

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

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.

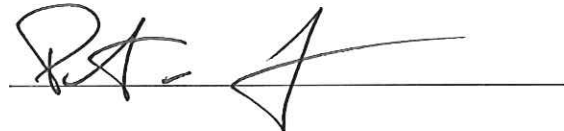
Peter Gingerich, CFO

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:



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.

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: 168309 Ending: 170306

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
Contender	2007	5
Contender	2008	4
Fast Lane	2007	8
Fast Lane	2008	1
Fast Lane	2009	1
GTS	2008	1
QST	2007	18
QST	2008	37
QST	2009	14
QST	2010	18
QST	2011	22
QST	2012	7
SS	2010	3
SS	2011	2
SS	2012	1

Total Number Potentially Affected by the Recall: 145

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.

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.

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 it 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.

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.

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)

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.

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 GVAR greater than or equal to 10,000 lbs. to 2 x 8 aluminum hitch members

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 1st 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.

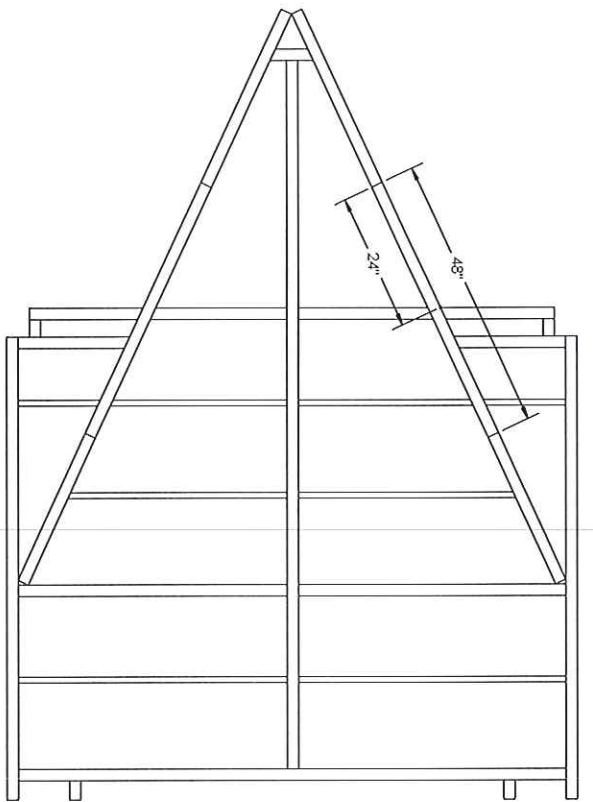
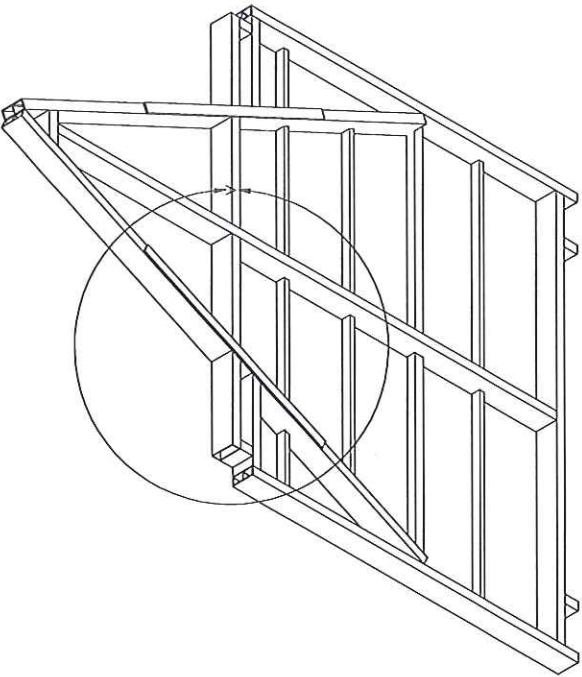
VII. Furnish Recall Communications

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.*

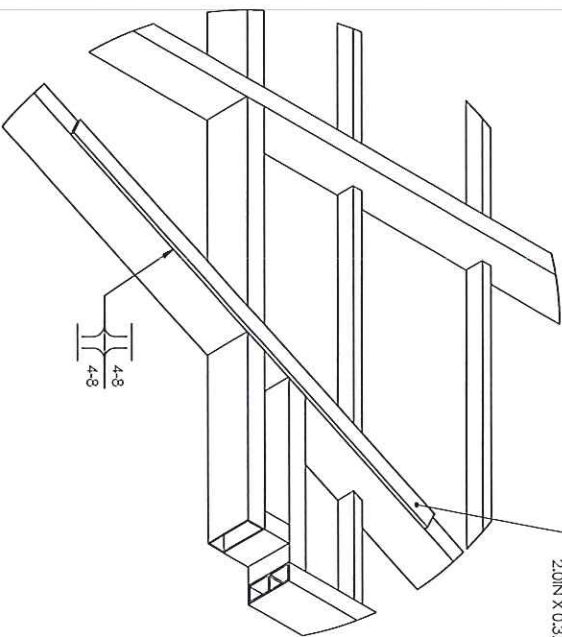
Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

-See Exhibit 2

Exhibit 1



BOTTOM VIEW



DETAIL A
SCALE: 1:8

6061-T6 ALUMINUM
2.0IN X 0.375IN 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.



TITLE: TONGUE STRUCTURAL REPAIR			
DRAWN BY: MRC	DATE: 09/20/11	VIN #	REV.
FILE NAME: Y:\A_EXTENDED TONGUE - 2006A.TBPR.C 2006A'S PLATE SHORT A40	DATE PRINTED: 9/20/2011	N/A	
SCALE: 1:6			SHEET 1 OF 1