

RECEIVED

By Recall Management Division at 9:27 am, Sep 30, 2013

13V-478
(7 pages)

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Report

Date: 9/19/2013

This report serves as THE ALUMINUM TRAILER COMPANY'S notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a : "defect related to motor vehicle safety"

Vehicle Safety Standards"] exists in certain [CARGO TRAILERS]. THE ALUMINUM TRAILER CO. decided that this : "defect" | existed in these vehicles on JANUARY 2006, TO APRIL 2013.

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

Manufacturer's corporate name: Aluminum Trailer Company

Vehicle brand or trademark name owner(s) (where applicable): Various Models built by the Aluminum Trailer Company: Quest, RSX, Raven

Designated Agent (imported vehicles): Aluminum Trailer Company

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):

Fastec Industrial Corp., a division of WESCO Distribution, Inc.

225 West Station Square Drive, Suite 700

Pittsburgh, PA 15219 - 1122

412 - 454 - 2554

Bryan D. Kocher
Senior Counsel
bkocher@wesco.com
412 - 454 - 2554

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

Aluminum Trailer Company
306 S. Nappanee St. PO Box 396
Nappanee, IN 46650
Phone: 574 - 773 - 2440
Fax: 574 - 773 - 7769

Attention: Tom Vanderputten
Manufacturer's assigned campaign number (where applicable):
EQ 13-006

II. Identification of the Recall Population and Its Size

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

Make: Aluminum Trailer Company
Model: Quest, RSX, Raven
Model Year(s): 2008 to 2013
Inclusive dates of manufacture (month and year): January 2008 to April 2013
Body Style/Type (for non-passenger cars): Cargo Trailers
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: 4,295

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 vehicles: 4,295

The percentage of the recall population you estimate actually contain the defect or noncompliance: 10 %

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):

Received letter from NHTSA that Fastec initiated a recall and that the Aluminum Trailer Company had received 3,855 of these locks. Since this is not serialized or recorder part we needed to include all trailer built in the period we purchased the locks.

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

The recall population includes every trailer that was manufactured by the Aluminum Trailer Company during the time we purchased the locks.

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 letter dated July 11, 2013, Fastec notified the NHTSA that it decided a defect exists in the model number door locks identified above and manufactured between January 2006 and April 2013 with a keyed paddle handle and deadbolt. It may be possible to remove the key from the lock while it is in a horizontal, 9 o'clock position, potentially jamming the deadbolt. If the key is removed while in the 9 o'clock position, the interior side of the door lock may be inoperable. A passenger inside the recreational vehicle may not be able to exit the vehicle without using the emergency exit for the risk of injury. This matter was assigned recall 13E-039.

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

A passenger inside the recreational vehicle may not be able to exit the vehicle without using the emergency exit, increasing the risk of injury.

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

There are no warnings that would proceed the defect.

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.

According to a letter from NHTSA the Aluminum Trailer Company received 3,855 possibly defective locks from Fastec.

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.

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.

- 1) Fastec will give consumers instructions on how to identify the defective locks.
 - 2) Fastec will give consumers of have affected locks instructions to test for the defect.
 - 3) Fastec will advise consumers how to use the lock if it has a defect.
 - 4) Fastec will provide new locks to the consumers to replace the defective lock.
-
-

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

Fastec has notified the Aluminum Trailer Company that they will notify our customers by direct mail after we furnish Fastec with a mailing list of possible affected customers. We will have the mailing list to Fastec by 9/30/2013.

Fastec should complete the direct mailings by 11/30/2013.

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

Fastec has notified the Aluminum Trailer Company that they will notify our dealers by direct mail after we furnish Fastec with a mailing list of possible affected dealers. We will have the mailing list to Fastec by 9/30/2013.

Fastec should complete the direct mailings by 11/30/2013.

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

There are no identifiable distinguishing characteristics.

***** 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.