

Founded in 1852
by Sidney Davy Miller

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November 1, 2007

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RECEIVED
2007 NOV. - 6 AM 10:00
DEFECTS INVESTIGATION
RECALL MGMT DIV.

VIA FACSIMILE (202-366-1767)
AND CERTIFIED MAIL

07V-523
(6 Pages)

Ms. Pat Wallace/Ms. Kelly Schuler
U.S. Department of Transportation
National Highway Traffic Safety Administration
Office of Defects Investigation
1200 New Jersey Avenue SE
West Building – W48-212
Washington, DC 20590

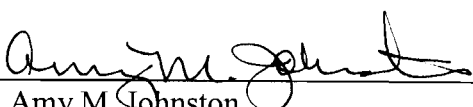
Re: Recall Campaign no. _____
Thule Galvanized 5x7 Utility Trailer

Dear Ms. Wallace:

Please be advised that we represent Thule Towing Systems LLC (“Thule”). Attached is a Part 573 Defect and Noncompliance Report for Thule 5x7 galvanized utility trailers. Please file in your usual manner. Thank you for your assistance in this regard.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By: 
Amy M. Johnston

AMJ/dlg

Enclosure

Safety Defect and Noncompliance Report for Equipment
PART 573 Defect and Noncompliance Report

On October 25, 2007, Thule Towing Systems LLC decided that a defect which relates to motor vehicle safety exits 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 31, 2007

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

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.

Thule Towing Systems LLC
32501 Dequindre Rd
Madison Heights, MI 48071

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

Thomas F. McMillan
Vice President of Finance

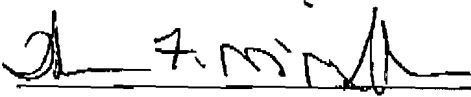
Telephone Number: (209) 368-8881

Fax No.: (209) 369-8675

Name and Title of Person who prepared this report.

Thomas F. McMillan
Thule Towing Systems LLC

Signed: _____



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:

Thule utility trailer

Make: Thule 5x7 galvanized utility trailer **Model:** 3205

Part Number: The bracket part number is T-18114

Function:

The galvanized utility trailer is designed to attach to the rear of a vehicle via hitch mechanism and provide capabilities to haul various items.

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

The subject galvanized utility trailers are identifiable by the following: a label containing the name, "Thule Towing System LLC" and a vehicle identification number ("VIN"), which contains the manufacturer code, 5XD. This label is attached to the driver's side tow bar.

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. Unknown.

II. Identifying the Recall Population

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

73 utility trailers

Total Number Potentially Affected by the Recall: 73 units

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

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:

The recall population was determined based on the total quantity of galvanized utility trailers assembled by Sno-Pro, Inc., a third party and Thule Towing Systems LLC. Upon information and belief, Sno-Pro, Inc. incorrectly assembled the galvanized utility trailer. As the number of improperly assembled trailers is unknown, the recall population is based on the total number of assembled galvanized utility trailers distributed in the United States.

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.

During assembly, a bracket used to attach the axle to the trailer body is reversed. The improper installation of the bracket may cause the axle to disengage from the trailer while in use.

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

Incorrectly assembly of the utility trailer.

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

The axle may release partially or wholly from trailer.

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

The trailer may begin to vibrate or weave while in tow.

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

Not applicable.

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

Not applicable.

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.

October, 2007: Thule received notification of incidents involving the galvanized utility trailers. No personal injuries or deaths were reported. The claims indicated that the trailer disengaged from the axle during use. Thule representatives examined photographs of the trailers involved in the incidents and determined that in all instances the axle was improperly bolted to the trailer body.

October 2, 2007: Thule confirmed that, based on dealer location and customer information, the trailers were all assembled by Sno-Pro, Inc.

October 15, 2007 and October 25, 2007: Thule representative examined and determine quantity of unassembled inventory.

October 25, 2007: Thule determined the final quantity of assembled galvanized trailers that had distributed and the possible number of utility trailers that had been misassembled.

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.

Disconnect the improperly assembled bracket and re-assemble in a proper manner.

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

Proper affixation of the bracket to the trailer body.

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.

Not applicable; there has been no issue identified in the production, but rather assembly by third parties.

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.

Thule will provide recall notification to dealers within the next two (2) weeks. It is anticipated that completion of the recall will occur within ninety (90) days.

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

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