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PART 573 Defect and Noncompliance Report

Date: February 6, 2014

This report serves as Three Feathers Manufacturing, LLC's notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration ("NHTSA") that a defect related to motor vehicle safety exists in certain trailer locks supplied by Fastec Industrial Corp., a division of WESCO Distribution, Inc., for installation in the doors of cargo hauler trailers, campers, tear drop trailers, and camping trailers. Additional information concerning the recalled locks can be found in Fastec's Part 573 Report that was filed separately on July 11, 2013 with an assigned NHTSA Recall# 13E006.

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

Filing Firm Name: Three Feathers Manufacturing, LLC
Contact: Mel Sandland
Address: 62415-C Hwy 82 / PO Box 684, La Grande, OR 97850
Phone: (541) 663-8163
Fax: (541) 663-8160
Email: mel@threefeathersmfg.com

Vehicle brands involved: Backpacker 2, Backpacker 2XT, Backpacker, Buckboard, Cargo Hauler, 5th-Wheel Cargo Hauler, Pinecone Tear Drop, Mule Cargo Hauler, Pelican Cargo Hauler, Tumbleweed Tear Drop, Tumbleweed Camper, and various Custom Builds

This notification concerns a defective component that the above identified manufacturer did not manufacture.

Component: Certain trailer locks with a keyed paddle handle and deadbolt (the "locks") installed in the doors of trailers. Only FIC locks that have an integrated deadbolt are affected by this recall.

Importer/Distributor: Fastec Industrial Corp.
2219 Eddie Williams Road
Johnson City, TN 37601

Manufacturer: Zhongshan Huafeng Locks Co., Ltd.
South of Yongning Industrial Avenue
Xiaolan Town, Zhongshan, Guangdong
People's Republic of China

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II. Identification of the Recall Population and Its Size

Make: Mule Cargo Hauler

Models: Various starting with TFMC...

Model Year(s): 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014

Inclusive dates of manufacture (month and year): October 2006 – February 2014

Body Style/Type: Enclosed Cargo Trailer

Total number of these vehicles: 204

Make: Backpacker 2

Models: TF2BP510.5A1, TF2BP6.512A1

Model Year(s): 2012, 2013, 2014

Inclusive dates of manufacture (month and year): February 2012 – February 2014

Body Style/Type: Enclosed Cargo Trailer

Total number of these vehicles: 24

Model: TF2BPXT510.5A1

Model Year(s): 2014

Inclusive dates of manufacture (month and year): October 2013 – February 2014

Body Style/Type: Enclosed Cargo Trailer

Total number of these vehicles: 1

Make: 5th Wheel Cargo Hauler

Model: TF5W8.528A2

Model Year(s): 2010

Inclusive dates of manufacture (month and year): June 2010 – August 2010

Total number of these vehicles: 1

Make: Buckboard Cargo Hauler

Models: Various – Starting with TFBB...

Model Year(s): 2009, 2010, 2011

Inclusive dates of manufacture (month and year): May 2009 – February 2014

Body Style/Type: Enclosed Cargo Trailer

Total number of these vehicles: 93

Make: Backpacker

Models: TFBP513A1, TFBP58.5A1, TFBP58A1, TFBP610A1, TFBP68A1

Model Year(s): 2009, 2010, 2011, 2012, 2013

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Inclusive dates of manufacture (month and year): February 2009 – February 2014

Body Style/Type: Enclosed Cargo Trailer

Total number of these vehicles: 36

Make: Pinecone Tear Drop Trailer

Models: TFLC58A1, TFPC58.5A1, TFPC58.5A1K, TFPC58A1K

Model Year(s): 2008, 2009, 2010, 2011, 2012, 2013, 2014

Inclusive dates of manufacture (month and year): September 2008 – February 2014

Body Style/Type: Tear Drop Trailer

Total number of these vehicles: 98

Make: Pelican Cargo Hauler

Model: Various Starting with TFPL...

Model Year(s): 2010, 2011

Inclusive dates of manufacture (month and year): May 2010 – October 2010

Body Style/Type: Cargo Hauler Trailer

Total number of these vehicles: 10

Make: Cargo Hauler Shell - No Chassis

Model: TFSHELL56

Model Year(s): 2008

Inclusive dates of manufacture (month and year): August 2008

Body Style/Type: Enclosed Cargo Trailer

Total number of these vehicles: 1

Make: Tumbleweed Tear Drop Trailer

Model: TFTW58A1, TFTW510.5A1

Model Year(s): 2012, 2013

Inclusive dates of manufacture (month and year): October 2011 – February 2013

Body Style/Type: Tear Drop Trailer

Total number of these vehicles: 8

Make: Tumbleweed Camper

Model: TUMBLEWEED

Model Year(s): 2011

Inclusive dates of manufacture (month and year): March 2011 – June 2011

Body Style/Type: Camper

Total number of these vehicles: 5

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Make: Custom Cargo Trailer
Model: Mobile Medical Trailer
Model Year: 2011
Inclusive dates of manufacture (month and year): June 2011 – August 2011
Body Style/Type: Cargo Trailer
Total number of these vehicles: 1

Make: Custom Camper
Model: Custom Camper
Model Year: 2010
Inclusive dates of manufacture (month and year):
Body Style/Type: Camper
Total number of these vehicles: 1

Grand Total Number of Vehicles built by Three Feathers Manufacturing, LLC since January 2006 that could potentially have the defective lock is: 480

Three Feathers Manufacturing, LLC is not able to determine the exact percentage that is affected by the defective lock. However, Emmitt Doors believes it sold 10 doors with the defective locks to Three Feathers, LLC and Lippert believes it sold 147 doors to Three Feathers with the defective locks which in estimation would be: 33%.

Three Feathers Manufacturing, LLC was notified of a recall of Fastec's defective locks in a letter from the NHTSA dated November 20, 2013 (Emmit Doors – EQ13-039) and another letter dated December 17, 2013 (Lippert – EQ13-067).

III. Description of Issue and Type of Hazard

The defective locks have a potential jamming issue within the deadbolt cylinder. If a lock is affected, the key may be able to be removed from the locked door when the key in the deadbolt cylinder is in the horizontal 9 o'clock position, potentially jamming the deadbolt and potentially causing the red lever on the interior side of the lock to become inoperable. In that event, a person inside the trailer or camper may not be able to unlock and open the RV door, but he or she could still exit the vehicle from the emergency exit (if one is present).

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IV. The Remedy Program and Its Schedule

Upon notification of this issue, Three Feathers has contacted Fastec. They confirmed they are in the process of notifying all consumers who have registered their vehicles with the DMV. Three Feathers will also provide a list of VINs to Fastec in order for Fastec to notify consumers and dealers that have not registered their vehicles. Three Feathers will coordinate the recall efforts with Fastec and will refer consumers to Fastec for free replacement of the cylinders in any affected locks as described more fully in Fastec's Part 573 Report.

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