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10V-237
(7 pages)



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May 25, 2010

VIA FEDERAL EXPRESS

National Highway Traffic Safety Administration
ODI/Recall Management Division – NVS-215
1200 New Jersey Avenue SE
Washington DC 20590

RE: Part 573 Defect and Noncompliance Report

Dear Sir:

On or about May 18, 2010 Big Tex Trailer Manufacturing, Inc. (Big Tex) determined that a defect in a component part not manufactured by Big Tex, which relates to motor vehicle safety, exists. The defective component (underrated 7' ramps) was used with trailers listed below and in the attached "Initial NHTSA Notification, Notice of Proposed Recall of 2010 Big Tex Models 14GX and 14LX Dump Trailers, Limited to Specific Production Runs, Safety Related Defect", and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports. The affected trailers are manufactured by Big Tex Trailer Manufacturing, Inc. under the "Big Tex" brand name and involve Big Tex Models 14GX and 14LX.

Date of Report: May 25, 2010

1. The corporate name and contact of the fabricating manufacturer of the recalled trailers is:

Big Tex Trailer Manufacturing, Inc.
Stan Garrett, Vice President – Finance & Accounting
950 I-30 East
Mt. Pleasant, Texas 75455
(903) 575-0300, Ext. 2194
(903) 577-8858 – facsimile
Email: stang@bigtextrailers.com

2. The corporate name and contact for the fabricating manufacturer of the subject defective component part (underrated 7' ramps) is:

Performance Metal Works, Inc. d/b/a Pro-Form
Royce Patterson -- President
P.O. Box 1338
Winnsboro, Texas 75494-1338
(903) 967-2622 – telephone
(903) 967-2624 – facsimile
proformsales@peoplescom.net

Further information, as required, is included in the attachments to this notification, entitled “Initial NHTSA Notification, Notice of Proposed Recall of Models 14GX and 14LX, Limited to Specific Production Runs, Safety Related Defect”. Drafts of the required notifications to Customers and Dealers are attached.

Sincerely,



Stan Garrett
Vice President – Finance & Accounting

INITIAL NHTSA NOTIFICATION
NOTICE OF PROPOSED RECALL OF MODELS
LIMITED TO SPECIFIC PRODUCTION RUNS
SAFETY RELATED DEFECT

1. **Vehicle Models Involved in Recall:**

- a) **Make(s):** Big Tex (Big Tex Trailer Manufacturing, Inc.)
- b) **Model Years Involved:** 2010
- c) **Model(s):** 14GX and 14LX
- d) **Productions Dates:** Beginning: March 20, 2010 Ending: May 11, 2010
- e) **VIN Range (last 7 digits):**

Model 14GX:	Beginning: 2355051	Ending: 2355056
	Beginning: 2355280	Ending: N/A
	Beginning: 2355287	Ending: 2355288
	Beginning: 2355322	Ending: 2355323
	Beginning: 2355327	Ending: N/A
	Beginning: 2355546	Ending: N/A
	Beginning: 2356965	Ending: N/A
	Beginning: 2357041	Ending: N/A
	Beginning: 2357071	Ending: N/A
	Beginning: 2357261	Ending: 2358066
	Beginning: 2358069	Ending: N/A
	Beginning: 2358350	Ending: N/A
	Beginning: 2358401	Ending: 2358403
	Beginning: 2359139	Ending: 2359140
	Beginning: 2359719	Ending: 2359720
	Beginning: 2359771	Ending: 2359774

Model 14LX:	Beginning: 2355414	Ending: 2355445
	Beginning: 2356795	Ending: 2356788
	Beginning: 2356917	Ending: 2356931
	Beginning: 2356938	Ending: 2356945
	Beginning: 2357377	Ending: 2357381
	Beginning: 2357676	Ending: 2357692
	Beginning: 2357694	Ending: 2357695
	Beginning: 2357861	Ending: N/A
	Beginning: 2357879	Ending: N/A

Beginning: 2357903	Ending: 2357962
Beginning: 2358015	Ending: 2358018
Beginning: 2358027	Ending: 2358044
Beginning: 2358071	Ending: N/A
Beginning: 2358398	Ending: 2358400
Beginning: 2358881	Ending: N/A
Beginning: 2359136	Ending: 2359138
Beginning: 2360536	Ending: N/A
Beginning: 2360614	Ending: 2360617
Beginning: 4352549	Ending: 4352587
Beginning: 4356489	Ending: 4356502

Vehicle Type: Trailer **Body Style:** Dump trailers (14GX – Gooseneck; 14LX – bumper pull)

- f) **Descriptive information which characterizes/distinguishes the recalled vehicles from those models not included in the recall:** The subject trailers are equipped with two (2) loading ramps. On the recalled trailers, it was discovered that the utilized ramps were not manufactured by the component manufacturer, Performance Metal Works, Inc. d/b/a Pro-Form (hereinafter “Pro-Form”), to the proper specifications and are therefore underrated for the potential weight loads of the trailers equipped with the subject ramps. Photographs of the “Properly Rated Ramps” and “Underrated Ramps” appear in Attachment 1 entitled **Ramp Picture Comparisons.**

2. **Number of Vehicles Potentially Involved:**

Model Number: 14GX **Year:** 2010 **Number:** 36

Model Number: 14LX **Year:** 2010 **Number:** 242

3. **Total Number Potentially Affected by the Recall:** 278

- a) **Estimated percentage of the total number of vehicles estimated to actually contain the defect:** 100%
- b) **How was the recall population determined:** Upon investigation, the recalled models were selected because they were the only models manufactured during a particular period and within a specific VIN range with which the underrated component ramps were utilized. Upon determining the component ramps were not rated for the trailers, the subject of the recall, Big Tex ceased using the underrated ramps. Big Tex was able to determine the date the underrated 7’ ramps were first received from the component manufacturer, since the manufacturer had not been used

previously to manufacture these type ramps. As soon as it was determined that the ramps were underrated, the component manufacturer was notified and Big Tex Trailer Manufacturing, Inc. ceased using the underrated ramps. The component manufacturer has been required to manufacture future ramps in accord with Big Tex specifications as originally submitted and all underrated ramps in inventory were picked up by the component part (ramp) manufacturer.

4. **Describe defect or noncompliance (should address the nature and physical location of defect or noncompliance)**

- a) **Describe cause of defect:** Unknown to Big Tex, the ramps were not manufactured by Pro-Form (the component part ramp manufacturer) to the specifications requested by Big Tex Trailer Manufacturing, Inc.
- b) **Describe consequence of defect condition:** If the ramps are used to load or unload equipment which exceeds their weight rating, they could bend or fold, potentially causing the equipment to shift or fall during loading or unloading.
- c) **Identify any warnings, which can precede or occur:** Bending or bowing of the ramp(s).

5. **Chronological summary of the principal events that were the basis for determination of the defect – describe in detail the events starting with the first report of a problem and the events that were involved in the investigation and determination of a defect.**

The Big Tex investigation included the following:

On or about May 17, 2010, Big Tex Warranty received notice of a ramp failure. Upon investigation of the cause, Big Tex discovered that the ramps being used with its Model 14GX and Model 14LX were constructed with formed steel as opposed to structural steel. The ramps being furnished by the Component Part Manufacturer were made from “formed steel” and not “structural steel” as requested by Big Tex.

6. **Furnish description of the manufacturer's remedy of the defect – cite differences between recall condition and remedy – include description of the repair or fix – identify how repaired trailer is different from recalled trailer**

- a) **Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly (how to tell a remedied trailer from one not yet repaired)**

The underrated ramps will be removed from the trailer and properly rated ramps will be installed. The underrated ramps were manufactured by the ramp manufacturer (Pro-Form) using formed steel. The properly rated ramps use structural steel.

Photographs of the “Properly Rated Ramps” and the “Underrated Ramps” appear in Attachment 1 entitled Ramp Picture Comparisons.

Instructions for Ramp Replacement for 2010 Model 14GX and 14LX Big Tex Dump Trailers

Installation instructions:

1. First, remove the ramps currently stored in the ramp storage slots.
2. Second, replace the ramps with the new, properly rated ramps.

b) **Describe how and when recall condition was corrected in production**

The manufacturer of the ramps, Pro-Form, was notified that the ramps were not built to the specifications requested by Big Tex and no more purchases of the underrated ramps were made by Big Tex. The defective ramps in inventory were not used and were returned to Pro-Form. All Model 14GX and 14LX trailers that remained in Big Tex inventory were pulled and the underrated ramps were replaced with properly rated ramps.

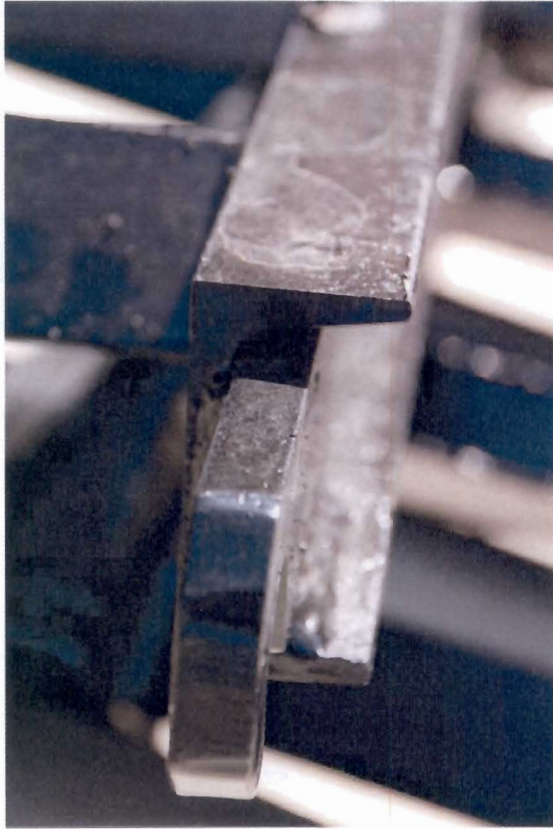
7. **Identify Recall Schedule:**

- a) **Initial notification to dealers:** Notification of dealers will occur on or before June 30, 2010.
- b) **Shipment of replacement parts to dealers:** Properly rated ramps will be shipped to dealers on or before July 15, 2010 or within three (3) business days after a dealer notifies Big Tex that an owner of a recalled trailer has brought the trailer in to obtain the replacement ramps.
- c) **Initial notification to retail purchasers and registered owners:** Notification of retail purchasers and registered owners will begin as soon as they are identified, but it is anticipated that the majority, if not all, will be identified and have notices mailed to them on or before July 15, 2010.
- d) We see no problem in implementing this recall

8. **Furnish Recall Communications** – Drafts of the notification documents are attached.

Ramp Picture Comparisons

Properly Rated Ramps



Underrated Ramps

