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12V-298  
(7 Pages)



*The First Name In Trailers*

June 21, 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**
- **Brake System: Relay and Check Valve Schematic – Ref. No. 362645**

Respectfully submitted,



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

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

On **June 18, 2012** Utility Trailer Manufacturing Co. confirmed a condition that may relate to motor vehicle safety 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: **June 20, 2012**

Furnish the manufacturer's identification code for this recall (if applicable): **Not applicable**, 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: \_\_\_\_\_



**I. Identify the Vehicle Models Involved in the Recall**

<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.

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: 2013 Model(s): as follows: Dry Vans (Single axle, dual axle and tri-axle, commercial, semi refrigerated and dry vans)

Production Dates: Beginning: May 16, 2012 Ending: June 13, 2012

VIN Range: Beginning: 1UYVS2400DG Ending: 1UYVS2404DG

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

**Single Dry Van Order Manufactured with a Delay in the Brake Application Timing**

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. 25.3%

**II. Identify the Recall Population**

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

Model	Model Year	Number of Vehicles Potentially Involved
<u>VS2DX</u>	<u>2013</u>	<u>16</u>

Total Number Potentially Affected by the Recall: 16

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 installed a brake system check valve in the opposite direction of its intended installation. Utility learned of this issue within approximately 1 days of manufacturing the last trailer that had the improperly installed valve. Utility then conducted a record search of all trailers on which this type of brake system/valve was installed. Utility identified 16 trailers out of a 20-unit order, manufactured between May 16 through June 13, 2012, as having the valve installed incorrectly. Utility excluded four units of the twenty-unit order because the incorrect valve installation was rectified before the trailers left the factory. Utility excluded from the population other units that were built before or after the twenty-unit order because those units were built correctly as designed, and a brake-timing test confirmed the proper brake-application timing.

### 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 reversed the installation of a one-way check valve in the brake relay valve in trailers used for a “doubles operation” equipped with a pintle hook. Although the trailers brakes apply (as confirmed by brake actuation timing tests), the orientation of the check valve causes a slower-than-acceptable brake application. (Acceptable brake application for this type of system occurs within .50 seconds, whereas these brakes would apply at 1.6 seconds. Utility is authorizing an inspection and repair the affected units).

Also, see the attached brake schematic: (1 page)

Describe the cause(s) of the defect:

Utility installed a one way check valve into the brake relay valve in reverse position than its intent; see the attached brake schematic.

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

While the tractor brakes apply, the defect delays the brake timing of trailer brakes, increasing the length of distance in stopping.

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

A driver may notice a pause or brief delay in braking application.

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

NA

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

NA

### 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.

See #7: No defects, incidents, accidents, or injuries have been reported to Utility.

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.

On June 13, 2012, line assembly men notified Utility headquarters of a discrepancy in the brake installation instructions of the identified trailer order of twenty units (sixteen affected). The discrepancy was two conflicting sets of installation instructions: one set showed a one-way check valve preventing air flow into the brake relay valve (opposite direction of the system's intent); the other showed the one-way check valve directing air flow into the relay valve (as intended).

On June 14, 2012, plant test records showed initial brake timing tests not compliant with 49 Code of Federal Regulations, Part 571. 121 (Air Brake System) and later tests that were compliant. S5.3.3.1(a) – Brake Actuation Time test should reach 60 psi in not more than .50 seconds in the case of trailers designed to tow another vehicle equipped with brakes. S5.3.4(a) – Brake Release Time should reach 95 psi in not more than 1.00 seconds with the same type of trailers. The test records showed an initial brake actuation test time of 1.6 seconds and .7 seconds to release the brakes. This test confirmed that the discrepancy existed when applying the brakes, but not when releasing them. The valve was then installed in the correct orientation and retested; the system passed with a brake actuation test time of .26 seconds; the release application time was unaffected. These tests reconfirmed that the discrepancy was solved and all other variables that would contribute to slower brake times were ruled out.

On the same day, June 14, 2012, as a result of the tests, Utility responded swiftly to rectify the sixteen trailers. It tracked down each trailer and reoriented the valve, thereby fixing the problem and making the brake-actuation timing compliant.

On June 18, 2012, Utility confirmed the noncompliance.

As of June 20, 2012, all units have been confirmed as completely retrofitted; no defects, incidents, accidents, or injuries have been reported to Utility.

#### 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. Identify the "black" supply air one way check valve (plumbed into the relay valve) and reverse the position. The correct orientation of the check valve will allow proper air flow into the relay valve. The arrow on the check valve should be facing toward the relay valve.
  - b. Refer to the attached brake schematic.

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

- a. The arrow on the check valve should be facing toward the relay valve in its correct orientation.
- b. See the attached brake schematic.

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.

**This recall has been completed. The start date was June 14, 2012 and was completed on June 19, 2012. Utility does not intend to send notification as the recall has already been completed. No foreseeable problems with implementing and / or completing the recall occurred.**

#### **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.

**The customer has been notified of the recall and that it has been completed. The start date was June 14, 2012 and was completed was June 19, 2012. Utility does not intend to send notification as the recall has already been completed. No foreseeable problems with implementing and / or completing the recall occurred.**

#### **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.

