

September 26, 2008

BY U.S. MAIL (CERTIFIED)

Associate Administrator for Enforcement
National Highway Traffic Safety
Administration
Attention: Recall Management Division
(NVS-215)
1200 New Jersey Avenue, SE
Washington, D.C. 20590

**08V-514
(19 pages)**

Re: Ox Bodies, Inc.

Dear Sir or Madam:

Our client, Ox Bodies, Inc. hereby notifies the National Highway Traffic Safety Administration of a determination of a potential defect, and Ox's intention to recall and modify approximately 214 medium-to-heavy duty trucks for which Ox was the final stage manufacturer.¹ The modifications will be at Ox's own cost.

As described in the attached report, all the vehicles were sold by one dealer (Peach State Truck Centers, Inc.) to one corporate family (Dycom Industries, Inc. and its affiliates). The Owner has confirmed that none of the vehicles have been sold, leased or otherwise transferred to any third party, and that there is no intention to do so.

When requested by a customer, Ox fabricates and installs toolboxes on trucks during the body manufacturing process. Normally, Ox toolboxes have lids designed to enable opening to a 90-degree angle. The lids are attached by twin hinges and chains. At the request of the customer here, Ox fabricated and installed lids for that could be opened to a 180-degree angle on the affected trucks. This custom design was achieved by fabricating lids attached with hinges but without chains.

The Owner has advised that the toolbox lid on one vehicle detached and fell to the ground while the truck was traveling. After falling, the lid purportedly struck a vehicle traveling behind causing property damage to that vehicle. The incident did not involve any injury to any person.

¹ Ox is currently confirming the total number of vehicles.

Since learning of the incident, the Company and the dealer have been working closely with the Owner to expeditiously modify the toolbox lids on each of the trucks. The modifications include affixing the toolbox lids with hinges of stronger durability and with a greater number of hinges. Support chains are also being added for additional safety. To date, the Company has already modified 35 of the 216 vehicles, and 8 additional modifications are already scheduled.

It is not entirely clear there is a safety-related defect, and the process could be viewed as a formality because the affected parties are already aware of the problem and the modifications are already in progress. Nevertheless, in an abundance of caution the Company also submits the attached report and plans to send out a notice of recall as described in the report. The Company likewise intends to submit any required quarterly reports regarding the progress of the campaign.

Please feel free to contact us if you have any questions.

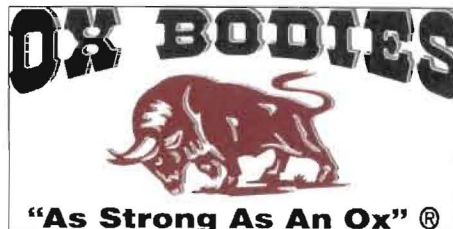
Very truly yours,



Troy W. Garris

cc: Jerry Frost

RRR# 7006 2150 0000 7403 2762



September 26, 2008

By Certified Mail

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Potential Defect Information Report

Dear Sir or Madam:

In accordance with 49 C.F.R. 573.6, Ox Bodies, Inc. ("Company") notifies the National Highway Traffic Safety Administration ("NHTSA") that it has made a determination of a possible defect related to motor vehicle safety existing in certain toolbox lids that Company fabricated and installed on approximately 214 trucks for which Company was the final stage manufacturer.¹

The Company is a final stage manufacturer that fabricates and installs truck bodies on incomplete vehicles. Frequently, as here, the vehicles are sold to end-users by truck dealerships with which the Company has a relationship. When requested by the customer, the Company fabricates and installs toolboxes on the vehicles during the body manufacturing process. Normally, each toolbox has a lid designed to enable the toolbox to be opened up to a 90-degree angle. The lids are attached to the toolboxes by hinges and chains. At the request of an end-user, Dycom Industries, Inc. and its affiliates (together, "Owner"), the Company has fabricated and installed lids for Owner that could be opened to a 180-degree angle for certain medium-to-heavy duty trucks. This custom design was achieved by fabricating lids attached with hinges but without chains. The vehicles were then sold to Owner by a local dealer, Peach State Truck Centers, Inc. The Owner has confirmed that none of the vehicles in the Subject Population (defined below) have been sold, leased or otherwise transferred to any third party, and that there is no intention to do so.

¹ The Company is currently confirming the total number of vehicles.

Recently, the Company was advised of an incident (“Incident”) in which one of the specialized toolbox lids on one of the vehicles sold to Owner (“Subject Vehicle”) detached and fell to the ground while the vehicle was traveling. The lid purportedly struck a vehicle traveling behind the Subject Vehicle causing property damage to that other vehicle. The Incident did not involve any injury to any person.

Since learning of the Incident, the Company, the dealer that sold the vehicles and Owner have been working closely together in order to expeditiously and appropriately modify each vehicle affected in a manner that is both safe and suitable for this very important customer for Company.

Although it is not entirely clear there is a safety-related defect in the toolbox lids, in an abundance of caution, and to address any concerns of NHTSA and the Company’s customers and business acquaintances, the Company voluntarily has commenced a customer satisfaction campaign to inspect and change the design of each toolbox lid designed in this manner (“Subject Population”). (A list of full or partial VIN Numbers for each vehicle in the Subject Population is included as Attachment A hereto.)² Owner is already fully aware of the incident, and to maximize safety and the speed of remedial modifications, the Company has already begun performing inspections and making the modifications at the Company’s own cost. At this stage, the modifications have already been made to approximately 35 of the toolboxes in the Subject Population. Modifications on the toolbox lids for an additional approximately 8 vehicles have already been scheduled for modification.

For regulatory compliance purposes, and in an abundance of caution, Company also provides the information in Attachment B, and proposes to send out the letters in Attachment C once approved by your office.

The Company likewise will submit quarterly reports regarding the progress of the campaign in a format consistent with 49 C.F.R. § 573.7.

Very truly yours,

Jerry Frost
Ox Bodies, Inc.

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² The VIN number list was received from the Owner.

ATTACHMENT A
VIN Numbers in Subject Population

1.	3FRXF75S67V	
2.	3FRXF75S67V	
3.	3FRXF75P27V	
4.	3FRXF75PX7V	
5.	3FRXF75P67V	
6.	3FRXF75PX7V	
7.	3FRXF75S87V	
8.	3FRXF75S77V	
9.	3FRXF75S87V	
10.	3FRXF75S77V	
11.	3FRXF75S27V	
12.	3FRXF75P47V	
13.	3FRXF75P47V	
14.	3FRXF75P95Y	
15.	3FRXF75S32V	
16.	3FRXF75S37V	
17.	3FRXF75S87V	
18.	3FRXF75S97V	
19.	3FRXF75S07V	
20.	3FRXF75PX7V	
21.	3FRXF75P67V	
22.	3FRXF75P96V	
23.	3FRXF75P06V	
24.	3FRXF75S07V	
25.	3FRXF75S27V	
26.	3FRXF75S77V	
27.	3FRXF75P36V	
28.	3FRXF75P76V	
29.	3FRXF75P27V	
30.	3FRXF75P37V	
31.	3FRXF75S47V	
32.	3FRXF75S07V	
33.	3FRXF75S67V	
34.	3FRXF75S97V	
35.	3FRXF75S07V	
36.	3FRXF75S97V	
37.	3FRXF75S77V	
38.	3FRXF75S87V	

39. 3FRXF75S7V	
40. 3FRXF75S57V	
41. 3FRXF75S17V	
42. 3FRXF75P17V	
43. 3FRXF75P47V	
44. 3FRXF75S67V	
45. 3FRXF75S97V	
46. 3FRXF75S37V	
47. 3FRXF75S47V	
48. 3FRXF75P07V	
49. 2FZHATDA97A	
50. 3FRXF75PX6V	
51. 3FRXF75P37V	
52. 3FRXF75P77V	
53. 3FRXF75P57V	
54. 3FRXF75S37V	
55. 3FRXF75S47V	
56. 3FRXF75P16V	
57. 3FRXF75S67V	
58. 3FRXF75S57V	
59. 3FRXF75P17V	
60. 3FRXF75P97V	
61. 3FRXF75S47V	
62. 3FRXF75P57V	
63. 3FRXF75P16V	
64. 3FRXF75P57V	
65. 3FRXF75P76V	
66. 3FRXF75P97V	
67. 3FRXF75S37V	
68. 3FRXF75P67V	
69. 3FRXF75S05V	
70. 3FRXF75S45V	
71. 3FRXF75P25V	
72. 3FRXF75P36V	
73. 3FRXF75PX6V	
74. 3FRXF75P86V	
75. 3FRXF75P16V	
76. 3FRXF75P16V	
77. 3FRXF75P76V	

78.	3FRXF75P16V	
79.	3FRXF75P76V	
80.	3FRXF75P96V	
81.	3FRXF75P06V	
82.	3FRXF75P86V	
83.	3FRXF75P36V	
84.	3FRXF75P56V	
85.	3FRXF75P36V	
86.	3FRXF75P56V	
87.	3FRXF75P76V	
88.	3FRXF75PX6V	
89.	3FRXF75P26V	
90.	3FRXF75P76V	
91.	3FRXF75P96V	
92.	3FRXF75S97V	
93.	3FRXF75S57V	
94.	3FRXF75S77V	
95.	3FRXF75P67V	
96.	3FRXF75P66V	
97.	3FRXF75P16V	
98.	3FRXF75P16V	
99.	3FRXF75P86V	
100.	3FRXF75P77V	
101.	3FRXF75P67V	
102.	3FRXF75P57V	
103.	3FRXF75P66V	
104.	3FRXF75P87V	
105.	3FRXF75S77V	
106.	3FRXF75P87V	
107.	3FRXF75PX7V	
108.	3FRXF75P76V	
109.	3FRXF75P96V	
110.	3FRXF75P56V	
111.	3FRXF75P37V	
112.	3FRXF75P26V	
113.	3FRXF75P96V	
114.	3FRXF75P06V	
115.	3FRXF75P66V	
116.	3FRXF75P57V	

- 117. 5V
- 118. 5V
- 119. 5V
- 120. 5V
- 121. 5V
- 122. 5V
- 123. 5V
- 124. 5V
- 125. 5V
- 126. 5V
- 127. 5V
- 128. 5V
- 129. 5V
- 130. 5V
- 131. 5V
- 132. 5V
- 133. 5V
- 134. 5V
- 135. 5V
- 136. 5V
- 137. 5V
- 138. 5V
- 139. 5V
- 140. 5V
- 141. 5V
- 142. 6V
- 143. 6V
- 144. 6V
- 145. 6V
- 146. 6V
- 147. 6V
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- 149. 6V
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162. 6V
163. 6V
164. 6V
165. 6V
166. 7V
167. 7V
168. 7V
169. 7V
170. 7V
171. 7V
172. 7V
173. 7V
174. 7V
175. 7V
176. 7V
177. 7V
178. 7V
179. 7V
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181. 7V
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184. 7V
185. 7V
186. 7V
187. 7V
188. 7V
189. 7V
190. 7V
191. 7V
192. 7V
193. 7V
194. 6V
195. 7V
196. 6V
197. 6V
198. 6V

199.	6V
200.	6V
201.	6V
202.	6V
203.	7V
204.	6V
205.	6V
206.	6V
207.	6V
208.	6V
209.	6V
210.	6V
211.	6V
212.	7V
213.	7V
214.	6V

ATTACHMENT B
573.6 Information

1. 573.6(c)(1) – Manufacturer’s Name.

Ox Bodies, Inc.

2. 573.6(c)(2) – Identification of Vehicles or Items of Equipment.

The items of equipment in the Subject Population consist solely of toolbox lids that Company fabricated and installed on vehicles that Company manufactured for Owner. These lids were specially fabricated at Owner’s particularized request to enable the toolboxes to open to a 180-degree angle. This custom design was achieved by modifying Company’s standard design and attaching lids with twin hinges but no support chains.

The Subject Population does not include toolbox lids fabricated and installed for anyone other than Owner. The Company’s standard toolbox lids open only 90 degrees and are supported by twin hinges and chains. The Company has been fabricating such toolbox lids for many years and has not been advised of a defect occurring in Company’s standard design.

3. 573.6(c)(2)(iii) – Generic Identification of Item of Equipment.

Subject Population consists of toolbox lids specially modified at the request of Owner, and fabricated to open to a 180-degree angle. These toolbox lids were attached with twin hinges but without support chains.

4. 573.6(c)(2)(v) – Identification of Vehicles or Items of Equipment.

No manufacturer purchased the toolbox lids for use or installation in new motor vehicles or new items of motor vehicle equipment. The lids were fabricated and installed by the Company, which itself was the final-stage manufacturer of the vehicles containing the modified toolbox lids.

5. 573.6(c)(3) – Number of Vehicles or Items of Equipment.

The Subject Population consists solely of toolbox lids fabricated and installed by the Company on approximately 214 medium-to-heavy duty trucks for which the Company was the final-stage manufacturer and Owner was the purchaser. The Owner has confirmed that none of the vehicles in the Subject Population have been sold, leased or otherwise transferred to any third party, and that there is no intention to do so.

6. 573.6(c)(4) – Estimated Percentage of Vehicles or Items of Equipment Containing Defect.

The Company believes that all 214 trucks sold to Owner were specially ordered to contain this type of custom toolbox lid design.

7. 573.6(c)(5) – Description.

The toolbox lids in the Subject Population are all attached to toolboxes permanently affixed to the beds of the medium-to-heavy duty trucks sold to Owner. The lids were specially fabricated at Owner's request to enable the lids to open to a 180-degree angle. This custom design was achieved by modifying Company's standard design, attaching lids with twin hinges but no support chains. This design put additional stress on the hinges when used in extreme service. Over time, such use could cause one or both hinges to fail and, upon failure, the lid could detach from the toolbox.

8. 573.6(c)(6) – Basis for Determination.

On or about July 14, 2008, the Incident occurred in which the toolbox lid on the Subject Vehicle allegedly became detached, fell to the ground and struck the vehicle traveling in the rear.

By letter dated August 12, 2008, Owner sent a letter to the Dealer stating in part the following:

Several of our subsidiaries have purchased trucks and truck bodies from Peach State Truck Centers. Earlier this week you were notified that a door fell off a Peach State provided vehicle owned by Star³] due to a hinge failure which resulted in a vehicle accident.

We expect Peach State to fully indemnify Star for all costs and expenses, including attorney fees, if any, resulting from the accident. Furthermore, Peach State must immediately inspect all trucks and bodies that may have the same issues for our subsidiaries and implement remedial safety measures to ensure no similar incident occurs in the future.

The same date, the Dealer forwarded the letter to the Company with a demand for immediate action.

The Company promptly thereafter began an investigation of the alleged problem, and requested its on-staff engineer to inspect the design of the toolbox lids. The Company began to collect relevant information to determine whether a problem

³ Star Construction, LLC is one of Dycom Industries, Inc.'s affiliates.

existed, and the nature of that problem if any. The Company also contacted Owner to arrange for prompt field inspections and modifications at Owner's convenience.

The Company's internal investigation revealed that the custom design used in fabricating the toolbox lids in the Subject Population to owner's specifications created additional stress on the twin hinges. The lack of chains also created additional stress. As a result, the Company decided that it was possible that extreme use over time could cause one or both hinges to fail and, upon failure, the lid could detach from the toolbox.

In consultations with legal counsel regarding NHTSA requirements, the Company has now determined that, while still somewhat unclear, it is possible that a defect related to motor vehicle safety exists in the Subject Population and that this report should therefore be sent to NHTSA.

9. 573.6(c)(8)(i) – Remedy Program.

The Company is in direct contact with Owner, and will modify each toolbox lid in the Subject Population at the Company's expense. The Company's remedial program will include a plan for reimbursing Owner for costs incurred by Owner in remedying the problem in advance of the Company's notice to owners, purchasers and dealers, in accordance with 49 C.F.R. 573.13.

The program includes replacing the existing hinges with hinges of stronger durability and with a greater number of hinges. Support chains are being added for additional safety.

As of the date of this submission, approximately 35 of the toolbox lids in the Subject Population have already been modified at the Company's expense. An additional approximately 8 vehicles have been formally scheduled for modification.

10. 573.6(c)(8)(ii) – Estimated Date for Notification.

Owner is already fully aware of the potential defect. In addition, the Company is already modifying the toolbox lids at the Company's own cost. The Company is also working closely together with Owner to schedule these modifications at Owner's convenience.

Nevertheless, the Company plans to send the regulatory notification to Owner on or about October 3, 2008.

ATTACHMENT C
Proposed Letters to Owners, Dealers and Distributors

[OX BODIES, INC. LETTERHEAD]

[Date]

[Owner Address]

Dear [Owner]:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Ox Bodies, Inc. ("Company") has decided that a defect that relates to motor vehicle safety exists in certain toolbox lids fabricated and installed by the Company in certain trucks for which the Company was the final-stage manufacture during the period from October 2004 to January 2008. This decision is based on an incident in which a toolbox lid detached from a moving vehicle, fell to the ground and struck a vehicle in the rear causing **property damage**. (A list of the VIN numbers for the affected vehicles is enclosed.)

Description: When the Company fabricated and installed the toolbox lids on your vehicles, the Company modified its normal design. Normally, each toolbox has a lid designed to enable the toolbox to be opened up to a 90-degree angle. The lids are attached to the toolboxes by hinges and chains. In your vehicles, pursuant to your request, the Company fabricated and installed lids for the trucks opening up to a 180-degree angle. This custom design was achieved by fabricating lids attached with hinges and without chains. Based on the information received, it appears that the toolbox lid detached from the vehicle in the incident described above because the hinges on the modified lid failed. It is possible that the hinges on your other units could similarly fail, causing the toolbox lid to become detached. Depending on the circumstances and timing of any such detachment, the lid could cause **injury** to property or persons without warning.

Remedy: At no charge to you, the Company will replace the hinges on the toolbox lids on your vehicles with hinges that are of stronger durability and with a greater number of hinges. In addition, support chains will be added for additional safety. If you have made these modifications prior to receipt of this letter, Company will provide reimbursement for the reasonable and necessary cost of such modifications.

What You Need to Do: To schedule the cost-free modification, you should contact the Warranty Department at Ox Bodies, Inc.'s facilities in Fayette, Alabama (205/932-5720). If it not feasible for you to bring the vehicle to Ox's facilities directly, Ox can make alternative arrangements for a cost-free repair at one of the 34 authorized locations indicated on the enclosed list.

Service Problem Help: If our service department is unable to provide assistance to complete the modification, free of charge, within a reasonable time, please call or write to our main office at the above address. If the Company fails or is unable to perform the modifications within 60 days after you tender the vehicle for modification, complaint may be made to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, SE, Washington, D.C. 20590, call the toll free Vehicle Safety Hotline at 888-327-4236 (TTY: 800-424-9153), or go to <http://www.safercar.gov>.

Service Advisory: Until the trucks are modified as described above, you should visually inspect the toolbox lid each time before driving the truck. If you notice any problem with a hinge the truck should not be driven until the lid can be firmly secured. In addition, users should refrain from any overly rough or abusive use of the lid.

Thank you for using Ox Bodies. If you have any questions, please feel free to call us at (205) 932-5720.

Very truly yours,

[OX BODIES, INC. LETTERHEAD]

[Date]

[Dealer/Distributor Address]

Dear [Dealer/Distributor]:

Ox Bodies, Inc. ("Company") has decided that a defect that relates to motor vehicle safety exists in certain toolbox lids fabricated and installed by the Company in certain trucks for which the Company was the final-stage manufacture during the period from October 2004 to January 2008. This decision is based on an incident in which a toolbox lid detached from a moving vehicle, fell to the ground and struck a vehicle in the rear causing property damage. (A list of the VIN numbers for the affected vehicles is enclosed.)

Description: When the Company fabricated and installed the toolbox lids on these vehicles, the Company modified its normal design. Normally, each toolbox has a lid designed to enable the toolbox to be opened up to a 90-degree angle. The lids are attached to the toolboxes by hinges and chains. In these vehicles, pursuant to customer request, the Company fabricated and installed lids for the trucks opening up to a 180-degree angle. This custom design was achieved by fabricating lids attached with hinges and without chains. Based on the information received, it appears that the toolbox lid detached from the vehicle in the incident described above because the hinges on the modified lid failed. It is possible that the hinges on your other units could similarly fail, causing the toolbox lid to become detached. Depending on the circumstances and timing of any such detachment, the lid could cause injury to property or persons without warning.

Remedy: At no charge to the customer, the Company will replace the hinges on the toolbox lids on the vehicles with hinges that are of stronger durability and with a greater number of hinges. In addition, support chains will be added for additional safety. If the customer has made these modifications prior to receipt of this letter, Company will provide reimbursement for the reasonable and necessary cost of such modifications in accordance with regulatory requirements.

What Customers Need to Do: To schedule the cost-free modification, the customer should contact the Warranty Department at Ox Bodies, Inc.'s facilities in Fayette, Alabama (205/932-5720). If it not feasible for the customer to bring the vehicle

to Ox's facilities directly, Ox can make alternative arrangements for a cost-free repair at one of the 34 authorized locations indicated on the enclosed list.

Service Problem Help: If our service department is unable to provide assistance to complete the modification, free of charge, within a reasonable time, please call or write to our main office at the above address. If the Company fails or is unable to perform the modifications within 60 days after the customer tenders the vehicle for modification, complaint may be made to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, SE, Washington, D.C. 20590, call the toll free Vehicle Safety Hotline at 888-327-4236 (TTY: 800-424-9153), or go to <http://www.safercar.gov>.

Service Advisory: Until the trucks are modified as described above, the customer should visually inspect the toolbox lid each time before driving the truck. If the user notices any problem with a hinge the truck should not be driven until the lid can be firmly secured. In addition, users should refrain from any overly rough or abusive use of the lid.

Dealer/Distributor Advisory: Dealers and distributors should be aware it is a violation of Federal law for a dealer to deliver a new motor vehicle or any new or used item of motor vehicle equipment covered by the notification under a sale or lease until any defect is remedied.

If you have any questions, please feel free to call us at (205) 932-5720.

Very truly yours,
