



Scott Health & Safety
Monroe Corporate Center

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Associate Administrator for Safety Assurance (NSA-01)
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC, 20590

07V-489
(13 pages)

Date: October 15, 2007

Attention: Mr. Jon White, Chief, Defects and Recall Information Analysis Division

This is to inform the NHTSA that Scott Health and Safety is preparing a recall notice on an equipment attached to the Liberty 1 and Liberty 2 air filling station trainers used in the fire services industry. The recall involves the spare tire mounting bracket.

Although the trailer is not a motor vehicle this notice follows the guide line entitled "A Guide for the Reporting, Notification, and Remedy of Motor Vehicle and Motor Vehicle Equipment in Accordance with Title 49 of the United States Code, Chapter 301 and Supporting Federal Regulations".

- Included is the "Safety Defect and Noncompliance Report Guide for Equipment Part 573 Defect and Noncompliance Report".
- Draft of the Recall Notice.

If you require any further information at this time please contact me.

Sincerely,

Jim Buswell
Certification and Regulation Engineer

Telephone: 704.291.8392
Fax: 704.291.8390
e-mail - jbuswell@tycoint.com

RECEIVED

2007 OCT 16 A 10:35

DEFECTS INVESTIGATION
RECALL MGMT DIV.

Safety Defect and Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Report⁽¹⁾

On October 9, 2007, Scott Health & Safety, a division of Scott Technologies, Inc. decided that a defect which relates to motor vehicle safety exists in items of motor vehicle equipment 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: October 15, 2007

Furnish the manufacturer's identification code for this recall (if applicable): None

- 1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.**

Scott Health & Safety, a division of Scott Technologies, Inc.

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

Mike Ryan Vice President, General Manager

Telephone Number: 704-291-8403 **Fax No.:** 704-291-8340

Name and Title of Person who prepared this report.

Richard Sabacinski Manager, Engineering Services

Signed:  10/15/07

I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:

Generic name of the item: Spare Tire Mount

Make: Air Compressor Trailer

Model: Liberty I and II

Part Number: AB110-0436

Size: N/Applicable

Function: Mounting bracket for spare tire.

Other information which characterizes/distinguishes the items of equipment to be recalled: See photographs.

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. This includes all brackets, one per trailer, manufactured between October 1, 2002 and October 9, 2007.

II. Identifying the Recall Population

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

Total Number Potentially Affected by the Recall: 188

This includes several trailers that were shipped internationally.

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance:

>80%

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 items of equipment: This is the total population of the spare tire mount that was ever manufactured.

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. The spare tire mount may fail at one or more of the welds on the upright bar resulting in the spare tire coming loose and falling from the trailer. See photographs of the tire mount.

Describe the cause(s) of the defect or noncompliance condition. The combination of the weld, location and size of gussets and strength of underlying material may not be suitable for multiple years of over the road use. Only one actual field failure has occurred even though the product has been in the field for five years. However, as a result of the investigation surrounding the cause of failure, which was cracking at the welds, Scott is issuing the notice for replacement of the mount with one of a different design.

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

The most likely scenario is the tire mount will crack to the point it will be visible to the user. It is possible that if the trailer is not inspected, the crack may

expand and propagate to the point where it will cause a failure resulting in the spare tire and a portion of the mount falling from the trailer

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

There is no indication that the failure will be immediate and catastrophic. Indications are that the welds will crack and slowly separate. These cracks will be large and visible to the user. The mount may bend under the weight of the tire warning of incipient failure.

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

The part was manufactured by Scott Health & Safety.

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

The part was manufactured by Scott Health & Safety

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.

There were two reports from the field. The first report, of a failure, was received several weeks ago (date not documented) but the part was not received from the field until ten working days ago. There were no reports of injuries or property damage at that time. The Engineering Department began work on evaluation of the failure using the parts received from the field and parts in house from the production line. Product shipments were stopped pending the results of the investigation. The second report, one where failure was detected before the parts separated, came in during the investigation. Five working days ago the decision was made that the parts were defective and a notice was

required. Work began immediately on a user notice and designing a replacement part for distribution to the field.

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.

Not Applicable.

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.

The remedy is replacement of the old style spare tire mount with one of a new design. The old style mount was capable of holding the tire in the proper attitude for quite some time as is demonstrated by the fact that there have been so few failures since introduction several years ago. However, the new design has several improvements. The upright is larger in cross section, there is another frame attachment point and the gussets are larger. The overall result is a more robust design.

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.

Once the Engineering Analysis began, product shipping was halted. All new trailers are being fitted with the new design spare tire mount. No production is leaving the facility with the old style mount.

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.

There are only 188 trailers in the field. The owners of the trailers are readily identifiable. The plan is to complete the users notice, contact the users by phone or fax and notify them of the situation. Express mail or fax a copy of the

notice. As soon as the shipping information is received, provide a replacement spare tire mount at no charge to the user.

Possible problems include users not wishing to participate in the recall and the fact that several of the trailers are located overseas which may result in communications and logistics problems.

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.*

A draft copy is attached for your review.

Note: These documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

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

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5226 or by FAX at (202) 366-7882.

The Privacy Act of 1974 - Public Law 93-579, As Amended: *This information is requested pursuant to the authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response maybe used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administration enforcement or litigation against a manufacturer, your response, or statistical summary thereof, may be used in support of the agency's action.*

IMPORTANT SAFETY NOTICE

WARNING

The Spare Tire Mount on some Liberty Trailers may come loose and separate from the trailer. Do not operate your trailer with the spare tire and mount still installed. Failure to read, understand and follow the instructions in this safety notice may result in personal injury and death.

Date: October 12, 2007

To: Users of Scott Liberty Compressor Trailers

Why you received this notice.

Scott Health and Safety has recently learned of an incident where the spare tire mount and tire on a Liberty Compressor Trailer come loose and fell off during use. There were no injuries reported as a result of this incident. Upon investigation Scott found improper welding of the joints on the Spare Tire Mount, P/N AB110-0436. The welded joints may separate resulting in the mount and tire falling from the trailer.

Your Immediate Action is Required

All Liberty I and II trailers manufactured by Scott from October 1, 2002 through October 6, 2007 are involved in this recall. Figure 1 shows the front of a Liberty trailer showing the location of the spare tire and mount. Figure 2 shows the mounted spare tire from the back so you can see the spare tire mount.



Fig 1. Front View – Liberty Trailer with Spare Tire Mount

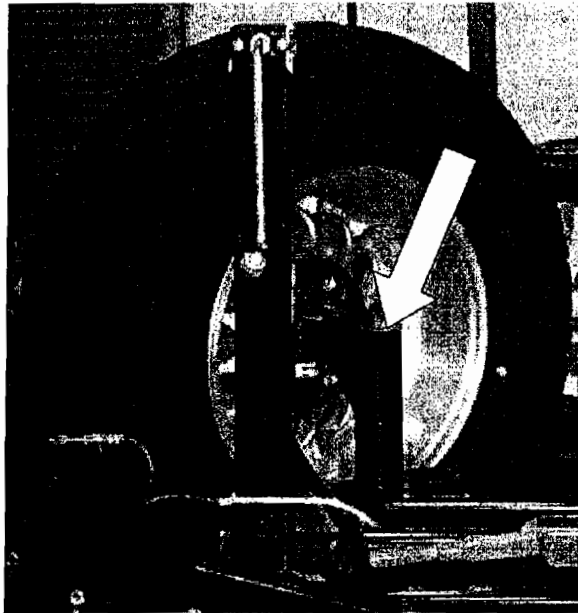
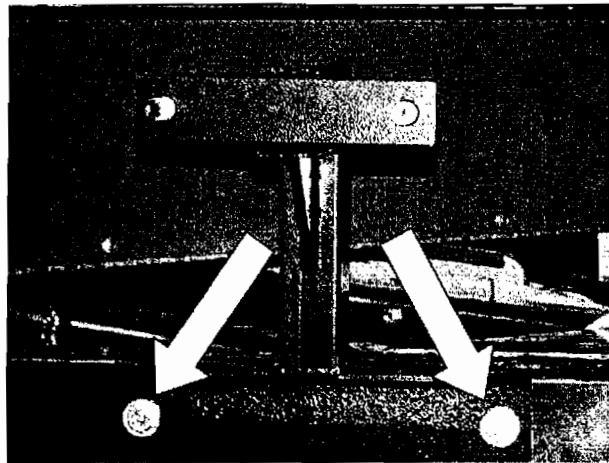


Fig 2. Rear View of Spare Tire Mount

Figure 3 shows how the Spare Tire Mount is fastened to the frame of the trailer. Unscrew the two bolts by rotating the bolt heads counterclockwise while preventing rotation of the nuts. Support the trailer mount so it doesn't come loose accidentally while the screws are being removed.



**Fig. 3. Old Style Spare Tire Mount attachment to Trailer Frame – Two Bolts
Loosen and remove bolts to remove spare tire mount.**

The date of manufacture of your trailer can be found on the builders plate located near the control panel at the back of the trailer. See Fig 4. The date is on the serial number line at the far right end and is in the form "mm/dd/yy". The trailers that are included in this notice are all trailers with manufacture dates from 10/01/02 through 10/06/07. If you have any questions, contact your authorized Scott Compressor Service Center or Scott Technical Service.

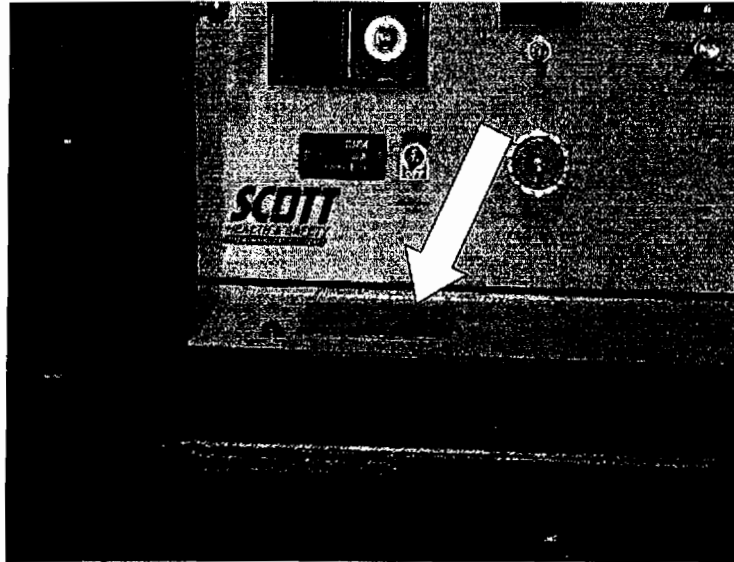


Fig 4. Builders plate located near the control panel.

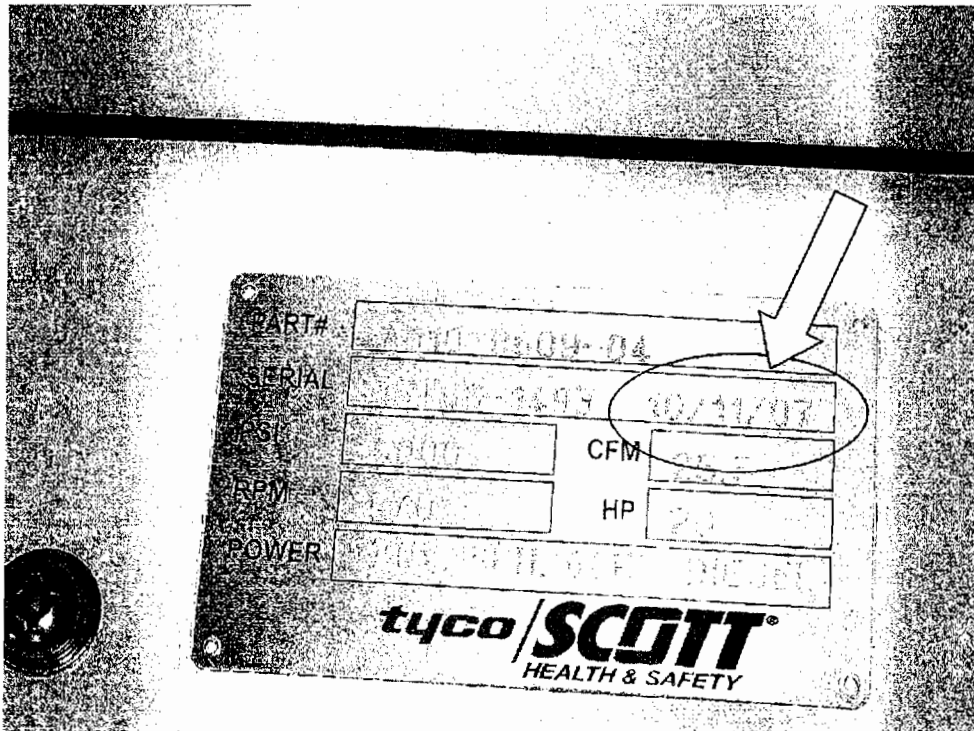


Fig 5. Builders Plate Closeup - Note Manufacture date

If your Liberty Trailer is included in this notice, do not tow the trailer, park it in a safe place. Remove the spare tire from the spare tire mount and spare tire mount and store them safely or take the trailer to a Scott Authorized Compressor Service center so the tire mount can be removed from the trailer. If the tire mount is not secure, remove the tire mount where trailer is parked. Put the tire mount aside and use the trailer normally until a replacement spare tire mount is received.

DRAFT COPY – DO NOT DISTRIBUTE

Immediately contact Scott Health and Safety's Technical Support Department at 1-800-247-7257 or use the attached fax back form. Scott will arrange to have a new Spare Tire Mount to be sent to a Scott Authorized Compressor Service Center near you for installation at no charge to you. The Scott Authorized Service Center will collect the old spare tire mount and return it to the factory. If you have any questions, contact your Scott Distributor or Scott at 1-800-247-7257.

USER RESPONSE FORM

Applying to SCOTT® Liberty I and II Compressed Air Trailers Affected by this Notice
SEE IMPORTANT SAFETY NOTICE H/S xxxx DATED 10/2007 FOR SPECIFIC INFORMATION
REGARDING SCOTT Liberty I and II Compressed Air Trailers.

Please type or print

Company/Organization

Shipping Address (*Must include Street Address NOT Post Office Box*)

Bill to Address (For tracking purposes only! There will be no charge to you for this service.)

City

State/Province

Zip/Postal Code

Company/Organization Contact name & Title

Telephone #

Fax #

Email Address

Authorized Signature

VIN Numbers of Trailers you have that are affected by this Notice

For additional information concerning the Liberty Traller Spare Tire Mount program please contact SCOTT Technical Support at 1-800-247-7257 or through email at hsservice@tycoint.com or your SCOTT Authorized Compressor Distributor or SCOTT Authorized Compressor Service Center.

Once you have completed this form, fax it to SCOTT at 1-704-291-8420 in the United States, or fold and seal as marked and place in U.S. Mail. Outside the United States please fold, seal, apply proper postage, and place in mail.

Photocopy as many copies of this form as you need to register all the affected filters with Scott.