

**Safety Defect and Noncompliance Report Guide for Vehicles**  
**PART 573 Defect and Noncompliance Responsibility and Report**

On June 9, 2009, Central Purchasing, LLC ("CP") decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. 110.) exists in the motor vehicles manufactured by Long Chih ("MFR") and listed below, and is furnishing notification to the National Highway Traffic Safety Administration ("NHTSA") in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility Reports. Most of the information supplied in this notification is based directly upon information supplied by MFR to NHTSA. CP understands that MFR is cooperating with NHTSA and taking all required actions necessary to satisfactorily resolve and complete the recall described herein.

Date this report was prepared: June 9, 2009  
Furnish the manufacturer's identification code for this recall (if applicable): \_\_\_\_\_

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and of the designated agent as prescribed by 49 U.S.C. §30164.

Central Purchasing, LLC  
3491 Mission Oaks Blvd.  
Camarillo, CA 93012

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

Mark Alexanian, Associate Counsel  
Telephone Number: 805-388-1000.x4555 Fax Number: 805-445-4902  
Name and Title of Person who prepared this report.

Mark Alexanian  
Associate Counsel

Signed: 

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OFFICE OF THE ATTORNEY GENERAL

**I. Identify the Vehicle Models Involved in the Recall**

**2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle lines (provide illustrations or photographs as necessary to describe the vehicle), provide:**

Make(s):Long Chih Model Years Involved: 2005-2006 Model(s): LCI-852T

Production Dates: Beginning: September 1, 2005 Ending: December 31, 2006

VIN Range: Beginning: 319555 Ending: 355688 (based upon data submitted by MFR)

Vehicle Type: Trailer Body style: \_\_\_\_\_

**Descriptive information which characterizes/distinguishes the recalled vehicles from those mode vehicles not included in the recall:**

\_\_\_\_\_

Make(s):Long Chih Model Years Involved: 2005-2008 Model(s): LCI-880P

Production Dates: Beginning: September 1, 2005 Ending: December 31, 2008

VIN Range: Beginning: 036078 Ending: 044585 (based upon data submitted by MFR)

Vehicle Type: Trailer Body style: \_\_\_\_\_

**Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:**

\_\_\_\_\_

Make(s):Long Chih Model Years Involved: 2005-2007 Model(s): LCI-881G

Production Dates: Beginning: September 1, 2005 Ending: December 31, 2007

VIN Range: Beginning: 021740 Ending: 024121 (based upon data submitted by MFR)

Vehicle Type: Trailer Body style: \_\_\_\_\_

**Descriptive information which characterizes/distinguishes the recalled vehicles from those mode vehicles not included in the recall:**

\_\_\_\_\_

Make(s):Long Chih Model Years Involved: 2005-2006 Model(s): LCI-882G

Production Dates: Beginning: September 1, 2005 Ending: December 31, 2006

VIN Range: Beginning: 002811 Ending: 002981 (based upon data submitted by MFR)

Vehicle Type: Trailer Body style: \_\_\_\_\_

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**Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:**

Make(s):Long Chih Model Years Involved: 2005-2008 Model(s): LCI-958TR

Production Dates: Beginning: September 1, 2005 Ending: December 31, 2008

VIN Range: Beginning: 319555 Ending: 355688 (based upon data submitted by MFR)

Vehicle Type: Trailer Body style: \_\_\_\_\_

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**Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:**

**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 Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles manufactured during that time period.**

All of the trailer identified in this report were missing the tire placard label.

## **II. Identify the Recall Population**

### **3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.**

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially involved</u>
LCI-852T	2005-2006	11,760
LCI-880P	2005-2008	7,200
LCI-881G	2005-2007	354
LCI-882G	2005-2006	431
LCI-958TR	2005-2008	1,053

Total Number Potentially Affected by the Recall: 20,798

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100%

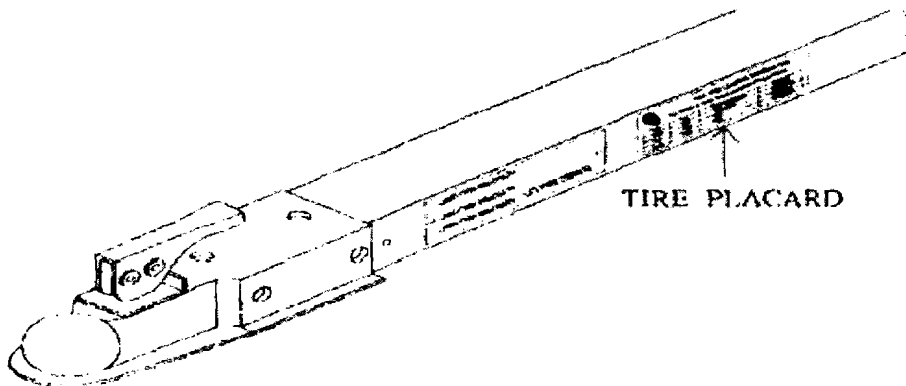
Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

1. All trailers must have a tire placard label to permanently affix on the driver's side of tow bar near VIN plate.
2. Every trailer has a VIN number assigned to MFR's file when the trailer was manufactured
3. Manufacture of recalled trailers is from September 1, 2005 to December 31, 2008.

### 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.

1. MFR's trailer was missing a tire placard label (tire loading information)
2. This tire placard should be permanently affixed to the driver's side of trailer tow bar near the VIN plate.
3. Attached please see the location of the tire placard label as illustration.



MISS a tire placard label.

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

Owners may be confused as to the correct cargo maximum capacity of each trailer subject to this recall although there is an actual statement in the owner's manual.

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

It may cause an over loading.

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

None

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

None

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#### **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.**

**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.**

On 11/25, 2008 the OVSC has information indicating that the trailer identified, which was purchased by a consumer from Northern Tools and Equipment, does not comply with requirement of FMVSS No. 110, Tire selection and rims for motor vehicle with a GVWR of 4.536 kilogram (10,000 pounds) or less and Regulation Parts 575 consumer information regulation. Subsequently, MFR informed the NHTSA that it imported certain numbers of specific trailers to CP. NHTSA thereafter notified CP of the issues.

#### **V. Identify the Remedy**

**8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report NHTSA under this section. If a manufacturer submits one or more general reimbursement plan, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.**

**9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.**

1. MFR's trailer failed to comply with requirement of FMVSS No. 110 between September 1, 2005 to December 31, 2008.

2. MFR shall send a tire placard label to the trailer owner who indicated name, address on the returning warranty registration card to our designated agency and ask owner to permanently affix this label to the driver side of trailer tow bar near VIN plate.

3. MFR shall inform owner that the GVWR and GAWR in VIN plate unit is pounds.

4. MFR shall inform owner that trailer model LCI-830T, LCI-832T, LCI-850T, LCI-851T trailer's GVWR is 1,170 pounds.

5. MFR shall provide "Reporting Safety Defects" statement as a part of owner's manual.

6. MFR will keep some inventory of "tire placard label" and statement sheet at importer for trailer owner once request.

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7. MFR will remedy that noncompliance without charge. \_\_\_\_\_

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

1. Tire placard is a label with viscose showing the tire size, tire pressure and cargo loading weight limited. \_\_\_\_\_
2. "Reporting Safety Defects" is a statement if trailer owner believe that vehicle has a defect which could cause a crash or could cause injury or death, owner should immediately inform the NHTSA. \_\_\_\_\_

**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.**

1. From January 1, 2009, all MFR trailers comply with applicable FMVSS standard. \_\_\_\_\_

#### **VI. Identify the Recall Schedule**

**10. 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.**

1. After final confirmation from its importer, MFR will provide the tire placard label and statement sheet to its designated agency in one month. \_\_\_\_\_
2. MFR will accord returning warranty registration card showing owner's name, address information which was sent to its designated agency then send the tire placard label and statement to owner. \_\_\_\_\_
  - a. First month can complete about 30%. \_\_\_\_\_
  - b. Second month can complete about 30%. \_\_\_\_\_
  - c. The Third month can complete 40%. \_\_\_\_\_

#### **VII. Furnish Recall Communications**

**11. 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) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.**

**Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.**

*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*

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*administration enforcement or litigation against a manufacturer, your response, or statistical summary thereof, may be used in support of the agency's action.*

**LONG CHIH INDUSTRIAL COMPANY LIMITED**

101, Show Shan Road, Shinchuang City, Taipei Hsien, Taiwan, ROC  
Tel: 886-2-29068666 Fax: 886-2-2906-8669 E-mail: longchih@ms31.hinet.net

Dear Customer:

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

Long Chih — trailer manufacturer has decided that all our trailers from 9/1, 2005 to 12/31, 2008 fail to conform to Federal Motor Vehicle Safety Standard No. 110. Tire selection and rims for motor vehicle with a GVWR of 4,536 kilogram (10,000 pounds) or less - doesn't comply with requirement as follow:

1. Missing a tire placard label, which stated the tire size, tire pressure and cargo should not exceed the load carrying weight. And it must be permanently affixed to the driver's side of trailer's tow bar. It will make confusion and emphasize that cargo maximum capacity, although it was stated on owner manual.
2. GVWR of LCI-830T, LCI-832T, LCI-850T, LCI-851T should be 1,170 pounds less instead of 1,180 pound. Because 4.80-8 tire/wheel 4-PR capacity was changed from 590 pound to 585 pound already.
3. The GVWR and GAWR unit should be pounds in VIN plate.
4. Regulation Title 49 Part 575 Consumer information — Should be added a consumer information as "Reporting Safety Defects" as a part of owner's manual. This statement show that if owner believe that your trailer has a defect which could cause a crash or could cause injury or death, you should immediately inform the National Highway Traffic Safety Administration (NHTSA) in addition to notifying Long Chih company.

What are we doing about the problem?

1. Send a tire placard label to trailer owner who indicated name, address on the returning warranty registration card to our designed agent and ask owner to affix this tire placard to the driver's side of trailer tow bar and near VIN plate.
2. Inform owner that the GVWR and GAWR in VIN Plate unit is pounds.
3. Inform owner that trailer model LCI-830T, LCI-832TA, LCI-850T, LCI-851T trailer's GVWR is 1,170 pounds.
4. Provide "Reporting Safety Defects" statement as a part of owner's manual.
5. We will keep some inventory of "tire placard" and statement sheet at your end for trailer owner request
6. We will provide the tire placard label and statement sheet to our designated agency in one month after your final confirmation.
7. Long Chih Company will remedy that noncompliance without charge.

What should you do?

1. Would you please provide all contact owner's information (trailer manufactured from 9/1, 2005 to 12/31, 2008) to us for sending that information as above mentioned if you handle service by yourself or we send the all information to you then you send to the owner.
2. From Jan.1, 2009 all our trailers were corrected this problem already.

We apologize for any inconvenience for this safety problem may cause, but your safety is our concern.

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