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By Recall Management Division at 11:07 am, Nov 01, 2010

Miller Electric Mfg. Co.

An Illinois Tool Works Company



1635 West Spencer Street  
P.O. Box 1079  
Appleton, WI 54912-1079 USA  
920-734-9821  
[www.MillerWelds.com](http://www.MillerWelds.com)

October 29, 2010

Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attention: Recall Management Division (NVS-215)  
1200 New Jersey Avenue, SE.  
Washington, DC 20590

**10V-541  
(3 Pages)**

Dear Sir;

On 10/25/10 our service department informed us that we may have a potential safety defect on small trailers we have fabricated over the past year. This report is intended to comply with Section 573.6(b) Defect and Noncompliance Information Report. Investigations are on-going in our engineering department to further define the defect and the extent of the problem. However it is clear to us that this situation could be a serious safety issue and we are notifying you in accordance with Part 573.

1. Manufacturer's name: General Rich Enterprises LLC  
17795 Foothill Blv.  
Fontana, CA 92335  
949-290-1688

Distributor's name: Miller Electric Manufacturing Co.  
1635 West Spencer St  
P.O. Box 1079  
Appleton, WI 54912-1079  
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2. Item of the motor vehicle equipment potentially containing the defect

Miller Electric fabricates a small trailer (2960 lbs GVWR) according to the FMCSS guidelines upon which welders can subsequently attached to create a portable welder.

Frames and axles (including the potentially defective hubs and bearings) are imported from a Chinese manufacturer and assembled with DOT certified wheels, tires, and lights to meet the requirements of FMCSS. Miller Electric Manufacturing Co. certifies the trailer as: "This vehicle conforms to all applicable Federal motor vehicle safety standards in effect on the date of manufacture shown above."

On 9/22/10, Miller Electric was notified by one of our customers (an initial buyer of the trailer) that a wheel assembly had fallen off of their trailer. Miller Electric immediately requested that the trailer be sent back to our engineering department in Appleton, WI to determine root cause. The entire trailer was sent back except the missing rim, tire and hub assembly.

The component of concern was manufactured in China by:  
Component: Hub assembly

Manufacturer: ZHEN JIANG SAN XIN METAL INDUSTRY CO. LTD.  
Address: Ahenrong Road Miaojiadian Country Dantu Block Zhenijian  
Postcode: 212028

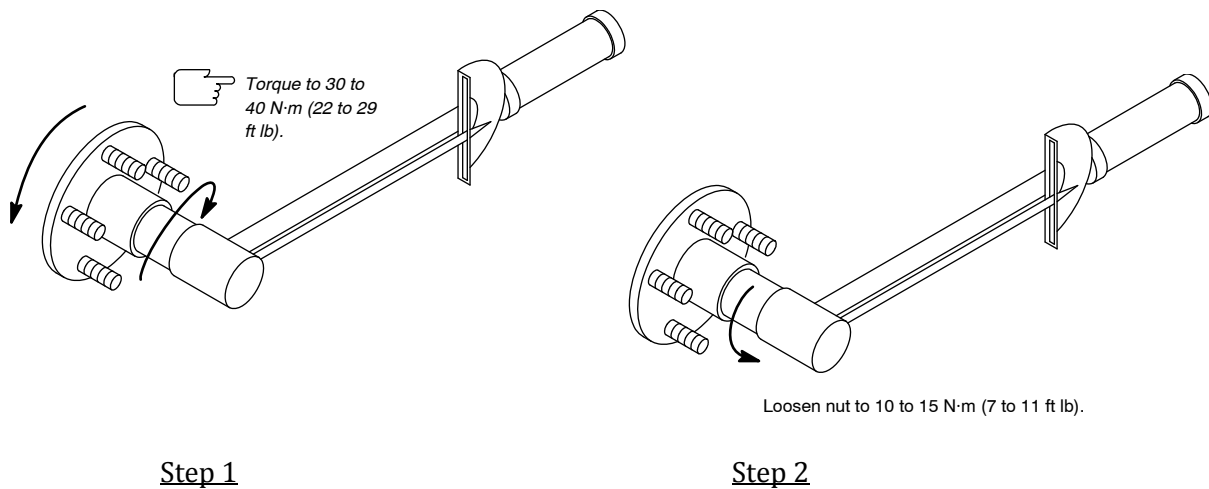
Phone number: (0511)84512088

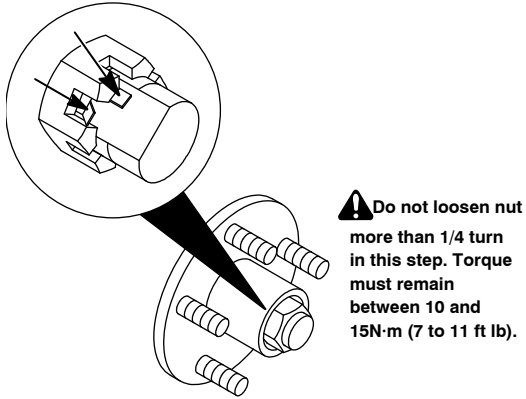
They have been contacted and notified of the necessary corrections to resolve this defect in future hub assemblies.

3. There have been 490 of these trailers sold since we started manufacturing them in February 2010. We do have records of all of the initial purchasers.
4. Based on our limited sampling of hub assemblies in stock we estimate that up to 5% of these trailers may have flawed bearing torques. Our engineering staff continues to analyze the source and the extent of the potential problem.
5. Three potential root causes for the failure of the bearing of the trailer that lost the wheel assembly:
  - a. Over-torque of axle nut
  - b. Lack-of or improper lubrication
  - c. Defective bearing(s)

Based on our testing, we have identified that the bearings were excessively torqued in 3% of the hub assemblies tested and identified that this could have been the source of the failed hub assembly.

The 3 steps below demonstrate typical procedure for correctly torquing the axle nut. We have identified over-torque as one of the main causes for bearing and hub assembly failure.





Check to see if slot in nut aligns with one of the tabs on the washer. Bend tab of washer into a slot of the nut.

### Step 3

One potential solution is to inspect or replace the hub assembly and properly re-install the hub assembly per the above procedure.

Note: Also noticed in the initial sample was a nut that had been incorrectly fastened and locked but determined that this would not have been the source of the damages that occurred. However it does raise sufficient quality concerns with the manufacturer to revisit the specifications Miller Electric initially required.

6. This is the first and only defect reported concerning the hub assembly defects on these trailers. Although a pattern or even multiple failures have not occurred, it is our position that the safety risks warrant immediate resolution.
7. The Chinese supplier has been notified of the defect and has been given specific instructions on the appropriate bearing torque on future axles. Quality inspections of all future new trailers will include verification of proper hub assembly installation.

All purchasers of these trailers will be notified of the potential defect within two weeks and will be provided the necessary parts and instructions for the correction if necessary. All costs incurred by these trailer owners will be covered by Miller Electric for up to one year after the notification letter.

Miller Electric is committed to resolving this potential safety defect as soon as possible. We appreciate whatever advice and direction NHTSA may have to offer. We are aware of the quarterly reporting requirements to keep you informed and will comply.

Sincerely,

David Radtke  
Engineering Manager  
Miller Electric Mfg. Co