

Cottrell, Inc.

November 21, 2007

RECEIVED  
2007 DEC. - 3 AM 9:00  
DEFECTS INVESTIGATION  
RECALL MGMT DIV.

07V-548  
(7 Pages)

**VIA E-MAIL TO PAT WALLACE** ([patricia.wallace@dot.gov](mailto:patricia.wallace@dot.gov))

Ms. Patricia Wallace  
Office of Administrator for Enforcement (NVS-200)  
National Highway Traffic Safety Administration  
400 7<sup>th</sup> Street, SW  
Washington, DC 20590

Re: Recall of Cottrell 8-Car Enclosed Units

Dear Ms. Wallace:

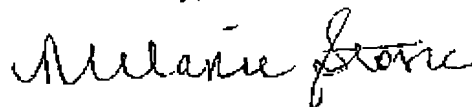
Please find enclosed Cottrell's Part 573 Defect Report related to the recall of Cottrell 8-car enclosed equipment. I understand from my prior experience with similar recalls that because we have already contacted 100% of the customers with units at issue, no "official" owner notification letter should be necessary. As a result, we are not submitting a draft owner notification letter or draft notification envelope with our 573 Report. I also understand that NHTSA has discontinued its monthly recall news release, so we are not submitting a request for exemption as we would otherwise do.

We will provide updates as additional information becomes available or, at a minimum, in quarterly intervals as required by NHTSA. In the interim, please do not hesitate to call me with any questions you might have.

If I am misunderstanding in any way our obligations with respect to this recall, please let me know and I will do whatever is necessary to rectify that situation immediately.

Thank you very much for your assistance.

Sincerely,



Melanie S. Stone



2125 Candler Road  
Gainesville, GA 30507  
(770) 532-7251 Ext. 285  
(770) 532-2294 Direct Fax  
[www.cottrelltrailers.com](http://www.cottrelltrailers.com)

Encl.

## **PART 573 Defect and Noncompliance Reporting**

### **Defect Report**

**Report Date:** November 21, 2007

**1. Vehicles affected are manufactured by:**

Cottrell, Inc.  
2125 Candler Road  
Gainesville, GA 30507

**2. The following vehicles are being recalled:**

All Cottrell C-8ENC enclosed car-haul trailers shipped from September 3, 2002 (initial ship date for such units) through July 6, 2007 (date last such unit was produced and placed into the stream of commerce). A repair list of VIN numbers is attached. A total of 68 units are affected, with a single customer owning 67 of those 68 units. Cottrell has already reworked 2 of the affected units.

**3. The total number of vehicles subject to recall:**

68, with 2 having already been reworked as of the date of this notice to NHTSA.

**4. The approximate percentage of vehicles from #3 above estimated to actually be affected:**

Cottrell plans to rework 100% of the subject units manufactured, and has already reworked 2 of the 68 affected units. See attached listing of repairs by VIN. Only 2 customers are affected, with a single customer owning 67 of the 68 units at issue. Cottrell has already contacted both customers and is working with those customers on a plan to rework all of the affected units.

**5. Description of the defect:**

The subject vehicles are enclosed car-haul trailers that are equipped with roofs that raise and lower. The roofs are attached to a raising/lowering mechanism by round tubes that are welded to the roof. There are 4 tubes welded to each roof and 2 roofs per each complete piece of equipment. Investigation has shown that the base material around the welded connection may experience a fatigue failure during high mileage operation. Should that occur on all four lift points, the roof might separate from the trailer. (See photographs below for a picture of the vehicle at issue and a close-up indicating the general location of the roof lift points).

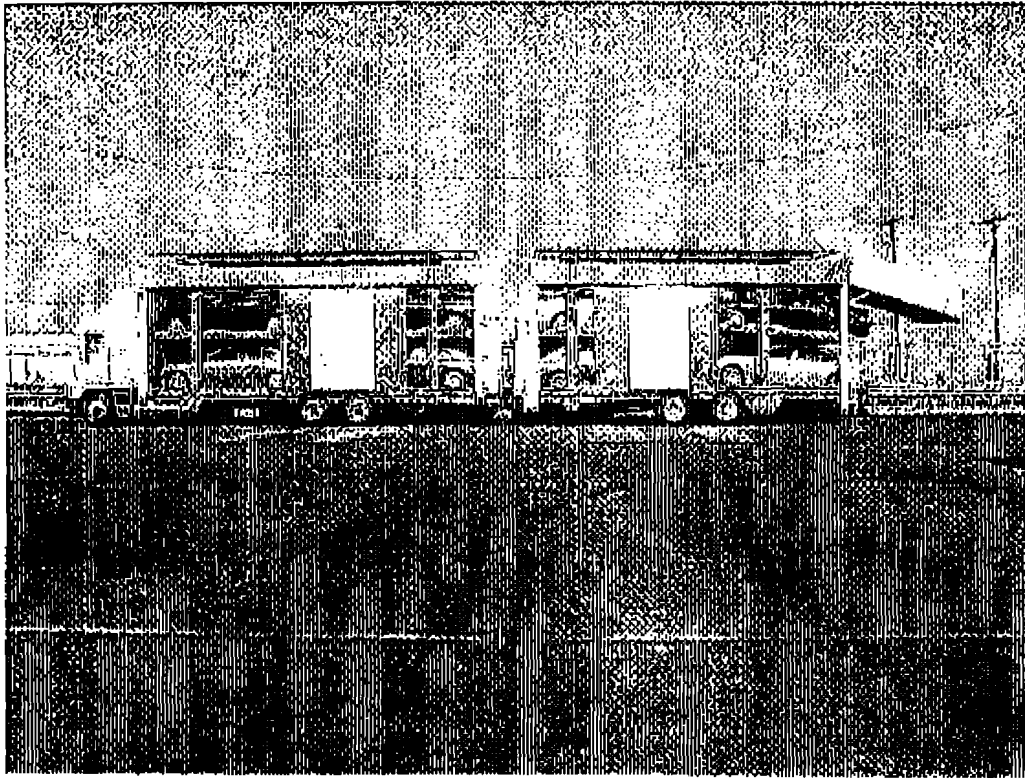


Figure 1: Overall picture of vehicle.

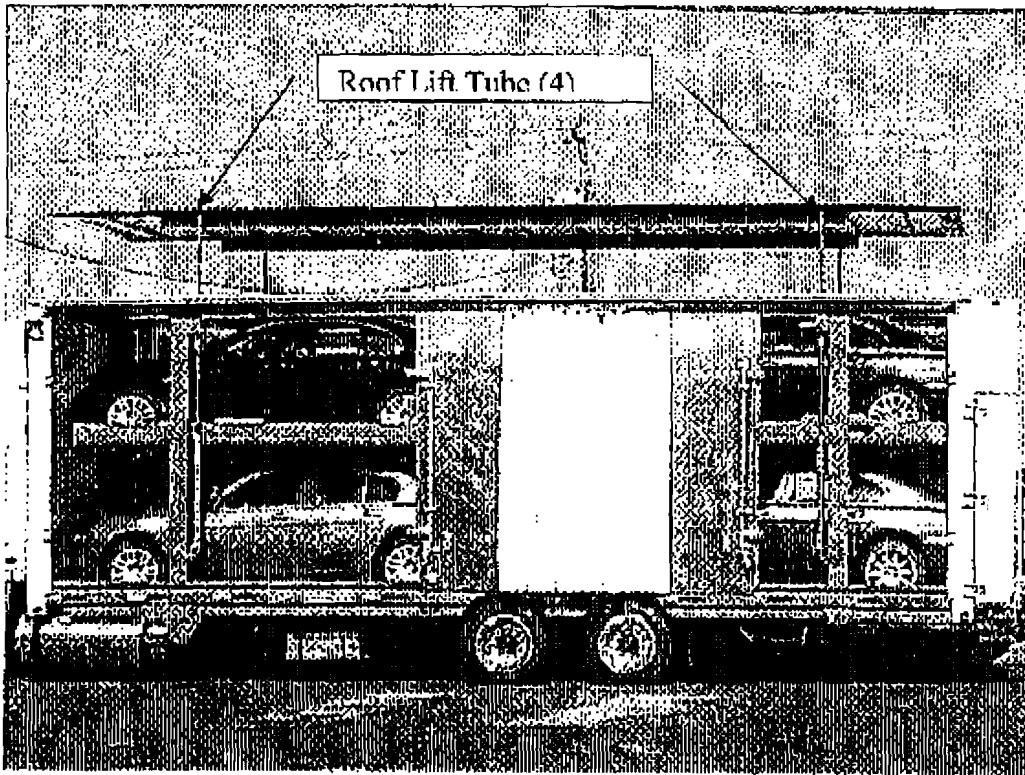


Figure 2: Close up indicating roof lift points

**6. The following data is the basis for the determination to recall these vehicles:**

- a. 10/26/2007- Customer notified Cottrell that a roof had blown off in high winds. Customer was going to send the unit into Cottrell for our review.
- b. 10/31/2007- Unit arrived at Cottrell. Parts removed and analysis initiated.
- c. 11/02/2007 –Component parts sent out to a 3<sup>rd</sup> party lab to determine failure mode.
- d. 11/02/2007 through 11/09/2007 ran computer simulations to try and recreate failure and identify possible repairs.
- e. 11/13/07 Test lab reported orally the opinion that the failure mode appeared to be directly related to fatigue.
- f. 11/15/07 Met internally to discuss oral test lab report and related plan of action. Determined that a potential motor vehicle safety issue may exist, and that such vehicles should be recalled.

**7. The remedy consists of 3 steps as follows:**

- a. Add an additional weld pass around the roof lift tube.
- b. Install an inner gusset tying the roof into the roof lift tube.
- c. Install an outer gusset tying the roof into the roof lift tube

Note: the above repairs are performed on all 4 corners of the headramp and the trailer. See attached reinforcement installation drawing for more detailed information.

**8. Notification:**

Sixty-eight (68) units are at issue, with 67 of the 68 units belonging to one customer. A second customer owns one unit that is affected. Once it was determined that a safety issue existed, Cottrell immediately contacted both customers involved. Cottrell has already reworked two of the subject units. See attached list of repairs by VIN. We understand from our past experience with your office that no "official" owner notification letter is necessary under these circumstances.

**9. Cottrell will use the identification number assigned by NHTSA for this recall.**

**10. Questions regarding this recall should be directed to:**

- a. Melanie Stone  
Cottrell, Inc.  
2125 Candler Road  
Gainesville, GA 30507  
(770) 532-7251, ext. 285

Or, if not available, then to:

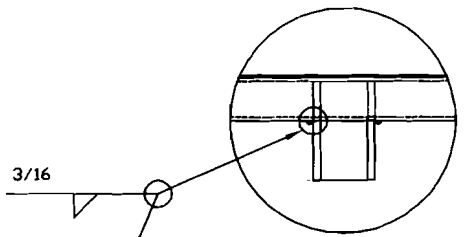
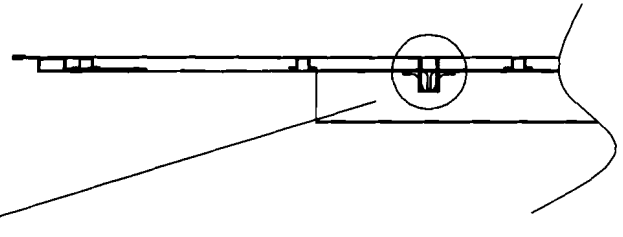
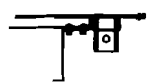
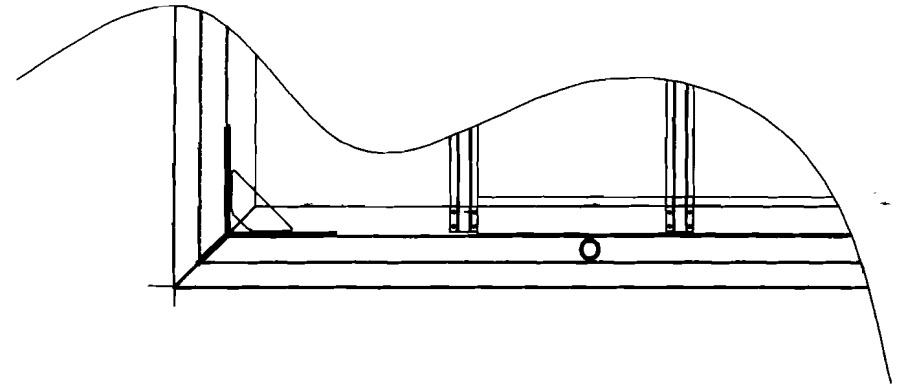
b. Bryan Howes  
Cottrell, Inc.  
2125 Candler Road  
Gainesville, GA 30507  
(770) 532-7251, ext. 258

Report Submitted by Melanie Stone  
Melanie Stone, Cottrell, Inc.

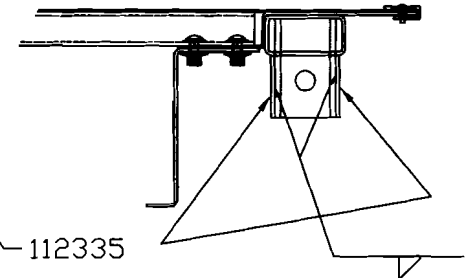
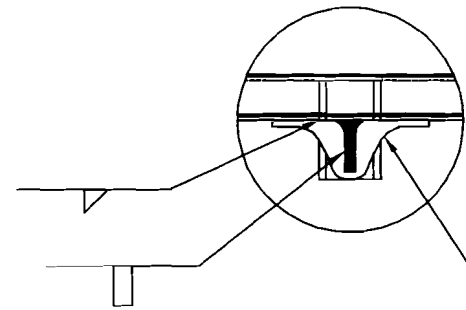
ECO NUMBER	ZONE	REV	REVISION-DESCRIPTION	DATE	BY	CHECKED

NOTES:

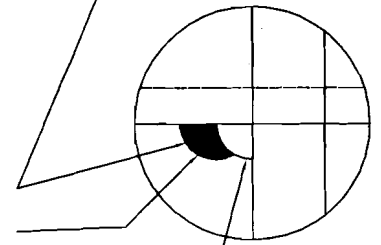
1. PREPARE SURFACES FOR WELDING.
2. MAKE ANOTHER WELD PASS AROUND PIPE, USING E7018 ELECTRODE MINIMUM
3. ADD 112335 ON INSIDE OF PIPE AND WELD AS SHOWN THEN WELD OUTSIDE PLATE AS SHOWN.
4. PRIME AND PAINT SURFACES.
5. REPEAT INSTALLATION FOR ALL ROOF LIFT POINTS ON HEADRAMP AND TRAILER. (8 LIFT POINTS TOTAL)



PLACE ANOTHER WELD PASS AROUND PIPE



112335



New weld pass

Original weld

	DESIGN BY	PRICE REL	INITIAL	INITIAL DESCRIPTION		
	DST	-	-	-	-	-
DESIGN DATE	PRICE BY	MAKE FIRM	MAKE FIRM	PART WELD	SIMILAR TO	SCALE
11/9/2007	-	-	-	-	-	1:1
CHK BY	PRICE DATE	FINISH	FINISH	NEWSP	SWS REL	SIZE
-	-	-	-	-	-	C
CHK DATE	TITLE				PART REL	REV
-	ROOF REINFORCEMENT				112357	IR
						1

#	Trailer VIN	Date Completed
1	5E0A114403G	11/8/2007
2	5E0A114403G	
3	5E0A114403G	
4	5E0A114423G	11/2/2007
5	5E0A114423G	
6	5E0A114423G	
7	5E0A114423G	
8	5E0A114423G	
9	5E0A114423G	
10	5E0A114443G	
11	5E0A114443G	
12	5E0A114443G	
13	5E0A114443G	
14	5E0A114443G	
15	5E0A114453G	
16	5E0A114463G	
17	5E0A114463G	
18	5E0A114463G	
19	5E0A114463G	
20	5E0A114463G	
21	5E0A114473G	
22	5E0A114473G	
23	5E0A114483G	
24	5E0A114483G	
25	5E0A114483G	
26	5E0A114483G	
27	5E0A114493G	
28	5E0A114493G	
29	5E0A114493G	
30	5E0A1144X3G	
31	5E0A1144X3G	
32	5E0A1144X3G	
33	5E0A914404C	
34	5E0A914404C	

#	Trailer VIN	Date Completed
35	5E0A914404G	
36	5E0A914414G	
37	5E0A914414G	
38	5E0A914424G	
39	5E0A914424G	
40	5E0A914424G	
41	5E0A914434G	
42	5E0A914444G	
43	5E0A914444C	
44	5E0A914454C	
45	5E0A914454C	
46	5E0A914454C	
47	5E0A914455C	
48	5E0A914464C	
49	5E0A914464C	
50	5E0A914464C	
51	5E0A914474C	
52	5E0A914474C	
53	5E0A914474G	
54	5E0A914484G	
55	5E0A914484G	
56	5E0A914484G	
57	5E0A914484G	
58	5E0A914484G	
59	5E0A914494G	
60	5E0A914494G	
61	5E0A914494G	
62	5E0A914494G	
63	5E0A9144X4G	
64	5E0A9144X4G	
65	5E0A9144X4G	
66	5E0A9144X4G	
67	5E0A9144X4G	
68	5E0AC14467G	