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August 19, 2013

This report serves as Silver Eagle Manufacturing Company's notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a defect related to motor vehicle safety exists in certain Trailer Converter Dollies. Silver Eagle decided that this defect existed in these vehicles on August 13, 2013.

I. Manufacturer, and Other Chain of Distribution Information

Manufacturer's corporate name:

Silver Eagle Manufacturing Company
5825 NE Skyport Way
Portland, OR 97218

Vehicle brand or trademark name owner:

Silver Eagle (Same as above)

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Campaign Number:

Axle Supplier:

KIC Group
3800 Fruit Valley Road
Vancouver, WA 98660
Phone: (360) 823-4440

II. Identification of the Recall Population and Its Size

There are 155 total potential Model Year 1999-2001 Converter Dollies with the "Top Center Hole" on the bottom of the axle.

Make: Silver Eagle
Model: VAST20W
Model Year(s): 1999, 2000, 2001
Inclusive dates of manufacture: 05/1999, 07/1999, 03/2000, 07/2000
Body Style/Type: Converter Dolly
Other information necessary to describe these vehicles:
VIN Range: 1U3JX8012XBJ00436 – 1U3JX8016XBJ00505 1U3JX8010YBJ00727 – 1U3JX8016YBJ00778 1U3JX78101BK00864 – 1U3JX78131BK00888
Total number of these vehicles: 147

Make: Silver Eagle
Model: CSL20W
Model Year(s): 2001
Inclusive dates of manufacture: 08/2000, 09/2000, 10/2000
Body Style/Type: Converter Dolly
Other information necessary to describe these vehicles:
VIN Range: 1U3JE84181BJ00030 – 1U3JE84131BJ00033 1U3JE88181BJ000337 1U3JE96171BN00034 – 1U3JE96101BN00036
Total number of these vehicles: 8

The 155 converter dollies above have axles supplied by KIC in Vancouver, Washington. It is unclear at this time how many of the 155 axles installed in the above dollies will have a center hole on the bottom of the beam. No other converter dollies manufactured by Silver Eagle have KIC axles, and therefore not suspected to have this defect.

III. Description of the Defect and Chronology of Events

Silver Eagle was notified May 22, 2013 by SYSCO Foodservices in Walnut, California that it had a failed axle on a Model Year 2001 converter dolly produced in October of 2000.



A replacement axle was sent to the customer, and the original axle was sent to Silver Eagle in late July for inspection and failure analysis.

The failed axle shows classic signs of a fatigue failure starting at the bottom of the axle, and radiating upward over a long period of time. The point of initiation was the center hole. Center holes are used to establish Top Dead Center; the hole being at the bottom is not a proper practice because it

causes a stress riser in the tension side of the beam.

The customer was immediately called, and requested to inspect their other two dollies for bottom located center holes and possible cracking. On August 13, 2013 SYSCO confirmed that a second dolly had the misplaced center hole and cracking had initiated, and on August 15, 2013 the third dolly was confirmed to be the same. SYSCO has placed #2 and #3 out of service pending replacement and repair.

There have been no accidents or other reports of similar cracks in axles. As seen in the picture above, the crack eventually becomes obvious during inspection that the part is beginning to fail, additionally the wheels, tire and axle will begin to show negative camber. This form of failure happens over a long period of use, as evidenced by it taking twelve and a half years to get to this state.

If the axle were to completely fail, and crack in half, the dolly could steer erratically, causing swerving and possible roll over.

IV. Remedy Program and Schedule

There was one original sale to a fleet, and the four original sales to dealers. The SYSCO dollies described above was one of the dealer sales. Notifications are planned to be sent to both the successor of the original fleet, and the four dealers within a week of NHTSA's assignment of a recall number and successive approval of the Draft Notification Letter.

Because the vehicles in question are over ten years old, Silver Eagle is not under obligation to provide a free remedy. However, Silver Eagle plans to provide an unused replacement axle beam for no charge, or a \$500.00 credit towards a new converter dolly if they scrap their dolly with the incorrect position center hole. The current vehicle owner will be responsible for the labor to install the replacement axle beam. Only converter dollies that have a bottom center hole will need replacement to ensure continued safe operation.

Replacement parts will likely be from Meritor and will not have a center hole in the bottom. The last Silver Eagle dolly to use a KIC axle was manufactured in October of 2000, no other converter dollies are suspected to have this defect.

I look forward to NHTSA's response, and Silver Eagle will work diligently to perform this recall in a quick and efficient manner.

Sincerely,



Gary Gaussoin
President