

Safety Defect and Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Report¹

On March 22, 2010, Metal Fabrication, Inc. decided that a defect which relates to motor vehicle safety exists 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: March 25, 2010

Furnish the manufacturer's identification code for this recall (if applicable): 62-1482439

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.

Metal Fabrication, Inc. 604 Creasman Drive Winchester, TN 37398

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

Dean A. Samuelson Vice President, Operations

Telephone Number: (253) 770-7600

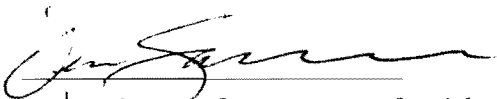
Fax No.: (253) 770-2700

Name and Title of Person who prepared this report.

Dean A. Samuelson

Vice President, Operations

Signed:



¹Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or E-Mail to RMD.ODI@dot.gov.

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:

Make: Metal Fabrication, Inc **Models:** BDTU, BDPY, BDMR, CTT3, CTP3, CTTU, CTKR

Part Number: _____ **Size:** _____

Function: Boat trailers designed to haul recreational boats

Other information which characterizes/distinguishes the items of equipment to be recalled:
Trailer must be equipped with brakes to be subject to recall; Trailer must have been manufactured between September 3, 2009 and January 26, 2010 to be subject to recall. Trailer serial number must be in VIN serial number range (last six digits) 100352 through 101440 to be subject to recall.

Make: _____ **Model:** _____

Part Number: _____ **Size:** _____

Function: _____

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

Make: _____ **Model:** _____

Part Number: _____ **Size:** _____

Function: _____

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

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

II. Identifying the Recall Population

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

Models	Year	Number of Items Potentially Involved
BDTU, BDPY, BDMR, CTT3, CTP3, CTTU, CTKR	2010	382

Total Number Potentially Affected by the Recall: 382

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance: 25%

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: It was discovered that the brake systems were not properly functioning on some Metal Fabrication, Inc. trailers in a distributor's wholesale inventory. Upon inspection, the defect was isolated to a single step in the manufacturing assembly process. The process deficiency was isolated to a single employee that was assigned to this assembly station. The employee worked in that station from September 3, 2009 to January 26, 2010. Therefore, all trailers manufactured in this timeframe have the potential for a defect and are determined to be included in the recall.

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.

The defect is potentially twofold: A. The brake actuator on the tongue of the trailer can have a mis-aligned brake solenoid. If the solenoid is mis-aligned, then there is potential for interference between the solenoid and the actuator housing. This interference could damage to the brake solenoid which may result in leakage of brake fluid. B. The brake system may not have been properly bleed, which may result in air being present in the system, which could cause the brakes to not fully operate when the brake system is engaged.

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

Leakage of brake fluid and/or the presence of air in brake lines may cause the brakes to not operate as intended.

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

The brake system may not operate as intended or may only partially operate as intended.

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

Visible brake fluid leaks, low brake fluid in reservoir and/or softness in brake application

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

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

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.

On January 26, 2010, a distributor notified Metal Fabrication, Inc that certain trailers in their wholesale inventory had brake systems that were not functioning properly. From January 27, 2010 through February 4, 2010, representatives from Metal Fabrication inspected 218 trailers in the distributor's inventory; 147 trailers required no corrective action, 18 trailers were found to have mis-aligned or damaged brake solenoids. 53 trailers had air present in the brake systems. All 71 trailers that required corrective action were corrected on-site during the inspection process.

Representatives from Metal Fabrication conducted an investigation at the factory to determine the cause of the defects. It was determined that an employee had overlooked assembly steps during the assembly of the brake solenoid and the bleeding of the brake systems. Metal Fabrication management reviewed production records and determined that a single employee had performed the assembly work in question and that this employee had been assigned to this assembly position for approximately five months, beginning on September 3, 2009. To date, there have been no reports from any boat dealers or consumers that any Metal Fabrication trailers have had any issue with the brake systems in the field. No warranty claims have been received by Metal Fabrication and no phone calls from dealers or consumers have been received by Metal Fabrication regarding brake systems. The only trailers with known defects were the 28 that were discovered in the specific distributor's wholesale inventory on January 27, 2010 through February 4, 2010.

On March 22, a phone conference was held between members of the management of Metal Fabrication. It was determined that while no additional reports had been received regarding any brake system deficiencies or defects, that Metal Fabrication would initiate actions to inspect and repair if necessary, all trailers manufactured with brake systems during the period of September 3, 2009 and January 26, 2010.

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.

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.

The recall remedy is to: A). Inspect all trailers for visual leakage of brake fluid and to engage the actuator to insure proper brake assembly engagement. If no leakage present and the brakes engage properly, then no further action required. B). If leakage of brake fluid present, then replace the actuator sub-assembly. C). If actuator sub-assembly is replaced, then bleed air from the brake system. D). If brakes do not fully engage when actuated and there is no visible leakage, then bleed air from the brake system. E). After bleeding of air from brake lines, then retest brake system to insure proper engagement of brakes. (see attached inspection, test and remedy procedures).

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

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.

The manufacturing remedy that has been implemented is: A). Developed work instructions for proper assembly of the actuator and the bleeding of air from the brake system. B). Trained all employees involved in the brake system assembly. C). Implemented two separate inspection stations for brake system testing D). Developed tracking system for verification of brake system inspections.

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.

On April 1, 2010 a notification letter will be mailed to all wholesale customers of Metal Fabrication that purchased a trailer with a brake system installed and was manufactured between September 3, 2009 to January 26, 2010. This notification will provide instructions on how to inspect and test the brakes and how to correct any defect if necessary.

On April 1, 2010 a notification letter will be mailed to all consumers that have purchased a trailer from a wholesale customer of Metal Fabrication with a brake system installed and was manufactured between September 3, 2009 to January 26, 2010. This notification will instruct the consumer to return the trailer to their dealer. The dealer will perform an inspection, test the brake system and correct any defect if necessary.

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

Note: These documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.