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By Recall Management Division at 3:43 pm, Oct 17, 2013

13V-479  
(7 pages)

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CYNTHIA GLASS  
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This letter is in regards to the Safety Recalls EQ 13-006 & 13E-039. Enclosed you will find the PART 573 form filled out, copies of the letters we will be sending to our Dealers and last known retail customer we have in our records notifying them of this campaign and instructions on how they should proceed in getting the issue resolved. Also included is the complete list of all trailers we manufactured using the Fastec handles and key cylinders listed in the recall notice. Any customer that we have shown only a phone # for currently reside in our general area near the factory and we call them and either direct them to the Fastec website or schedule an appointment for them to bring their trailers here to the factory for the repair. If you have any questions or concerns regarding this information, please feel free to contact me by phone (352) 529-2190 or via e-mail at john@shadowtrailer.com.

John Ryan/Shadow Trailers, Inc.

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Report

Date:  \_\_\_\_\_ 09-27-2013

This report serves as [insert reporting manufacturer's name]'s notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a [insert as applicable: "defect related to motor vehicle safety" or "noncompliance with Federal Motor Vehicle Safety Standards"] exists in certain [identify the vehicles at issue]. [Manufacturer] decided that this [insert "defect" or "noncompliance," as applicable] existed in these vehicles on [insert date].

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

Manufacturer's corporate name: Shadow Trailers, Inc.

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

Designated Agent (imported vehicles):



Shadow gooseneck and bumperpull horse trailers manufactured between 12-01-2005 and 08-11-2011 with the key cylinder #'s: HF 304, HF 307, HF 308 and HF 309.

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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):

Black travel trailer flush mounted locks manufactured by Fastec Corporation with the above listed key cylinders.


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


John Ryan/Shadow Trailers, Inc. Phone: (352) 529-2190,  Fax: (352) 529-2185,

E-mail: john@shadowtrailer.com.

Manufacturer's assigned campaign number (where applicable):  N/A

## 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:	Shadow Trailer
Model:	Gooseneck, Bumperpull Horse Trailers
Model Year(s):	2006-2012 
Inclusive dates of manufacture (month and year):	12-05-2006 through 08-11-2011
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):	N/A
Total number of these vehicles:	786

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: 786 

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):  
Shadow Trailers completes a key cylinder and lock tracking # for each trailer it manufactures. Based on the information from Fastec Corporation a complete review of all trailers manufactured between the dates listed on recall notice was conducted.



Describe how the recall population is different from any similar vehicles not subject to this notification:  
Only the trailers with the lock #'s listed on the recall notice were included.

### 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.

The key on the listed potentially defective locks can be removed when in the 9:00 position, thereby making the deadbolt inoperable from inside the trailer.



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

See above comments

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

A person may not be able to exit the trailer under normal or emergency conditions.



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

None that we are aware of.

*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.

See attached copies

*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.

See attached copies

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.

Shadow Trailers, Inc. will begin notifying its Dealer network and Customers that have been identified immediately upon NHTSA approval of this reply. Shadow will request that trailers on attached list marked as

unknown, be tracked by last known owner (dealer) by VIN. Shadow Trailers, Inc. will in a letter and/or e-mail notify dealers and customers to go to the Fastec website for specific instructions on how to check for defects on product and how to schedule repair (if needed).

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

09-30-2013 through 10-04-2013

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

09-30-2013 through 10-04-2013

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

Key cannot be removed when in the 9:00 position.