



*The First Name In Trailers*

January 19, 2012

Via FedEx

NHTSA - Associate Administrator for Enforcement  
Office of Defects Investigation, Defects Div. NVS-211  
1200 New Jersey Ave. S.E.  
Washington, DC. 20590

Dear Recipient:

As required by Federal Regulation 49 CFR Part 573; we are submitting the enclosed following communiqués.

- **Part 573 Defect and Noncompliance Report**
- **Defect Information Notice – Liftgate Battery Box Mounting Inspection and Repair Procedures, Ref. No. 357309**

Respectfully submitted,

Blas Gonzalez, Regional Manager  
Field Service Department  
Utility Trailer Manufacturing Company

**PART 573 Defect and Noncompliance Report<sup>3</sup>**

On **January 16, 2012**, Utility Trailer Manufacturing Co. determined that a condition that may relate to motor vehicle safety may exist 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 Reports.

Date this report was prepared: **January 16, 2012**

Furnish the manufacturer's identification code for this recall (if applicable): NA, manufacturer of the recalled component.

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.

**UTILITY TRAILER MANUFACTURING COMPANY**  
**17295 E. RAILROAD STREET**  
**CITY OF INDUSTRY, CALIFORNIA 91748**

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


**Sal Molina, Manager**  
**Field Service Department**  
**Utility Trailer Manufacturing Company**

Telephone Number: **626-854-7215**

Fax Number: **626-965-5660**

Name and Title of Person who prepared this report.

**Blas Gonzalez**  
**Regional Field Service Manager**  
**Field Service Department**

Signed:   
Blas Gonzalez

<sup>3</sup> Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, 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. Jon White at (202) 366-5227 or by FAX at (202) 366-7882.

**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): UTILITY Model Years Involved: 2011 and 2012 Model(s): as follows: Dry Vans

(Single axle, dual axle and tri-axle, commercial, semi refrigerated vans and dry freight vans)

Production Dates: Beginning: December 2010 Ending: August 2011

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

Descriptive information which characterizes/distinguishes the recall vehicles from those model vehicles not included in the recall: Dry Vans Manufactured with option: Install Liftgate Battery Box (Single / Double)

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 involved Widgets equipped with certain items of equipment from January 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period. .0033 %

**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>
<u>VS1DC</u>	<u>2011</u>	<u>10</u>
<u>VS1DC</u>	<u>2012</u>	<u>2</u>
<u>VS2DX</u>	<u>2011</u>	<u>22</u>
<u>VS2DX</u>	<u>2012</u>	<u>61</u>

Total Number Potentially Affected by the Recall: 95

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

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:

Utility determined that the cause of the defect was installing the liftgate single / double battery box using an incorrectly sized mounting plate and, in some instances, an improperly oriented mounting plate. The incorrectly sized mounting plates were fabricated in December 2010 and were still in inventory in December 2011 when Utility learned of their existence. The incorrectly sized mounting plates were fabricated in Utility's Arkansas plant and were used exclusively in that plant; additionally, those mounting plates were used only on trailers containing liftgates made by certain manufacturers.

With this information, Utility performed a record search of all trailers manufactured in its Arkansas plant between December 2010 and December 2011 that contained the option of either a single or double battery box for liftgates manufactured by those manufacturers for which Utility had used this style of mounting plate. Utility determined that it had installed these single or double battery boxes on trailers manufactured in Arkansas between December 2010 and August 2011; it had not manufactured any trailer after August 2011 that contained a liftgate (and thus a single or double battery box) from one of the identified liftgate manufacturers. Those trailers – manufactured between December 2010 and August 2011 – are the subject of this notice.

### III. Describe the Defect or Non Compliance

5. Describe the defect or noncompliance. The defect should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

Utility has determined that it used incorrectly sized mounting plates to mount single or double battery boxes on trailers that included liftgates manufactured by certain liftgate manufacturers. Also, Utility determined that some of these mounting plates were misoriented when installed. Utility is authorizing an inspection and repair if applicable.

Also, see the attached notices: Defect Information Notice – Liftgate Battery Box Mounting Inspection and Repair Procedures (3 pages)

- Describe the cause(s) of the defect:

During December 2010, Utility fabricated incorrectly sized mounting plates for use in mounting battery boxes on trailers that included certain models of liftgates. Also, Utility has learned that some of the plates were misoriented when installed.

- Describe the consequence(s) of the defect or noncompliance condition:

**Battery boxes mounted with the incorrectly sized or improperly oriented mounting plates can become detached from the trailer.**

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

**Refer to the attached copy of the Liftgate Battery Box Mounting Inspection and Repair Procedures**

- 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 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.

**In November 2011, Utility received a customer notification that liftgate battery box had fallen off the trailer. During the same month, Utility learned of three additional incidents of battery boxes becoming detached from trailers, all of which had been manufactured in Arkansas.**

**When it learned of the first box becoming detached, Utility launched an investigation to determine the cause of the failure and to ascertain the extent of any damage. Utility's investigation showed that the only damage occurring from the reported incident was to the battery box; no accidents, injuries, or fatalities occurred or WERE reported.**

**The box that had become detached was retrieved, and Utility inspected both the box and the trailer. Utility's inspection and investigation excluded external variables – such as objects coming in contact with the battery box – as a cause of the failure. Utility also evaluated the weld used to secure the mounting plates; that investigation showed that the weld had adequately penetrated the metal.**

**In December 2011, as part of its ongoing investigation, Utility conducted an additional inspection of a customer's trailer and discovered that the mounting plates for a double battery box were incorrectly sized, and one of the plates had been improperly oriented. Working with the factory, Utility determined that that the mounting plates were fabricated undersized (2"x 5" versus the correct size of 5"x8"), and that some of the brackets had been misoriented by 90° when installed.**

**On January 5th, Utility initiated a recall inspection; approximately a week later, Utility upgraded the recall to a safety campaign.**

**As part of its recall, Utility sent a Service Directive to two dealers and to two end users for the purpose of expediting the inspection and the repair, if applicable, on those specific trailers. Utility believes that the affected trailers were sold only to these dealers / end users.**

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.

**See # 6.**

#### **V. Identify the Remedy**

8. Furnish a description of the manufacturer's remedy for the defect of non-compliance. Clearly describe the difference between the recall condition and the remedy.
  - a. **Inspect the mounting plates used to mount the single or double battery boxes on the potentially affected trailers; replace them if they are incorrectly sized or improperly oriented.**
  - b. **Refer to the attached copy of the Liftgate Battery Box Mounting Inspection and Repair Procedures**

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

**There are two mounting plates for the single box and four for the double box. The incorrect mounting plate is 2"x5". The correct size mounting plate is 3"x 8". The longer edge of the plate should be mounted with a horizontal orientation; the shorter edge should be mounted with a vertical orientation. See the attached copy of the Liftgate Battery Box Mounting Inspection and Repair Procedures.**

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.

**No trailers manufactured in Arkansas after August 2011 used the incorrectly sized plates. Utility has discarded all incorrectly sized plates to prevent a repeat condition.**

#### **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.

**Utility does not intend to send another notification to dealers or end users as this has already been completed. Utility continues to monitor the completion of this work, and to date, has received confirmation of the completion of 36% of the affected trailers. Utility intends to continue monitoring until all identified trailers have been inspected / repaired.**

#### **VII. Furnish Recall Communications**

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect of 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 document should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.