



STRICK TRAILERS, LLC

225 Lincoln Highway

Fairless Hills

Pennsylvania, USA

19030.0009

215.949.3600

October 7, 2014



VIA RECALL PORTAL

Associate Administrator for Enforcement
Attention: Recall Management Division (NVS-215)
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Safety Defect Report

Dear Administrator:

Please be advised that Strick Trailers, LLC ("Strick Trailers") has determined that a noncompliance with Federal Motor Vehicle Safety Standards exists in the vehicles listed in the attached spreadsheet and is furnishing notification to the National Highway Traffic Safety Administration in accordance with Title 49 of the Code of Federal Regulations, Part 573, Sec. 573.6:

1. Full corporate name of the fabricating manufacturer:

Strick Trailers, LLC
301 N. Polk Street
Monroe, IN 46772

Inquiries regarding this report may be directed to:

Shari M. Solomon, Esq.
General Counsel
Diamatrix, Inc.
225 Lincoln Highway, Suite 201
Fairless Hills, PA 19030
ssolomon@diamatrix.net
P: (215) 949-4768
F: (215) 949-4769

2. Identification of the recall population: The recall population includes all Strick single axle fixed suspension dry freight van trailers equipped with a Strick rear impact guard that uses gusset part



Associate Administrator for Enforcement
October 7, 2014
Page 2

numbers 40033/40034, 43191/43192, 63133/63134 or 67046/67047. Trailers equipped with these rear impact guard gussets were manufactured between April 2008 and June 2014. The attached spreadsheet sets forth the make, model, model years, vehicle identification numbers and manufacturing dates of the recalled vehicles. The recall population was determined through identification of all vehicles whose rear impact guard incorporates gusset part numbers 40033/40034, 43191/43192, 63133/63134 or 67046/67047.

3. The total number of vehicles in the recall population: 29, as listed on the attached spreadsheet.

4. Estimated percent with noncompliance: The percentage of vehicles estimated to contain the noncompliance is 100%.

5. Description of noncompliance: The rear impact guards using gussets 40033/40034, 43191/43192, 63133/63134 or 67046/67047 do not meet the standards set forth in FMVSS 223. This could increase the risk of injury in the event of a rear impact crash.

6. Chronology of events:

(a) On July 22, 2014, Strick Trailers determined that the design of a rear impact guard using gussets 40033/40034, 43191/43192, 63133/63134 or 67046/67047 may not have been verified using prescribed test procedures.

(b) On September 30, 2014, Strick Trailers tested a rear impact guard assembly containing gussets 63133 and 63134. The test was conducted in accordance with the procedures set forth in FMVSS 223. Analysis of the test results indicated that the assembly did not meet the requirements of FMVSS 223. Strick Trailers determined that gusset design numbers 40033/40034, 43191/43192 and 67046/67047 were similar enough to 63133/63134 to warrant the inclusion in this recall of rear impact guards using these gusset designs.

(c) Between September 30, 2014 and October 7, 2014, Strick Trailers confirmed the population of vehicles whose rear impact guard incorporates gussets 40033/40034, 43191/43192, 63133/63134 or 67046/67047.

(d) On October 8, 2014, Strick Trailers will begin the process of identifying and testing an appropriate remedy. Remedy alternatives under consideration include reinforcement of the existing rear impact guard or replacement of the rear impact guard gussets.

7. Remedy plan: Strick Trailers intends to supply and pay for the installation of reinforcements to the rear impact guard or, alternatively, the replacement of the rear impact guard gussets, depending on the outcome of the remedy design and testing program. The remedy plan will be set forth in greater detail in the proposed customer notification letter to be provided to NHTSA within 45 days from the date hereof. Strick Trailers will notify all affected customers within 5 days of NHTSA's approval of the proposed customer notification letter.



Associate Administrator for Enforcement

October 7, 2014

Page 3

8. Representative communications: The proposed form of customer notification letter will be provided to NHTSA for approval within 45 days from the date hereof.
9. Manufacturer's campaign number: Not yet assigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Shari M. Solomon", written over a horizontal line.

Shari M. Solomon
General Counsel

SMS:dd

Enc.

<u>Customer</u>	<u>Vins</u>	<u>Make</u>	<u>Model</u>	<u>Model Year</u>	<u>Date of Manufacture</u>	<u>Model Description</u>
Bridgestone	1S11E9320CE525889	Strick	S432OE99NFW	2012	10/25/11	Single axle 32 foot van trailer
Bridgestone	1S11E9327CE525890	Strick	S432OE99NFW	2012	10/25/11	Single axle 32 foot van trailer
Bridgestone	1S11E9329CE525891	Strick	S432OE99NFW	2012	10/18/11	Single axle 32 foot van trailer
Bridgestone	1S11E9320CE525892	Strick	S432OE99NFW	2012	10/24/11	Single axle 32 foot van trailer
Bridgestone	1S11E9322CE525893	Strick	S432OE99NFW	2012	10/17/11	Single axle 32 foot van trailer
Master Fleet	1S11E9224EE529528	Strick	Z4220E38FNFSW	2014	08/27/13	Single axle 22 foot van trailer equipped with 12" I-Beam Bogle and pintle hook
Master Fleet	1S11E9226EE529529	Strick	Z4220E38FNFSW	2014	08/27/13	Single axle 22 foot van trailer equipped with 12" I-Beam Bogle and pintle hook
CAPITOL CITY TRAILERS INC	1S11E92849E523464	Strick	S4280E99NSWO	2009	04/25/08	Single axle 28 foot van trailer
CAPITOL CITY TRAILERS INC	1S11E92869E523465	Strick	S4280E99NSWO	2009	04/25/08	Single axle 28 foot van trailer
CAPITOL CITY TRAILERS INC	1S11E92889E523466	Strick	S4280E99NSWO	2009	04/25/08	Single axle 28 foot van trailer
CAPITOL CITY TRAILERS INC	1S11E928X9E523467	Strick	S4280E99NSWO	2009	04/25/08	Single axle 28 foot van trailer
CCT/SEAT CONSULTANTS	1S11E9285AE524062	Strick	S4280E99NFW	2010	03/10/09	Single axle 28 foot van trailer
EAU CLAIRE/EAST SIDE	1S11E9285CE525604	Strick	M4280E99NFWO	2012	07/18/11	Single axle 28 foot van trailer
EAU CLAIRE/EAST SIDE	1S11E9287CE525605	Strick	M4280E99NFWO	2012	07/27/11	Single axle 28 foot van trailer
MASTELL/EAST SIDE	1S11E92899E523928	Strick	M4280E99NFW	2009	10/22/08	Single axle 28 foot van trailer
MASTELL/EAST SIDE	1S11E92809E523929	Strick	M4280E99NFW	2009	11/10/08	Single axle 28 foot van trailer
NEW HAMPSHIRE/GRIFFIN	1S11E9327CE525257	Strick	Q4320E99NFW	2012	03/22/11	Single axle 32 foot van trailer
NEW HAMPSHIRE/GRIFFIN	1S11E9329CE525258	Strick	Q4320E99NFW	2012	03/17/11	Single axle 32 foot van trailer
SHAW	1S11E9281FE530710	Strick	S4280E99NFWO	2015	05/21/14	Single axle 28 foot van trailer
SHAW	1S11E9283FE530711	Strick	S4280E99NFWO	2015	05/29/14	Single axle 28 foot van trailer
SHAW	1S11E9322FE530712	Strick	S4320E99NFWO	2015	06/05/14	Single axle 32 foot van trailer
SHAW	1S11E9324FE530713	Strick	S4320E99NFWO	2015	05/27/14	Single axle 32 foot van trailer
SHAW	1S11E9326FE530714	Strick	S4320E99NFWO	2015	06/02/14	Single axle 32 foot van trailer
TRI STATE LCSTR/WOOLRICH	1S11E9429BE524639	Strick	S4420E99NFWO	2011	06/14/10	Single axle 42 foot van trailer
VIRGINIA TRLR/TIDEWATER	1S11E9353DE527261	Strick	S4350E99NFW	2013	09/10/12	Single axle 35 foot van trailer
VIRGINIA TRLR/TIDEWATER	1S11E9355DE527262	Strick	S4350E99NFW	2013	09/11/12	Single axle 35 foot van trailer

GSA AUTOMOTIVE COMMODITY CENTER	1S11E9307DE526893	Strick	G4300E99NFWO	2013	05/03/12	Single axle 30 foot van trailer
GSA AUTOMOTIVE COMMODITY CENTER	1S11E9309DE526894	Strick	G4300E99NFW	2013	04/30/12	Single axle 30 foot van trailer
GSA AUTOMOTIVE COMMODITY CENTER	1S12E9481DE526896	Strick	G4300E99NFW	2013	04/23/12	Single axle 30 foot van trailer