

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

07V-350
(11 Pages)

On July 26, 2007, Koch Performance Group, LLC [MFR] decided that (a defect which relates to motor vehicle safety) exists 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 Responsibility and Reports.

Date this report was prepared: July 31, 2007

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

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.

Koch Performance Group, LLC DBA RackandRoll

640 Coronado Ct, Grover Beach, CA 93433 OR (P. O. Box 4155, San Luis Obispo, CA 93403)

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

Patrice Sanchez, General Manager Koch Performance Group, LLC

Telephone Number: 805.441.9300 Fax No.: 805.481.1922

Name and Title of Person who prepared this report.

Patrice Sanchez, General Manager

Signed:



¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210 or by FAX at (202) 366-7882.

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): RackandRoll KD **Model Years Involved:** 2005 **Model(s):** KD

Production Dates: Beginning: 1/1/2005 **Ending:** 12/31/2005

VIN Range: Beginning: 1K9SF10195N245001 **Ending:** 1K9SF10185N245166

Vehicle Type: Sports Utility Trailer **Bodystyle:** Frame

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

All KD models are included in the recall.

Make(s): RackandRoll KD **Model Years Involved:** 2006 **Model(s):** KD

Production Dates: Beginning: 1/1/2006 **Ending:** 12/31/2006

VIN Range: Beginning: 1K9SF10176N245001 **Ending:** 1K9SF10126N245200

VIN Range: Beginning: 1K9SF11186N245121 **Ending:** 1K9SF11176N245420

Vehicle Type: Sports Utility Trailer **Bodystyle:** Frame

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

All KD models are included in the recall.

Make(s): RackandRoll KD **Model Years Involved:** 2007 **Model(s):** KD

Production Dates: Beginning: 1/1/2007 **Ending:** 7/31/2007

VIN Range: Beginning: 1K9SF11177N245001 **Ending:** 1K9SF11107N245129

Vehicle Type: Sports Utility Trailer **Bodystyle:** Frame

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

All KD models are included in the recall.

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% of the KD model
Trailers produced January 1, 2005 through July 31st, 2007.

II. Identify the Recall Population

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

| Vehicles | Number of |
|--|---|
| <u>Model: RackandRoll KD Trailers</u> | <u>Year: see below Potentially Involved:</u> |
| 2005 | 164 |
| 2006 | 483 |
| 2007 | 114 |
| | |
| | |
| | |
| | |

Total Number Potentially Affected by the Recall: 761

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:

All the trailers involved have the same center rail. One of our subcontractors pulled the trailer an unusual distance in a short amount of time (35,000 miles in 4 months) on rough terrain and frequently put more weight on the trailer than what has been recommended. This trailer developed a hairline fracture on the center rail. Even though this may very well be an isolated incident, our company has recently developed accessories that will influence our customers to put more weight on the trailer. Therefore a decision was made to recall all trailers and increase the strength of the center rail avoiding any problems that may arise.

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.

Apparent metal fatigue. The location of the defect is on the center rail forward of the front crossmember.

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

When the trailer is overloaded (over 250 lbs) and is towed extreme distances in a short amount of time and especially on unpaved roads, bouncing may occur that causes undue pressure on the center rail. This may fatigue the metal and cause a hairline fracture to occur on the underside of the center rail of the trailer.

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

If not detected could cause the center rail to break.

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

A loud clicking noise.

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.

One hairline fracture occurred in one trailer on 7/22/07. This incident was reported to us on 7/24/07. The company engineer studied the center rail and determined that although a rare occurrence, the safety of the public would be the foremost concern and a recall of all trailers would be in the best interest of all to add strength to the center rail in question. Also, RackandRoll is coming out with accessories that would allow customers to put more weight on the trailer (underneath the trailer in baskets). To prevent customers from overloading the trailer; the solution is to make the trailer stronger in all aspects to protect customers even if overloading occurs.

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.

n/a

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

1) All customers will receive an interim "warning letter" addressing the problem and alerting the customer to the conditions which cause the problem. The customer will be

notified that Koch Performance Group will reimburse all expenses in relation to the recall.

2) A satisfactory remedy will be manufactured by Koch Performance Group and sent to all customers.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

1) The remedy is that from 8/1/2007 forward all trailers will be manufactured with a steel or aluminum insert inside the center rail which will increase the strength of the center rail.

2) Retro Kit Upgrades will be produced for all recalled trailers. It has not yet been determined if this Retro Kit Upgrade will be an insert or an outer brace.

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

After RackandRoll engineers have determined the best remedy; the insert or brace will be installed in or on the recalled trailer. If the solution is a brace on the underside of the center rail, then this will clearly be visible. If an insert is selected for the remedy then each trailer will receive an "upgraded sticker" that will be applied to the center rail of the trailer.

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.

As stated above, all trailers manufactured from 8/1/2007 will have steel or aluminum inserts inside center rail.

VI. Identify the Recall Schedule

10. 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.

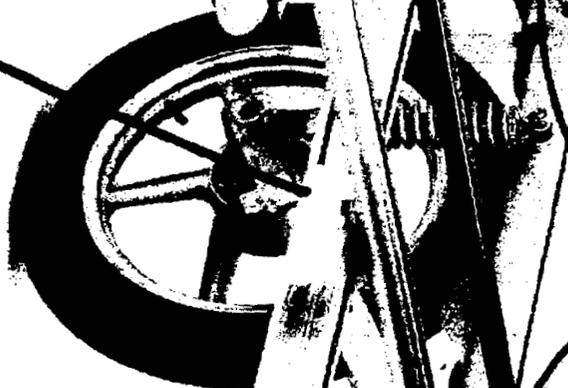
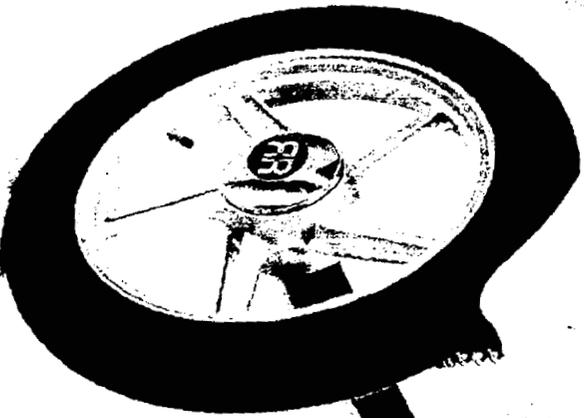
NOTICES: All retail stores will be notified immediately. R.L. Polk has been hired by Koch Performance Group to check DMV records for addresses of all registered RackandRoll KD Model Trailer owners. Form INF 1106 (Commercial Requester Account Application) has already been submitted to the CA DMV. Koch Performance Group estimates that the DMV Records will be available by 9/15/07 at the latest and registered mail "Interim Warnings" will go out at that time. Koch Performance Group is preparing to put a RECALL- "What You Can Do" notice on the company website.

REMEDY: The remedy should be ready by 9/30/07 and issued to all trailer owners by 10/30/07.

VII. Furnish Recall Communications

11. 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 579.5 requirements.



"I" Bolt placed inside existing center rail.

approximate location of hair line fracture

center rail of trailer

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