

**RECEIVED**

12:50 From: PARKER TRAILER SALES 9035720269

To: 2023668546

12V-210  
(7 Pages)

By Recall Management Division at 2:14 pm, May 11, 2012

# PERFORMANCE TRAILERS

P.O. Box 463 • Mt. Pleasant, Tx 75456  
Phone: (903) 572-0029 • Fax: (903) 572-0269

April 2, 2012

Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Ave. S.W.  
Washington, DC 20590

Dear Sir or Madam:

As a result of Dexter Axle Company report on their electric/hydraulic brake actuator hydraulic pump, Parker Trailer Sales, Inc. will conduct a notification and remedy campaign under the Vehicle Safety Act. Accordingly, we are submitting the enclosed Information Report containing the information required by Part 573 of your regulations, as well as a draft customer notification letter. Parker Trailer Sales, Inc. is prepared to start the campaign promptly after receiving your approval of the draft customer notification letter.

If you have questions or need additional information, please feel free to contact me directly at 903-572-0029.

Sincerely,  
Parker Trailer Sales, Inc.



Kerry Whitaker  
Product Safety Manager

**naim**

Building Safer Trailers for Tomorrow

P.O. Box 463 • Mt. Pleasant, Tx 75456  
 Phone: (903) 572-0029 • Fax: (903) 572-0269

# PERFORMANCE TRAILERS

## INFORMATION REPORT (NHTSA RECALL NOTICE 11E-057)

### 1. Manufacturer's Name/Address:

Parker Trailer Sales, Inc.  
 P.O. Box 463  
 Mt Pleasant, TX 75456

### 2. Trailers Involved in the notification: The following models of Parker trailers are subject to this recall:

Model	Production Range Date
GNTD9630	9/1/11 – 12/19/11
GNTD9632	9/1/11 – 12/19/11
GNTD9633	9/1/11 – 12/19/11
GNTD10240	9/1/11 – 12/19/11
HP7720	9/1/11 - 12/19/11
GNTD9635	9/1/11 – 12/19/11

This production date range cover 100% of the Parker Trailers manufactured in the time frame listed above. Affected models can be identified by verification of the model, serial number and model year found on the vin plate as follows:

Serial Number	Model	Model Year
13ZGF3023C1	GNTD9630	2012
13ZGF3228C1	GNTD9632	2012
13ZGF3321C1	GNTD9633	2012
13ZGF4026C1	GNTD10240	2012
13ZHP2025C1	HP7720	2012
13ZGF302XC1	GNTD9630	2012
13ZGF3526C1	GNTD9635	2012

### 3. Total number of vehicles: Seven trailers have been identified.

4. Approximate percentage of vehicles estimated to actually contain the condition: Parker Trailer Sales, Inc. has found that only 7 of the defective units have been delivered by McKelvey Enterprises in the time frame indicated. Therefore, the upcoming Parker Trailer Sales, Inc. recall notification will include 100% of the trailers identified in Items 2 and 3, above.

5. Description of the issue: Dexter Axle Company was notified by the supplier of the hydraulic pump used in their electric/hydraulic brake actuator that some of these pumps had not been properly heat treated. This condition can cause premature wear of some critical components in these pumps which can render the unit inoperable. The electric/hydraulic brake actuator provides braking power to the trailer brakes. Failure of this actuator can result in the loss of braking effort by the trailer.

6. Chronological summary of events leading to this determination: Parker Trailer Sales, Inc. first became aware of this issue on March 30, 2012 when it received a certified letter from NHTSA in response to Dexter notifying NHTSA of the defect.

On April 2, 2012 Parker Trailer Sales, Inc. initiated the NHTSA notification process.

As of the date of this letter, Parker Trailer Sales has not received any warranty claims related to this defect.

7. Description of proposed remedy: Parker Trailer Sales, Inc. will conduct a recall by sending a Safety Recall Notice that satisfies the requirements of 49 CFR part 577.5 to all purchaser and dealers who might be affected by the recall. Notification will begin 2 weeks from receipt of your reply to this letter and approval of the draft letter, and will be completed one week after notification is first sent.

8. Program for remedy campaign (including program for reimbursing any consumer who obtained the remedy at his/her own expense) of this report: See description of remedy campaign in Item 7, above. Reimbursement program is detailed in the enclosed customer notification letter.

**Denise**

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**From:** Denise  
**Sent:** Tuesday, April 17, 2012 2:08 PM  
**To:** 'rmd.odi@dot.gov'  
**Subject:** FW: Emailing: Image (7).tif  
**Attachments:** Image (7).tif

*5 pages*

Attn: Alex Ansley

Re-sending email from last week. Sorry for the delay. Let Brenda or I know whether or not you get all the pages. Should be 5.

Thanks  
Denise

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**From:** Denise  
**Sent:** Tuesday, April 17, 2012 2:05 PM  
**To:** Denise  
**Subject:** Emailing: Image (7).tif



U.S. Department  
of Transportation  
National Highway  
Traffic Safety  
Administration

1200 New Jersey Avenue SE  
Washington, DC 20590

MAY 02 2012

**Sent via USPS Certified Mail**

President / General Counsel  
Performance Trailers  
PO Box 463  
Mt. Pleasant, TX 75456

NVS-215aa  
EQ12-003  
11E-057

**Subject: Second Request for Information- Response Required**

Dear Sir or Madam:

On March 26, 2012, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving certain electric/hydraulic brake actuator pumps that the Dexter Axle Company sold to your company for further installation into motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter.

This letter is being sent in order to remind your company that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

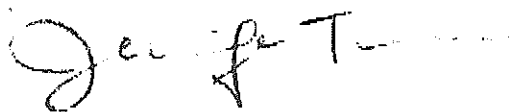


49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$6,000 per day, with a maximum of \$17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge your company to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid a potential enforcement action against the company in addition to substantial penalties for its failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov).

Sincerely,



Jennifer T. Timian  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures

# PERFORMANCE TRAILERS

P.O. Box 463 • Mt. Pleasant, Tx 75456  
Phone: (903) 572-0029 • Fax: (903) 572-0269

May 10, 2012

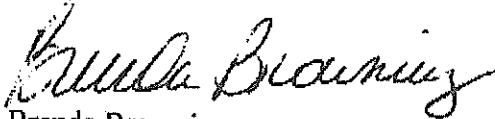
National Highway Traffic Safety Adm  
1200 New Jersey Avenue SE  
Washington, DC 20590

RE: EQ12-003

To Whom It May Concern:

I am sending you copies of my response that was emailed to [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov) on April 2, 2012 and again on April 17, 2012. I don't know why these were not received because my email did not show a failed to send message.

Thank You,



Brenda Browning  
Office Manager