

PE12-014

12V-410
11 Pages

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Report

Date: August 14, 2012

This report serves as Kaufman Trailers notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a “defect related to motor vehicle safety” exists in certain 2011, Kaufman Trailer units with a GVWR of 25,900. Kaufman Trailers decided that this “defect” existed in these vehicles on some units with a manufacturer date in the year of 2011.

I. Manufacturer, Designated Agent, and Other Chain of Distribution Information

Manufacturer’s corporate name: Kaufman Trailers

Vehicle brand or trademark name owner(s) (where applicable): Kaufman

Designated Agent (imported vehicles):

N/A

If this notification concerns a defective or noncompliant component that the above identified manufacturer did not manufacture, identify that component and provide the name, address, and phone number of the manufacturer of the component (if this manufacturer is unknown, provide this information as to the supplier of the component):

N/A

Name, address, email, and phone and fax numbers for the person(s) to whom inquiries about this report should be directed:

Daniel Eddinger – 336.790.6800 ext. 2756

Manufacturer's assigned campaign number (where applicable):

II. Identification of the Recall Population and Its Size

Complete the tables below for each group of trailers subject to this notification. Additional tables may be necessary where there are more than three groups subject to a notification.

Make: Kaufman
Model: 2011, 25,900 GVWR - Various Models equipped with 10,000 lb. Oil Bath Axles
Model Year(s): 2011
Inclusive dates of manufacture (month and year): September 1, 2010 – August 31, 2011
Body Style/Type (for non-passenger cars): Equipment/Flatbed Trailer
Other information necessary to describe these vehicles (e.g., VIN range, GVWR or class for trucks, displacement for motorcycles, and number of passengers for buses): Equipment Trailers (Pintle/Gooseneck Pull), 10,000 electric Oil Bath Axles, 25,900 GVWR
Total number of these trailers: 302 (604 axles)

Make:
Model:
Model Year(s):
Inclusive dates of manufacture (month and year):
Body Style/Type (for non-passenger cars):
Other information necessary to describe these vehicles (e.g., VIN range, GVWR or class for trucks, displacement for motorcycles, and number of passengers for buses):

Total number of these vehicles:

Make:
Model:
Model Year(s):
Inclusive dates of manufacture (month and year):
Body Style/Type (for non-passenger cars):
Other information necessary to describe these vehicles (e.g., VIN range, GVWR or class for trucks, displacement for motorcycles, and number of passengers for buses):
Total number of these vehicles:

Provide the following information as to all the groups of vehicles:

Grand total number of Trailers: 302

The percentage of the recall population you estimate actually contain the defect or noncompliance: 5-7% maximum

Identify and describe how the recall population was determined (e.g., on what basis the recalled models were selected and how the inclusive dates of manufacture were determined):

The Preliminary Evaluation (PE12-014) recommended that Kaufman Trailer audited warranty claims for all 2011 manufactured trailers with a GVWR of 25,900. Once these records were audited, Kaufman Trailers felt for the safety of our consumers that a voluntary recall should be done in order to correct the problems detailed in the attached letter. Kaufman Trailers found that the problems referenced occurred on some models produced in 2011. In order to capture these models, the recall is in effect for ALL of 2011 of models that fit within the aforementioned criteria.

Describe how the recall population is different from any similar vehicles not subject to this notification:

The recall is only specific to a particular size/brand of 10,000 oil bath axle. In many cases the axle is working properly. However, Kaufman Trailers wishes to ensure that all axles within the listed criteria previously specified, are operating properly.

III. Description of the Defect or Noncompliance and Chronology of Events

Describe the defect or noncompliance, including a summary and detailed description of the nature and physical location (if appropriate) of the defect or noncompliance. Graphic aids should be provided where necessary.

In the audit process, there were evidences (as described in the attachment) that showed the outer wheel end "cap" on oil bath axles were leaking. In some cases, this could be from a cracked wheel end "cap" or a damaged O-Ring. In most cases, the wheel end "cap" and/or "O-Ring" was working properly. (See attached pictures for further clarification)

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

There were some of the referenced wheel end "caps" that might have been "over-tightened" at the time of assembly. This may have caused the wheel end "cap" to be under "stress" and eventually crack. In many cases the wheel end "cap" seemed to be tightened correctly and/or working properly with no signs of stress. As a precautionary measure, when replacing wheel end

“caps” that are showing signs of “leaking”, replacing the “O-Ring” with in the wheel end “cap”
at the same time, adds additional preventative “insurance” to correcting the problem.

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

If wheel end "cap" is visibly leaking lubrication/oil, the customer should stop using the trailer immediately and contact Daniel Eddinger at 336-790-6800 ext. 2756. Failure to stop using the trailer, may result in wheel-bearing failure on the trailer.

Identify any warning(s) that may precede the defect or noncompliance condition.

Visible leaking of lubrication/oil from wheel end "cap".

For defects, provide a dated, chronological summary of all the principle events that were the basis for the determination that the defect is related to motor vehicle safety, including a summary of all warranty claims, field or service reports, and other information such as numbers of crashes, injuries and fatalities.

Attached Spreadsheet details the number of trailers affected out of the total number manufactured within the specified time frame. (Includes examples/copies of claims/cases)

For noncompliances, identify the test results and other information considered in determining the existence of the noncompliance, and provide the date of each test and observation indicative of that noncompliance.

N/A

IV. The Remedy Program and Its Schedule

Describe the program for remedying the defect or noncompliance, including the plan for reimbursing those owners and purchasers who may have incurred costs to remedy the defect or noncompliance before receiving the manufacturer's notification concerning that defect or noncompliance. Also include, where applicable, details with dates concerning any production remedy that was conducted or will be conducted.

A company representative of Kaufman Trailers will receive calls from customers. He will also contact every applicable customer to inquire and hopefully attain pictures of the wheel end "caps" on the trailer, to identify if the wheel end "cap" and O-Ring needs to be replaced. Every call/case will be documented. If the picture and/or customer indicates there is any "leakage" of lubricant from the wheel end "cap" --- the company will provide a solution for the customer, involving labor cost and where installation of replacement wheel end "cap" and O-Ring work is done. For customers who are able to bring a trailer to Kaufman Trailers North Carolina or Nebraska facility, the parts and labor will be handled by the company. This will be handled on a "case-by-case" basis due to several factors such as, location of trailer, proximity of trailer to an adequate repair facility and schedule flexibility of the customer.

Provide the estimated date(s) on which owner and purchaser notifications will be issued and the estimated date(s) for completion of those notifications.

Recall notice letter and instructions will be mailed by USPS to all customers no later than September 5, 2012.

Estimated completion of all recalls to be satisfied will be completed by March 31, 2013.

Provide the estimated date(s) on which dealer and distributor notifications will be issued and the estimated date(s) for completion of those notifications.

N/A

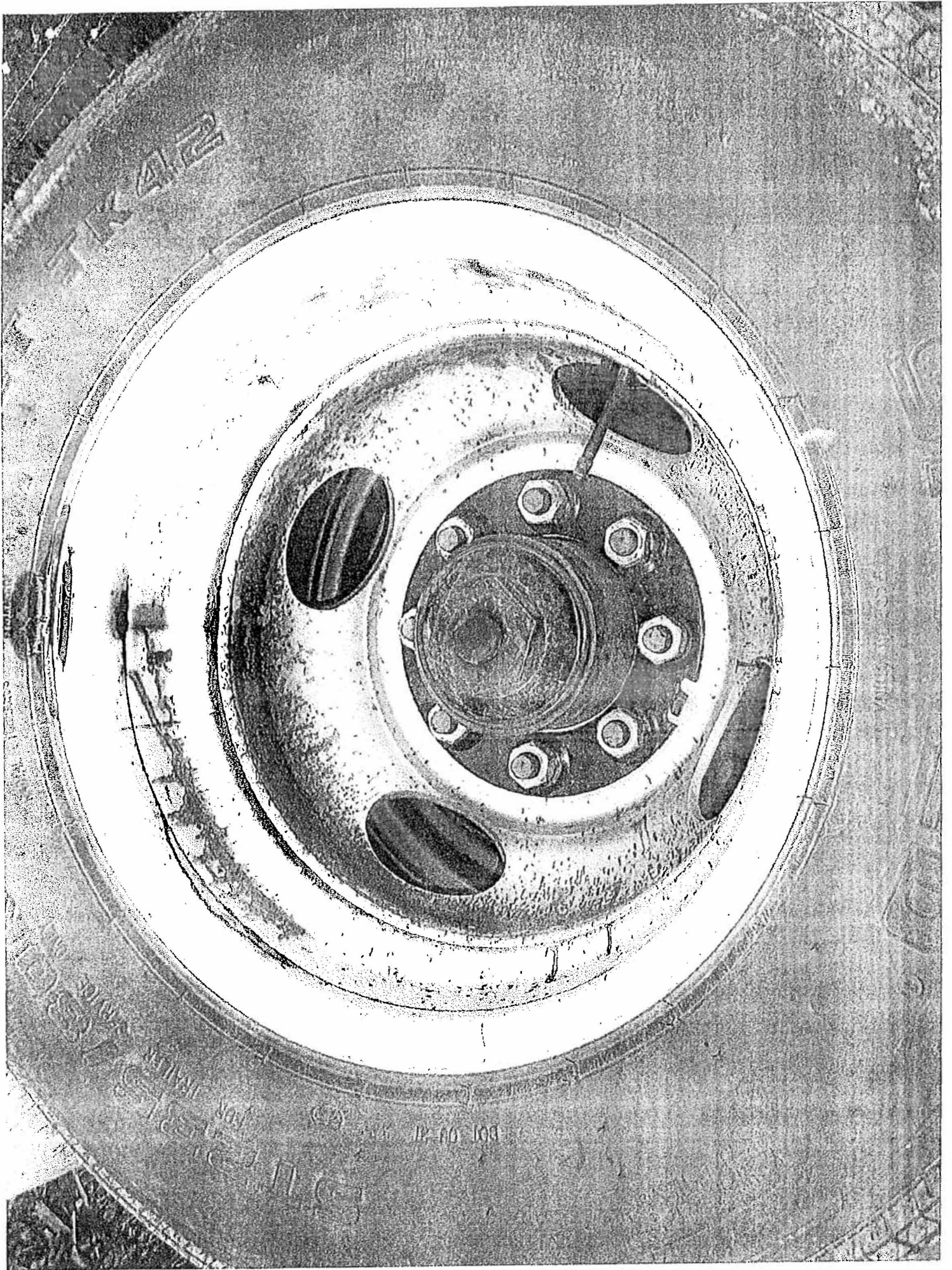
Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

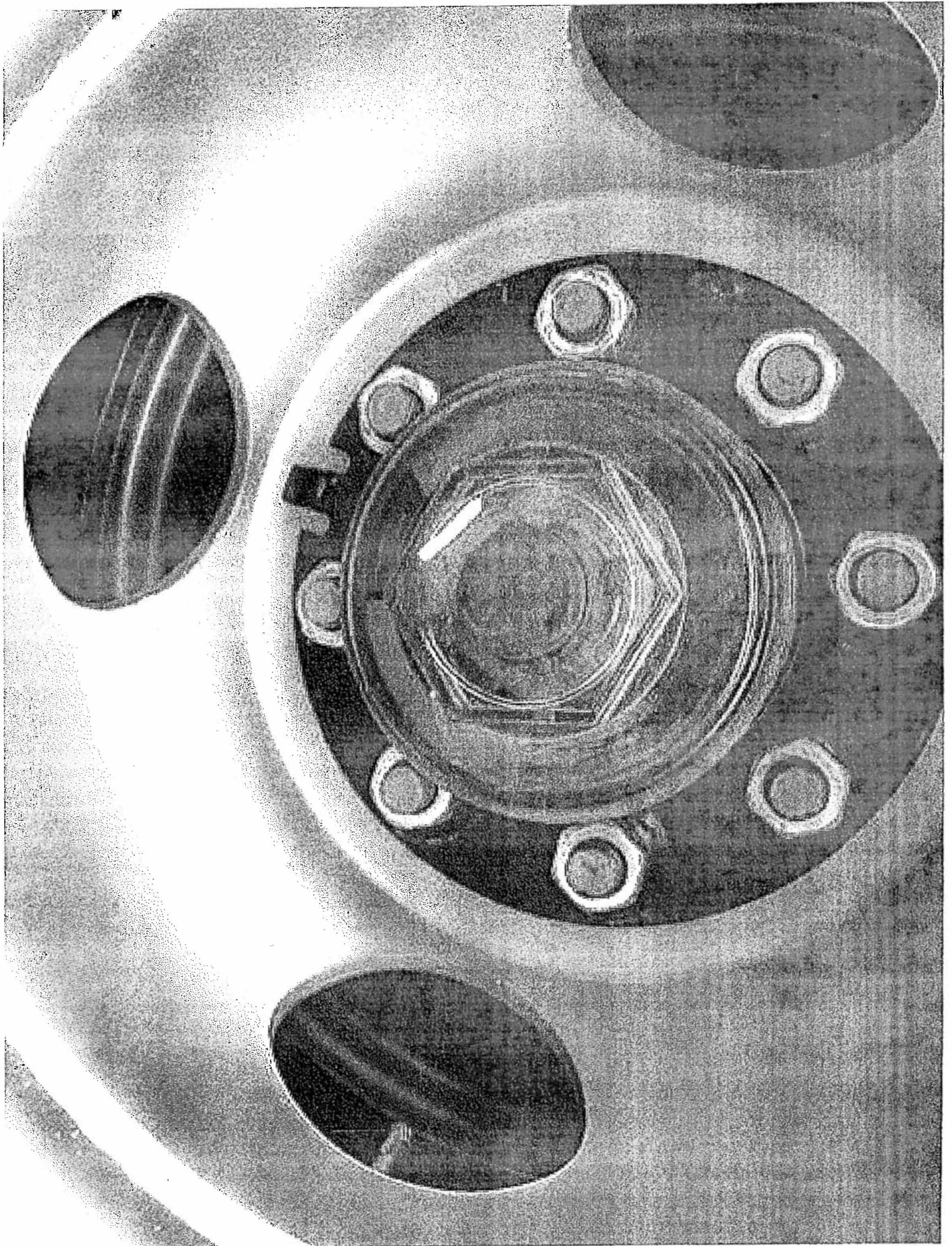
The replacement wheel end "cap" will look very similar if not identical to the one being replaced.

******* IMPORTANT REMINDERS *******

A DRAFT version of the letter that the manufacturer intends to mail to owners and purchasers notifying them of the defect and/or noncompliance must be submitted to NHTSA at least five Federal Government business days before those letters are issued. In addition, it is recommended that the draft version of the letter that the manufacturer intends to send to its dealers and distributors concerning the defect and/or noncompliance also be submitted for review. For prompt receipt and review, drafts may be submitted to the attention of the Recall Management Division (NVS-215) via facsimile on (202) 366-7882, or email to RMD.ODI@dot.gov.

A representative 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, dealer, or purchaser, must be submitted to NHTSA no later than five days after they are initially sent. This requirement applies both to the final version of the notification letter that is sent to owners and purchasers, as well as the final version that is sent to dealers and distributors. It also includes any follow-up notifications issued concerning a recall. The representative copies of the letters sent to owners and purchasers, and dealers and distributors, must be submitted via certified mail. It is strongly recommended, however, that additional representative copies be submitted via facsimile on (202) 366-7882, or email to RMD.ODI@dot.gov, so that the submission can be more promptly reviewed. All submissions should be conspicuously labeled with the appropriate NHTSA-assigned recall number.





July 24, 2012

Nate Seymour
National Highway Traffic Safety Administration
Office of Defects Investigation
1200 New Jersey Ave. SE
Washington, DC 20590

PE12-014

Mr. Seymour:

I have compiled the information we last spoke about on Friday, July 13, 2012. From our conversation and the letter we received from you (NHTSA) this listing includes all 2011 Kaufman 25,900 GVWR trailers sold in the United States.

According to the data acquired, there were a total of 302 units sold according to the above listed criteria, and when making the assumption that each of the units had 2 axles per unit, it is assumed that there are 604 axles in the "field".

Our data also showed that we had a total of 14 cases relevant to "wheel end" failure, which is around 2.25% of the axles sold. In looking at these cases, we have concluded that the trouble was from a leaking wheel end oil-cap, or defective "O-Ring". Obviously, if the oil leaks from the axle and is not noticed and replenished, it will result in bearing failure.

We are seriously concerned with these failures. Again, we believe that in most cases, the failure was caused by loss of lubrication of the bearings. We are open to discussing with NHTSA what should be done. We believe that a "recall" would center around the glass end-cap, rubber plug, and O-Ring that seals the oil in.

We await your response and direction on what and how to proceed.

Sincerely,



Tom Lilly
Kaufman Trailers