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By Recall Management Division at 9:41 am, Jun 15, 2011

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950 I-30 East  
Mt. Pleasant, TX 75455  
Phone (903) 575-0300  
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June 14, 2011

**VIA FED EX**

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/Madam:

On or about June 8, 2011, 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 (Brennan Industries, Inc., Part No. 6405-06-06-0; hydraulic adapter fitting) was used with trailers listed below and in the attached "Initial NHTSA Notification, Notice of Proposed Recall of Models 10LP, 10LX, 12LP, 12LX, 14GX, 14LX, 14OD, 50DS and 70LP Dump Trailers, Safety Related Defect", and Big Tex 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 10LP, 10LX, 12LP, 12LX, 14GX, 14LX, 14OD, 50DS and 70LP Dump Trailers.

Date of Report: June 14, 2011

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

Stan Garrett  
Big Tex Trailer Manufacturing, Inc.  
950 I-30 East  
Mt. Pleasant, Texas 75455  
(903) 575-0300, Ext. 2194  
(903) 577-8858 – facsimile  
Email: [stan.garrett@bigtextrailers.com](mailto:stan.garrett@bigtextrailers.com)

2. The corporate name and contact for the fabricating manufacturer of the subject defective component part (Brennan Industries, Inc. Part No. 6405-06-06-0; hydraulic adapter fitting) is:

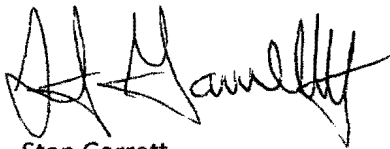
Brennan Industries, Inc.  
Owen Seaman  
Vice President  
1189 108th Street  
Grand Prairie, TX 75050-2504  
(972) 988-8311 – Phone  
(972)660-6638 - Fax  
[oseaman@brennaninc.com](mailto:oseaman@brennaninc.com)

3. The corporate name and contact for the vendor of the subject defective component part (Brennan Industries, Inc. Part No. 6405-06-06-0; hydraulic adapter fitting) is:

SunSource Holdings, Inc.  
Barry Pullin  
Vice President  
1833 Johanna  
Houston, TX 77055  
(713) 548-5500 – Phone  
(713) 681-1216 – Fax  
[bpullin@sunsrce.com](mailto:bpullin@sunsrce.com)

Further information, as required, is included in the attachments to this notification, entitled "Initial NHTSA Notification, Notice of Proposed Recall of Models 10LP, 10LX, 12LP, 12LX, 14GX, 14LX, 14OD, 50DS and 70LP Dump Trailers, Safety Related Defect". Drafts of the notification documents are also attached.

Sincerely,



Stan Garrett  
Vice President – Finance & Accounting

**Initial NHTSA Notification,  
 Notice of Proposed Recall of Models 10LP, 10LX, 12LP, 12LX, 14GX, 14LX, 14OD,  
 50DS and 70LP  
 Dump Trailers  
 Safety Related Defect**

1. Vehicle Models Involved in Recall:

- a) Make(s): Big Tex Trailer Manufacturing, Inc.
- b) Model Years Involved: 2011
- c) Model(s): 10LP, 10LX, 12LP, 12LX, 14GX, 14LX, 14OD, 50DS and 70LP
- d) Productions Dates: Beginning: February 24, 2011  
Ending: June 6, 2011
- e) VIN Range: Please see attached Exhibit "A"
- f) Vehicle Type: Trailer Body Style: Dump trailers
- g) Descriptive information which characterizes/distinguishes the recalled vehicles from those models not included in the recall:

The subject trailers are equipped with Brennan Industries hydraulic hose adapter fitting, Part No. 6405-06-06-0, which is silver in color. A photograph comparing the defective adapter fitting with the replacement adapter fitting is attached as Exhibit "B" – "Adapter Fitting Comparison".

2. Number of Vehicles Potentially Involved:

Model 10LP	Year: 2011	Number:	18
Model 10LX	Year: 2011	Number:	2
Model 12LP	Year: 2011	Number:	7
Model 12LX	Year: 2011	Number:	112
Model 14GX	Year: 2011	Number:	64
Model 14LX	Year: 2011	Number:	567
Model 14OD	Year: 2011	Number:	21
Model 50DS	Year: 2011	Number:	5
Model 70LP	Year: 2011	Number:	4

3. Total Number Potentially Affected by the Recall: 800

- 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 within which the defective adapter fittings were utilized. Upon determining the adapter fittings were possibly ailing, Big Tex notified the component vendor (SunSource Holdings, Inc.) and component manufacturer (Brennan Industries, Inc.). Big Tex was advised by SunSource that the date the defective adapter fittings were first received by Big Tex from the vendor was February 24, 2011. Therefore, the recall population begin date is based on this information. Big Tex immediately ceased using the defective adapter fittings. On June 6, 2011 Big Tex received the replacement adapter fittings and therefore, has used June 6, 2011 as the end date of the affected population.

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

- a) **Describe cause of defect:** Big Tex is unable to independently determine the cause of the defect in the adapter fitting.
- b) **Describe consequence of defect condition:** The failure of the adapter fitting has caused a piece of the fitting to shear off and has also resulted in hydraulic fluid leaks, which could result in the bed gravity free falling.
- c) **Identify any warnings, which can precede or occur:** A leaking fitting is the first warning that there is a potential problem with the adapter fitting.

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.

On or about May 19, 2011, two (2) adapter fittings sheared during installation of the hydraulic hoses on a trailer being manufactured by Big Tex. Big Tex immediately notified SunSource, its vendor and SunSource sent a representative to Big Tex's Mt. Pleasant, Texas plant to inspect and review Big Tex's concerns. Subsequently, SunSource provided Big Tex with a list of suspect fittings from their supplier, Brennan Industries, Inc. Brennan Industries also inspected the suspect adapter fittings. As a result of the investigation, Big Tex ceased using the suspect adapter fittings, and received replacement adapter fittings on or about June 6, 2011. Big Tex determined that a safety defect existed in their manufactured product, as a result of the defective

adapter fittings supplied by SunSource and manufactured by Brennan Industries.

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:

The defective adapter fitting is silver in color and may or may not have "BEI" stamped in one of the hex sides. The replacement adapter fitting is brass in color and all are stamped with "Eaton" on one of the hex sides.

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

Corrective action was taken immediately. All defective adapter fittings in stock were pulled and quarantined. Upon receipt of the "Eaton" adapter fittings, all units still in production, or in possession of Big Tex, had the defective adapter fittings removed and replaced.

7. Identify Recall Schedule:

a) Initial notification to dealers: On or before July 15, 2011.

b) Shipment of replacement parts to dealers: On or before July 31, 2011.

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 31, 2011.

d) We see no problem in implementing this recall.

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