

Safety Defect and Noncompliance Report Guide for Equipment

PART 573 Defect and Noncompliance Report

On , Sept 9, 2010, Yakima Products, 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: Sept 9, 2010

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

- 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.**

Yakima Products, Inc.
15025 SW Koll Parkway
Beaverton, OR. 97006

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

Russ Jacobsen
Manager, Product Quality & Implementation

Yakima Products
15025 SW Koll Parkway
Beaverton, OR 97006

Telephone Number: 971-249-7503

Fax No.: 971-249-7751

Name and Title of Person who prepared this report.

Russ Jacobsen
Manager, Product Quality & Implementation

Signed:

¹ Each 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: Trailer rack system

Make: Yakima

Model: RACK and ROLL Trailer

Part Number: 8008106 and 8008107 **Size:** 66"/250 lb and 78"/300 lb (crossbar width/weight capacity)

Function: Trailer mounts to vehicle hitch and used to transport sporting equipment. It is made as a universal trailer that can be used on a variety of vehicles with a 1-7/8" ball.

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

Product was released for sale by Yakima on February 6, 2009. A total of 1,511 units have been produced.

The RACKandROLL trailer was purchased January 2009 from RACKandROLL. The design/product has included the potential issue described below from conception.

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.

Total Number Potentially Affected by the Recall: 1,511 units produced since February 6, 2009.

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

359 units were isolated at our two distribution warehouses.

1152 units were shipped to dealers. We will be notifying all dealers and will obtain an inventory count each has on hand.

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:

The design/product has included the potential issue described below from conception. All units at the manufacturer are being repaired prior to further shipments.

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 wheels (left and right) are secured onto the Wheel Blocks using an Axle Bolt, flat washer, lock washer, and hex nut. Yakima's concern is that no safety pin/trapped nut of any type is being used beyond the use of a lock washer, which could potentially lead to a wheel becoming separated from the trailer while in use.

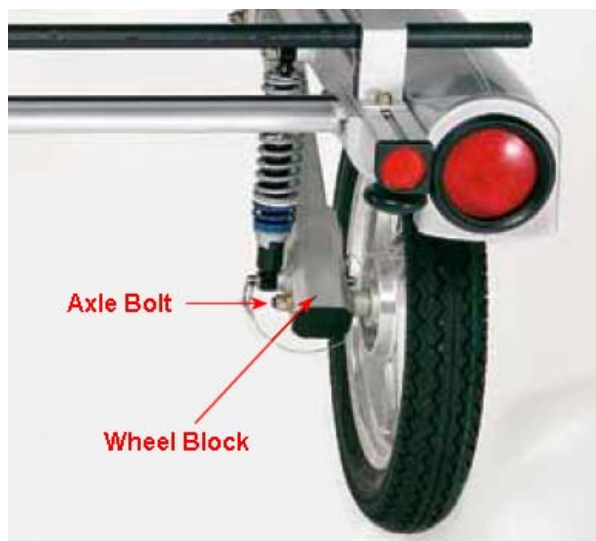
7C Grease Wheel Axle Bolt before and after insertion



7D Flat washer, lock washer, nut



7E Tighten to 57 ft. lbs. (77N-m), right Wheel Block shown



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

Design of axle bolt assembly does not provide a safety retention device, such as a cotter pin or captured nut.

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

The trailer's wheel(s) could separate from the trailer while driving, causing a hazardous situation for the user or others around.

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

The wheel could become loose and vibrate the trailer and vehicle.

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

Kemflo International, Ltd
No. 19 Aitao Road
Jiangning Development Zone
Nanjing, 211106 China

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

CS Lin - President

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.

We have received 1 notification of an incident from a consumer. Their description below (received July 29, 2010):

We recently purchased a fully assembled 78" rack and roll trailer from OKC Kayak located in Oklahoma City, Ok. We drove from Oklahoma to Dayton, Ohio today, July 29, Thursday. When we arrived at the hotel, we picked up the trailer and positioned the trailer directly behind our vehicle. When this happened, the tire on the left side fell off. After examination, we discovered that the tire was missing the nut, flat washer and lock washer. Apparently, the nut was not securely fashioned onto the tire when we bought the trailer.

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.

July 30, 2010: Consumer requested replacement hardware to re-install wheel. This prompted a review of the required hardware to service the consumer and review the issue.

August 2, 2010: Our supplier confirmed that the design never included a cotter pin or captured nut.

August 3, 2010 – September 7, 2010: Reviewed the design, warranty information to determine if the design should be changed to include a captured nut feature and necessary actions to make changes. No previous incidents were found.

September 7, 2010: Determined that the design will be updated and that Yakima should provide notification and repair kit for existing Yakima consumers.

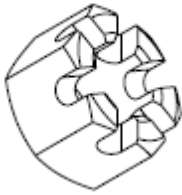
V. Identify the Remedy

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.

We will be supplying the consumers with a bolt kit that will include a new axle bolt, castle nut, and cotter pin, and clear instructions for replacing their current axle bolts. The difference between the recall condition and the remedy is that the remedy will include a cotter pin and castle nut to ensure that the wheel cannot come free from the Wheel Block.

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

New design will contain a slotted, castle nut with a cotter pin through the bolt to prevent the nut from turning.



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 production remedy is currently being implemented and is the same as the recall remedy.

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.

Sept 8, 2010

- Shipping/QA Hold at our distribution centers.

Sept 8, 2010

- Independent Sales Rep Notification
- Prepare consumer notifications for review

Sept 13, 2010

- Submit NHTSA Defect and Noncompliance Report for Equipment

Sept 17, 2010

- Sent out Dealer letters
- Implement consumer Repair Kit #8880180

Sept x, 2010

- Receive NHTSA Campaign number
- Send out Owner Letters

Sept 20 - 30, 2010

- Collect consumer sell-through and contact information -ongoing
- Publish web page on yakima.com and our dealer website to inform consumers and dealers of the issue

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.