEHICLE SAFETY HOTLINE AT 1-888-327-4236 (TTY 1-800-424-9153), OR GO TO [HTTP://WWW.SAFERCAR.GOV](http://www.safercar.gov).

We have reviewed your proposed owner notification letter and it does not meet all the requirements of Part 577.

The statement in the second paragraph, "The aforementioned defect may not exist in each such trailer,..." cannot be used. This statement implies that the defect **may not exist** on any of the vehicles and is considered to be a disclaimer specifically prohibited by Part 577.8(a).

Please revise the owner letters to include the following updated NHTSA hotline information: "...the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, SW., Washington, DC 20590; or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>."

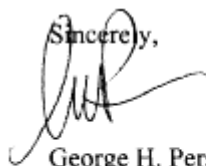
Also, Gem State needs to reimburse their customers if the repairs have already been performed. Therefore a sentence needs to be added concerning reimbursement for prior repairs, i.e., "If you had this repair performed before you received this letter, you may be eligible to receive reimbursement for the cost of obtaining a pre-notification remedy of the problem associated with this recall. For more information contact Gem State Manufacturing's warranty department at 1-800-447-0213."

Please provide the following additional information and be reminded of the following requirements:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. As stated in your report, owner notification is expected to begin during April 2007. Therefore, the first quarterly report will be due on or before July 30, 2007.

Your contacts for this recall will be Pat Wallace or Delia Lopez, who may be reached by phone at 202-366-5232 or 202-366-9525 or by email at patricia.wallace@dot.gov or delia.lopez@dot.gov. We look forward to working with you for successful completion of this recall campaign.

Sincerely,


George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement