



INNOVATIVE TRAILERS, INC.

RECEIVED

2009 FEB 23 A 9:39

February 6, 2008

Administrator of Enforcement
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590

Re: Defect Information Report, in accordance with 49 CFR § 573.6, concerning certain wheel end studs supplied by B&D Thread Rolling and assembled into hubs shipped to Arvin Meritor OEM and Aftermarket customers between April 7, 2008 and May 19, 2008.

NHTSA file: EQ08-013

Dear Sir/Madam:

Innovative Trailers, Inc. submits this Defect Information Report in accordance with 49 CFR § 573.6. The information is presented to correspond to the subparagraphs of section § 573.6(c).

Information Requested under § 573.6(c)(1)

This report is submitted by:

Innovative Moving Floor Trailers, Ltd. dba Innovative Trailers, Inc.
PO Box 6623
Texarkana, TX 75505-6623

Information Requested under § 573.6(c)(2)

The affected motor vehicle equipment are wheel end studs supplied by B&D Thread Rolling, 10555 Haggerty Road, Dearborn, MI 48126 to Arvin Meritor, Inc., 2135 West Maple Road, Troy, MI 48084-7186. Innovative Trailers, Inc. purchased these studs from Arvin Meritor.

Information Requested under § 573.6(c)(3)

Arvin Meritor determined that 4 axles with the faulty wheel studs had been sold to Innovative Trailers, Inc. during the period described earlier.



INNOVATIVE TRAILERS, INC.

Information Requested under § 573.6(c)(4)

Innovative Trailers, Inc. determined that 100% of the above mentioned population of axles purchased from Arvin Meritor did contain the faulty wheel end studs described in the paragraph immediately below.

Information Requested under § 573.6(c)(5)

The suspect wheel end studs were improperly tempered, potentially rendering them brittle and susceptible to fracture. If one wheel stud fractures, the remaining wheel studs are required to carry more load. If left in this loading condition, the remaining wheel studs may also fracture even if they are properly manufactured. The time between initial bolt fracture and subsequent bolt fracture will be dependent on loading and duty cycle and is unpredictable.

Information Requested under § 573.6(c)(6)

- 5/30/08: Arvin Meritor contacts Innovative Trailers, Inc. with the information of the defective wheel end studs and requests response to the situation.
- 5/30/08: Innovative Trailers, Inc. verbally reports back to Arvin Meritor that the axles/faulty studs have been contained in house.
- Wheel Bolt Containment Tracking Sheet was faxed across to Arvin Meritor shortly Thereafter.
- 6/25/08 Innovative Trailers, Inc. receives Defect Information Report from Arvin Meritor.
- 7/2/08 Faulty studs were returned to Arvin Meritor

Information Requested under § 573.6(c)(7)

No issues exist for non-compliance with a motor vehicle standard. All faulty wheel end studs received from Arvin Meritor were identified and remedied promptly.



INNOVATIVE TRAILERS, INC.

Information Requested under § 573.6(c)(8)

All faulty wheel end studs sold to Innovative Trailers, Inc. by Arvin Meritor were contained at our location and were never distributed to any of our customers for end use. The 4 axles were identified in our shop and were repaired as per Arvin Meritor's instructions. The Wheel Bolt Containment Tracking Sheet provided to Arvin Meritor details the axle information and location in-house at the time of containment. Please see the attached document.

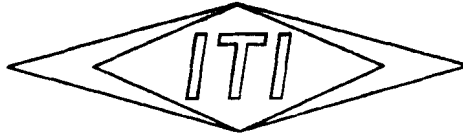
We trust that the information provided in this document is fully responsive to the requirements of 49 CFR § 573.5. All additions or modifications to any of the information given will be reported promptly to NHTSA. Any questions with respect to the information provided should be directed to the undersigned.

Respectfully submitted,

Innovative Trailers, Inc.

Ronnie Gibson
Purchasing Manager

Enclosures
Wheel Bolt Containment Tracking Sheet



INNOVATIVE TRAILERS, INC.

February 6, 2009

Delia Lopez
Department of Transportation

Dear Delia,

In regard to the follow up email received from you on 2-17-09, I am supplying a list of the VIN numbers of the trailers that the axles in question were installed on. As stated before, all axles were corrected prior to shipment to our customers, therefore, no owner letters are necessary.

ITI VIN#	MODEL	YEAR	AXLE SERIAL #
1Z92B45218T199344	SFS-45	2008	FRK00494153
1Z92A42249T199038	SDS-42	2009	FRK00494154
1Z92B45288T199339	SFS-45	2008	FRK00494155
1Z92A45208T199340	SDS-45	2008	FRK00494156

I hope this completes the recall process. Please let me know if there is any other information that we need to supply.

Sincerely,

Missy Wornick
Administrator

WHEEL BOLT CONTAINMENT TRACKING SHEET

CUSTOMER:

Innovative Trailers Inc

CONTAINMENT BY:

2 Axles Separated / 2 trailer chassis identified

LOCATION:

Texas Kings Tx 75501

CONTAINMENT DATE:

5-30-08

VIN #	Mileage	AXLE SERIAL #	# of Bolts from NC -11 Lot (which are changed out)	Curb side		Driver side		Drive side	Loose axle OR on vehicle	NOTES:
				Front	Rear	front	rear			
Axle Loose	0	FRK D0494153	✓						Loose	
Axle Loose	0	" 154	✓						Loose	
1Z3ABY588T91339	0	" 155	✓						iv P.d. → Chassis in house	
1Z3ABY5208T99340	0	" 156	✓						iv P.d. → Chassis in house	

5x#