



**STRICK TRAILERS, LLC**

225 Lincoln Highway

Fairless Hills

Pennsylvania, USA

19030.0009

215.949.3600

August 7, 2015



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  
[RMD.ODI@dot.gov](mailto:RMD.ODI@dot.gov)

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 (NHTSA) 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](mailto:ssolomon@diamatrix.net)  
P: (215) 949-4768  
F: (215) 949-4769



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2. **Identification of the recall population:** The recall population includes all Strick 28 ft. dry freight van trailers with single axle fixed suspension built for a single customer, Estes Express Lines ("Estes"), from October 2012 through July 2013. The attached spreadsheet sets forth the make, model, model years, vehicle identification numbers and manufacturing dates of the recalled vehicles.
3. **The total number of vehicles in the recall population:** 1000, 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 trailers were intended to be built as "wheels back" trailers with the axle set at 32 inches from the rear. The tires ultimately furnished by the customer had a diameter such that the rear face of the tires were approximately 12.16 inches to 12.46 inches forward of the rear of the trailer at the time of manufacture, instead of the 12 inch maximum specified by Federal Motor Vehicle Safety Standard 224. Strick Trailers has no basis on which to determine whether the small increase in distance between the rear face of the tires and the rear of the trailer has an impact on motor vehicle safety. However, since the discrepancy constitutes a technical noncompliance with Federal Motor Vehicle Safety Standard 224, Strick Trailers is reporting it to NHTSA.
6. **Chronology of events:**
  - (a) On or about December 17, 2014, Strick Trailers determined that there was a potential design discrepancy in tire diameter relative to the axle location on a group of Estes dry freight van trailers, whereas, the tires ultimately furnished by the customer had a slightly different diameter than the tires used by Strick Trailers in its design calculations and, as a result, the trailers may not qualify as "wheels back."
  - (b) Between December 18, 2014, and December 31, 2014, Strick Trailers analyzed the design and determined that a sampling of approximately 100 trailers would be reviewed to check actual measurements.
  - (c) Between January 5, 2015, and January 15, 2015, Strick Trailers contacted various Estes locations for the purpose of visiting those locations to inspect trailers.
  - (d) Between January 20, 2015, and August 3, 2015, Strick Trailers inspected trailers and gathered data in order to confirm the existence of a discrepancy and to determine a course of action.
7. **Remedy plan:** Currently the trailers have one adjustable torque arm and one fixed torque arm on the suspension. Strick Trailers intends to supply and pay for the installation of an adjustable torque arm to replace the fixed torque arm on the suspension. With two adjustable torque arms, the axle can be adjusted rearward a short distance to bring the trailer into compliance as a "wheels back" trailer, and



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then realigned. 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 Estes within 5 days of NHTSA's approval of the proposed customer notification letter.

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 blue ink, appearing to read "Shari M. Solomon", with a stylized flourish at the end.

Shari M. Solomon  
General Counsel

SMS:dd  
Enc.

<u>Customer</u>	<u>VIN</u>	<u>Make</u>	<u>Model</u>	<u>Model Year</u>	<u>Date of Manufacture</u>	<u>Model Description</u>
Estes Express Lines	1S11e9283DE527269	Strick	S4280E99NFWOP	2013	07/15/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e928XDE527270	Strick	S4280E99NFWOP	2013	07/15/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9281DE527271	Strick	S4280E99NFWOP	2013	10/29/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9283DE527272	Strick	S4280E99NFWOP	2013	10/29/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9285DE527273	Strick	S4280E99NFWOP	2013	10/25/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9287DE527274	Strick	S4280E99NFWOP	2013	10/25/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9289DE527275	Strick	S4280E99NFWOP	2013	10/24/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9280DE527276	Strick	S4280E99NFWOP	2013	10/24/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9282DE527277	Strick	S4280E99NFWOP	2013	10/23/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9284DE527278	Strick	S4280E99NFWOP	2013	10/23/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9286DE527279	Strick	S4280E99NFWOP	2013	10/16/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9282DE527280	Strick	S4280E99NFWOP	2013	10/16/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9284DE527281	Strick	S4280E99NFWOP	2013	10/22/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9286DE527282	Strick	S4280E99NFWOP	2013	10/22/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9288DE527283	Strick	S4280E99NFWOP	2013	10/12/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e928XDE527284	Strick	S4280E99NFWOP	2013	10/02/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9281DE527285	Strick	S4280E99NFWOP	2013	10/12/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9283DE527286	Strick	S4280E99NFWOP	2013	10/11/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9285DE527287	Strick	S4280E99NFWOP	2013	10/11/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9287DE527288	Strick	S4280E99NFWOP	2013	10/10/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9289DE527289	Strick	S4280E99NFWOP	2013	10/09/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9285DE527290	Strick	S4280E99NFWOP	2013	10/09/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9287DE527291	Strick	S4280E99NFWOP	2013	10/08/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9289DE527292	Strick	S4280E99NFWOP	2013	10/08/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9280DE527293	Strick	S4280E99NFWOP	2013	10/08/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9282DE527294	Strick	S4280E99NFWOP	2013	10/08/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9284DE527295	Strick	S4280E99NFWOP	2013	10/18/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9286DE527296	Strick	S4280E99NFWOP	2013	10/18/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9288DE527297	Strick	S4280E99NFWOP	2013	10/18/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e928XDE527298	Strick	S4280E99NFWOP	2013	10/18/12	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9281DE527299	Strick	S4280E99NFWOP	2013	10/01/12	Single axle 28 foot van trailer w/pintle hook

























































Estes Express Lines	1S11e9282DE528252	Strick	S4280E99NFWOP	2013	06/17/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9284DE528253	Strick	S4280E99NFWOP	2013	06/17/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9286DE528254	Strick	S4280E99NFWOP	2013	06/17/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9288DE528255	Strick	S4280E99NFWOP	2013	06/17/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e928XDE528256	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9281DE528257	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9283DE528258	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9285DE528259	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9281DE528260	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9283DE528261	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9285DE528262	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9287DE528263	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9289DE528264	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9280DE528265	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9282DE528266	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9284DE528267	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook
Estes Express Lines	1S11e9286DE528268	Strick	S4280E99NFWOP	2013	06/19/13	Single axle 28 foot van trailer w/pintle hook