

*\* Amended \**

Safety Defect and Noncompliance Report Guide for Vehicles  
PART 573 Defect and Noncompliance Responsibility and Reports<sup>1</sup>

On September 14, 2011, The Aluminum Trailer Company[MFR] decided that (a defect which relates to motor vehicle safety) (a noncompliance with Federal Motor Vehicle Safety Standard No.       ) exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: 9-20 - 2011

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

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

*The Aluminum Trailer Company  
401 South Williams St. P.O. Box 396  
Nappanee, IN 46550*

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

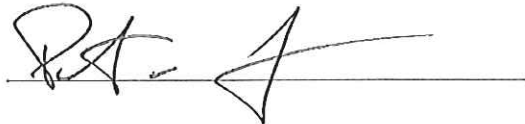
*Peter Gingerich, CFO*

Telephone Number: *(877) 441-2440* Fax No.: *(574) 773-7769*

Name and Title of Person who prepared this report.

*Pete Gingerich, CFO*  
*Tom Vanderputten, Warranty Mgr*

Signed:



<sup>1</sup> 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 Responsibility and 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 by E-Mail to [RMD.ODI@dot.gov](mailto:RMD.ODI@dot.gov).

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): ATC Model Years Involved: 2007-2012 Model(s): Boss Hoss; Cargo; Contender; Fast Lane; GTS; QST; SS

Production Dates: Beginning: December 2006 Ending: September 2011

VIN Range: Beginning: 168730 Ending: 170301 *Plus 12-20-11*

Vehicle Type: Trailer Bodystyle: Enclosed

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

12" extended tongue option selected ; fits other criteria and variables outlined in section 4

Make(s): \_\_\_\_\_ Model Years Involved: \_\_\_\_\_ Model(s): \_\_\_\_\_

Production Dates: Beginning: \_\_\_\_\_ Ending: \_\_\_\_\_

VIN Range: Beginning: \_\_\_\_\_ Ending: \_\_\_\_\_

Vehicle Type: \_\_\_\_\_ Bodystyle: \_\_\_\_\_

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): \_\_\_\_\_ Model Years Involved: \_\_\_\_\_ Model(s): \_\_\_\_\_

Production Dates: Beginning: \_\_\_\_\_ Ending: \_\_\_\_\_

VIN Range: Beginning: \_\_\_\_\_ Ending: \_\_\_\_\_

Vehicle Type: \_\_\_\_\_ Bodystyle: \_\_\_\_\_

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

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

- Represents approximately 3.5% of total vehicles produced over the same period

**II. Identify the Recall Population**

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

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
Boss Hoss	2008	2
Cargo	2009	1
<del>Contender</del>	<del>2007</del>	<del>5</del>
Contender	2008	4 2
Fast Lane	2007	8 1
Fast Lane	2008	1
<del>Fast Lane</del>	<del>2009</del>	<del>1</del>
GTS	2008	1
<del>QST</del>	<del>2007</del>	<del>18</del>
QST	2008	37 13
QST	2009	14
QST	2010	48 17
QST	2011	22 20
QST	2012	7 6
SS	2010	3
SS	2011	2
SS	2012	1

Total Number Potentially Affected by the Recall:

145 84

*Plus  
12-22-11*

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 75 %

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 vehicles:

The models selected were all models containing the specific characteristics identified by Aluminum Trailer Company engineering department to be the determining factors that could cause hitch failure.

These characteristics are 1) 12" extended hitch option 2) Overall trailer length under 28' 3) GVAR greater than 7,000 lbs. but less than 14,000 lbs.

The start date of the trailers affected was based on the start date of an engineering change to reduce material used in the manufacture of the trailer frame.

The final date selected was based on the engineering change to correct the assumed cause of the hitch defect.

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### 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.

Some of the Aluminum Trailer Company's trailers, models with 12" extended hitch frames are breaking near the front cross member on the frame of the trailer.

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

The cause of the defect as determined by the Aluminum Trailer Company engineering department is insufficient material used in the frame hitch.

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

The hitch could potentially break causing separation from the towing vehicle, thereby posing a risk of personal injury and property damage.

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

Warning signs include excess deflection of the hitch and weld cracking initiating in the area of the hitch and the trailer frame front cross member.

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

N/A

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

N/A

#### 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.

The following incidents preceded our investigation and were the basis for our determination:

Incident # 1: Reported to Service and Warranty on 6/6/2011 of a hitch failure involving  
VIN 169152  
ATCCON8528ta4  
6,000 lbs. Axles  
12" Extended Hitch

Incident # 2: Reported to Service and Warranty on 6/14/2011 of a hitch failure involving  
VIN 169252  
ATCQST8528ta3  
5,200 lbs. Axles  
12" Extended Hitch

Incident # 3: Reported to Service and Warranty on 8/15/2011 of a hitch deflection involving  
VIN 169501  
ATCQST8524ta3  
5,200 lbs. Axles  
12" Extended Hitch

There were no accidents, no injuries, and no fatalities involved with the above mentioned incidents. The only damage incurred was to the trailers. In all of the above incidents repairs were initiated and the trailers fixed under the direction of the Aluminum Trailer Company engineering department.

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.

As a result of the last incident, the Aluminum Trailer Company engineering department concluded that the issue could be related to a function of time and use on the trailers as opposed to limited and isolated incidents.

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#### V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealer, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan if previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

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Any retail customer that has already remedied this defect prior to this recall will be reimbursed for the material and labor needed to repair the hitch defect.  
Since the estimate of the Aluminum Trailer Company to repair this defect is \$ 400.00 the reimbursement will not exceed that amount.

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9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

See attached print (exhibit 1)

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

\_\_\_ 2.0 in x .375 in aluminum plate welded to frame as shown

Structural reinforcement welded to bottom of hitch member.

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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.

\_\_\_ Production change on all aluminum trailers with the extended hitch and GVWR greater than or equal to 10,000 lbs. to 2 x 8 aluminum hitch members

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#### VI. Identify the Recall Schedule

10. 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.

\_\_\_ 1) There are no other manufacturers affected by this recall.

2) Dealers and retail purchasers identified by Aluminum Trailer Company records will be notified by 1<sup>st</sup> Class Mail immediately after approval of the recall letter by the NHTSA.

Foreseeable problems with the implementing of this recall are the number of Warranty Registrations and the source for the retail customer notification information is only 60 % of our total trailers sold.

In addition, the remedy for the defect is to weld additional material to the hitch. Finding a welding facility near some of the retail customers may be problematic.

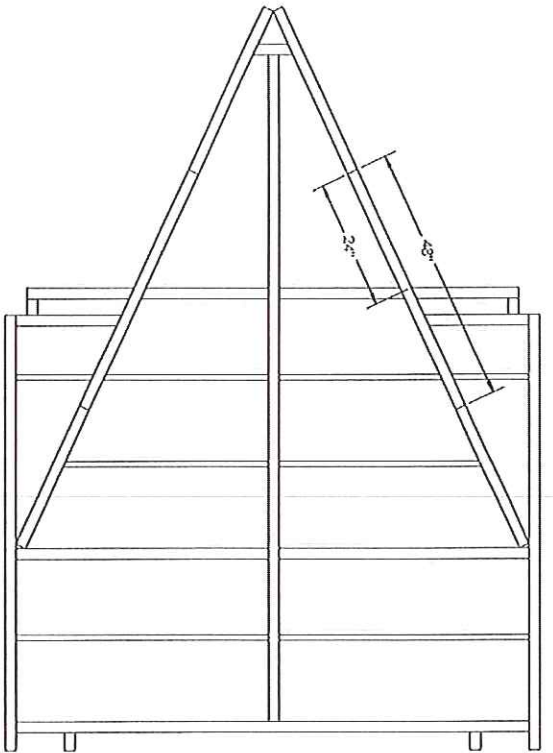
## VII. Furnish Recall Communications

11. 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 to RMD,ODI@dot.gov for review prior to mailing.*

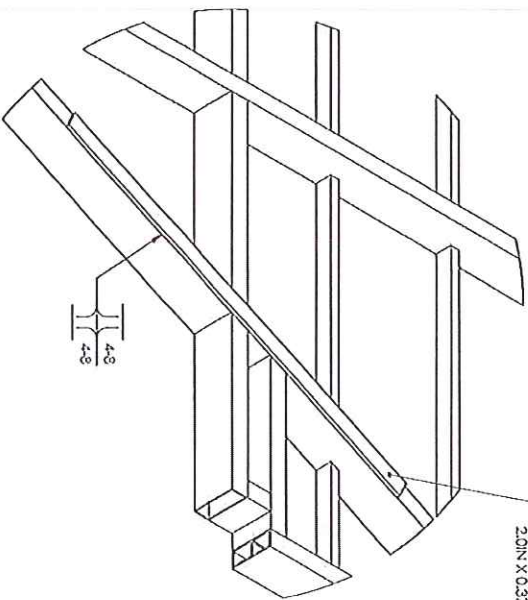
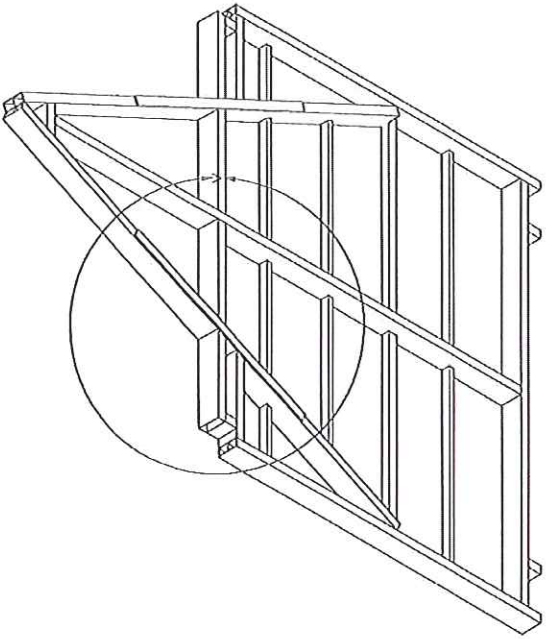
Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

-See Exhibit 2

Exhibit 1



BOTTOM VIEW



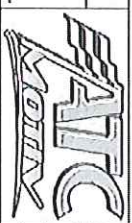
DETAIL A  
SCALE 1:8

6061-T6 ALUMINUM  
2.0IN X 0.575IN PLATE

REV.	DESCRIPTION	DATE	APPROVED
REVISION TABLE			

ALL LOCATIONS ARE NOMINAL UNLESS CRITICAL DIMENSIONS ARE SPECIFICALLY NOTED

PROPRIETARY AND CONFIDENTIAL: THE INFORMATION CONTAINED IN THIS DRAWING IS THE SOLE PROPERTY OF THE ALUMINUM TRAILER COMPANY. ANY REPRODUCTION IN PART OR AS A WHOLE WITHOUT THE WRITTEN PERMISSION OF THE ALUMINUM TRAILER COMPANY IS PROHIBITED.



DRAWN BY:		DATE:		VIN #		REV.	
MRC		09/20/11		N/A		.	
FILE NAME: FEA_EXTENDED_TONGUE_3.DWG, TRAILER_200025, RAILC_3007_4.DWG				DATE PRINTED: 9/20/2011		SHEET 1 OF 1	

TITLE: TONGUE STRUCTURAL REPAIR

Exhibit 2

The Aluminum Trailer Company  
401 South Williams St. P.O. Box 396  
Nappanee, IN 46550, (877) 441-2440

Date

Address  
City, State Zip

RE: IMPORTANT CONSUMER SAFETY NOTICE

Dear \_\_\_\_\_:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

#### REASON FOR THIS RECALL

The Aluminum Trailer Company ("ATC") has decided that a defect which relates to motor vehicle safety exists in certain ATC model car hauler trailers with extended hitches manufactured by ATC from *December 1, 2006 until September 16, 2011*

ATC has determined the aluminum in the hitch on the trailer may weaken and possibly break, which could cause the trailer to become detached from your towing vehicle, becoming a safety risk and potentially causing property damage and personal injury. Safety of all past and present ATC trailers is our top priority.

You can inspect your trailer for possible deflection of the hitch and initial cracking of welds at the hitch and front cross member on the frame.

If you believe your trailer does not contain this defect or there are no visible signs of potential failure, please contact the Aluminum Trailer Company with this information.

Please be certain that the payload in your trailer does not exceed the recommended total as this will exacerbate the problem. This information can be found on the Vehicle Identification Sticker located on the hitch of your trailer.

Our records indicate that you purchased a model --- trailer; VIN -----; from *name of Dealer in month of year*. If you are still the current owner of the trailer, we need your help to make arrangements to inspect this trailer.

#### WHAT WE WILL DO

ATC will cause such defect or noncompliance to be remedied without charge, to you by repair of the aluminum trailer hitch. The earliest date on which the defect or noncompliance can be remedied without charge is 12/1/2011[This is the earliest date on which the we reasonably expect that service facilities will receive necessary parts and instructions]. To repair the trailer an additional aluminum plate will be welded to the underside hitch of the trailer.

#### WHAT YOU SHOULD DO

Please contact Tom Vanderputten at The Aluminum Trailer Company by mail, at P.O. Box 396 Nappanee, IN 46550, phone (877 441 2440) or electronic mail [tomv@aluminumtrailer.com](mailto:tomv@aluminumtrailer.com). We will then make arrangements to refer you to a local weld shop to make the required repairs. If any safety improvements are needed, we will make the necessary changes at no cost to you. We estimate the time reasonably necessary to perform the labor required to correct the defect or noncompliance is approximately 3 hrs. Please ask the shop directly if you wish to know how much additional time will be needed to schedule and process your trailer.

After contacting the weld shop if you take your trailer to the weld shop on the agreed service date and they do not remedy this condition on that date or within (3) days, we recommend you contact ATC customer service by calling 574 - 773 - 8360.

After contacting the ATC customer service number, if you still are not able to have the safety defect remedied without charge and within a reasonable time, you may submit a complaint to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE., Washington, DC 20590; or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>, if you

believes that ATC has failed or is unable to remedy the defect or noncompliance without charge.

We will furnish you a warranty number to use with all communications. If you have sold or traded your trailer, please let us know by completing the postage paid reply card and returning it to us.

We take great pride in the quality and safety of our products. Your participation in this process helps us achieve our goal of continuing to provide our customers with many more years of safe travel trailer use. We are sorry for this inconvenience; however we have taken this action in the interest of your safety and continued satisfaction with our products.

If you have any questions, please contact me. Thank you for your cooperation.

Sincerely,

Tom Vanderputten  
Service and Warranty Manager