



STRICK TRAILERS, LLC

225 Lincoln Highway

Fairless Hills

Pennsylvania, USA

19030.0009

215.949.3600

VIA RECALL PORTAL

September 22, 2015



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

Re: NHTSA Campaign No. 15V-506 - Supplemental Safety Defect Report

Dear Administrator:

This letter is a supplement to the Strick Trailers, LLC ("Strick Trailers") noncompliance report dated August 7, 2015 for Campaign No. 15V-506, a copy of which is attached. Pursuant to Title 49 of the Code of Federal Regulations, Part 573, Sec. 6, please be advised as follows:

1. Supplemental chronology of events:

(a) On August 11, 2015, Strick Trailers determined that the rear impact guard on the trailers would be tested.

(b) On August 13, 2015, Strick Trailers determined that the rear impact guard gussets would be replaced to make the rear impact guard compliant with Federal Motor Vehicle Safety Standard 223, rather than adjusting the axle location to make the trailers compliant with the "wheels back" configuration as originally intended.

(c) Between August 13, 2015, and September 17, 2015, Strick Trailers identified six additional trailers that should be added to the noncompliance report. The trailers are:

1S11E9337FE531198
1S11E9339FE531199
1S11E9331FE531200
1S11E9333FE531201
1S11E9335FE531202
1S11E9337FE531203

(d) Between August 12, 2015, and September 17, 2015, Strick Trailers designed and tested the remedy for compliance.



Associate Administrator for Enforcement
September 22, 2015
Page 2

2. Identification of the recall population (revised): The recall population includes all Strick 28 ft. and 33 ft. dry freight van trailers built for a single customer, Estes Express Lines, from October 2012 through June 2014 that are equipped with rear impact guard gussets 41745/41746. The attached revised spreadsheet sets forth the make, model, model years, vehicle identification numbers and manufacturing dates of the recalled vehicles.

3. Remedy plan (revised): To remedy the noncompliance, Strick Trailers intends to supply and pay for the replacement of the curbside and roadside rear impact guard gussets. Strick Trailers will manufacture and supply the replacement gussets without cost to Estes Express Lines. The replacement gussets are expected to be available for delivery beginning on November 25, 2015. Strick Trailers will reimburse Estes Express Lines for the reasonable direct labor costs required to effect the repair. The work to replace the rear impact guard gussets will take approximately two hours to perform. The remedy plan is set forth in greater detail in the proposed customer notification letter enclosed herewith for your approval. Notification will occur within 5 days of NHTSA's approval of the proposed customer notification letter.

Please contact me at 215-949-4768 if you have any questions or comments. We will send out the customer notification letters as soon as the proposed form is approved.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Shari M. Solomon".

Shari M. Solomon
General Counsel

SMS:dd
Enc.



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

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
P: (215) 949-4768
F: (215) 949-4769



Associate Administrator for Enforcement
August 7, 2015
Page 2

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



Associate Administrator for Enforcement
August 7, 2015
Page 3

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".

Shari M. Solomon
General Counsel

SMS:dd
Enc.



STRICK TRAILERS, LLC

225 Lincoln Highway
Fairless Hills
Pennsylvania, USA
19030.0009
215.949.3600



IMPORTANT SAFETY RECALL

**This notice applies to your vehicles
identified on the enclosed spreadsheet**

September 29, 2015

CERTIFIED MAIL – R.R.R.

Estes Express Lines
Attn: Mike Palmer
3901 West Broad Street
Richmond, VA 23230-3962

Dear Mr. Palmer,

This notice is sent in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Strick Trailers, LLC ("Strick Trailers") has determined that a noncompliance which relates to motor vehicle safety exists in your trailers identified on the enclosed spreadsheet.

The noncompliance is in regards to the location of the axle on your 28 ft. and 33 ft. dry freight van trailers. The axle is positioned such that the trailers do not uniformly meet the "wheels back" criteria of Federal Motor Vehicle Safety Standard ("FMVSS") 224 as they were originally intended. This could increase the risk of injury in the event of a rear impact crash.

In order to remedy the noncompliance, Strick Trailers will provide rear impact protection in accordance with the requirements of FMVSS 224 by reinforcing the rear impact guards by replacing the curbside and roadside rear impact guard gussets in accordance with the instructions (Drawing 705290) attached to this letter. We will supply the new replacement parts without cost and will ship them to multiple locations at your request. The parts necessary to replace the gussets are expected to be available for delivery beginning on November 25, 2015. We will also reimburse you for the reasonable direct labor costs involved in effecting the repair or will have the repair facilities bill us directly. The work to replace the rear impact guard gussets will take approximately two hours to perform.

We will make ourselves available to answer any questions that arise during the course of this modification program, and, if requested, assist you in locating qualified repair facilities. We will also provide training or any other support you need. If you need any assistance, please contact me, Jerry Clontz, at jclontz@diamatrix.net or 1-704-436-2590.



Estes Express Lines
September 29, 2015
Page 2

Invoices for completed work should be submitted with authorization number M2014036 and a list of vehicle identification numbers for the serviced equipment to:

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

If you have had your vehicle repaired prior to receipt of this notice, you may be entitled to reimbursement if you incurred any out-of-pocket cost due to this matter. For further information, please contact us at 1-704-436-2590.

Federal law requires any lessor who receives a notification of a determination of a safety-related defect or noncompliance pertaining to any leased motor vehicle to send the notice to the lessee within 10 days.

We regret any inconvenience this action may cause you. However, we are concerned about your safety, and we have notified the National Highway Traffic Safety Administration of this program. If you are unable to have these defects remedied without charge, you may submit a complaint to:

Administrator, U.S. Department of Transportation
National Highway Traffic Safety Administration
Office of Defects Investigation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Alternatively, you may call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153) or go to <http://www.safercar.gov>.

Thank you for your attention to this important matter.

Very truly yours,

Jerry Clontz

STEPS:

1. UNBOLT THE REAR IMPACT GUARD TUBE AND DISCARD THE BOLTS, NUTS AND WASHERS.
2. INSPECT THE TUBE FOR STRAIGHTNESS AND EXCESSIVE CORROSION. IF THE TUBE HAS A 1" OR GREATER BEND OR HAS EXCESSIVE CORROSION NEAR THE BOLTED CONNECTION DISCARD AND REPLACE IT. IF A NEW RIG TUBE IS NEEDED CONTACT STRICK TRAILERS LLC ENGINEERING DEPARTMENT AT 260-692-6121.
3. UNBOLT THE EXISTING GUSSETS FROM THE REAR SILL AND SUSPENSION I-BEAM TAB AND DISCARD THE GUSSETS.
4. REMOVE THE TABS WELDED TO THE SUSPENSION I-BEAM SHOWN IN DETAIL A ON SHEET 2. DO NOT CUT INTO ANY SURFACE OF THE I-BEAM. GRIND THE REMAINING SURFACE FLAT.
5. ATTACH THE PROVIDED DRILL TEMPLATE USING THE OLD GUSSET'S BOLTS AND NUTS IN THE EXISTING 5/8" HOLES IN THE REAR SILL BASEPLATE. TIGHTEN THE BOLTS ENOUGH TO KEEP THE TEMPLATE FROM MOVING.
6. MARK AND DRILL 33/64" DIAMETER HOLES IN THE REAR SILL BASEPLATE FOR 1/2" BOLTS.
7. REPEAT STEPS 5 AND 6 FOR THE OPPOSITE SIDE. ONCE BOTH SIDES ARE DRILLED DISCARD THE TEMPLATE.
8. ASSEMBLE THE BUMPER TUBE AND NEW GUSSETS USING THE PROVIDED HARDWARE, BUT DO NOT FULLY TORQUE BOLTS. REFERENCE SHEET 3 FOR ASSEMBLY. DO NOT REUSE ANY OLD BOLTS, NUTS OR WASHERS.
9. BOLT THE NEW GUSSETS TO THE REAR SILL USING THE OLD GUSSET'S BOLTS AND NUTS. TIGHTEN THEM ENOUGH TO HOLD THE GUSSETS FROM MOVING. BE SURE TO VERIFY THAT 3 HOLES ARE ON THE OUTSIDE AND 2 HOLES ARE ON THE INSIDE OF THE I-BEAM FLANGE, REFER TO DETAIL B ON SHEET 2.
10. MARK THE HOLE LOCATIONS ON THE SUSPENSION I-BEAM USING THE PLATE ON THE GUSSET.
11. ONCE BOTH SIDES ARE MARKED REMOVE THE GUSSETS AND DISCARD THE USED BOLTS AND NUTS.
12. DRILL 33/64" DIAMETER HOLES IN THE I-BEAM FLANGE FOR 1/2" BOLTS.
13. CLEAN SURFACES AND APPLY UNDERCOAT, PRIMER, PAINT OR EQUIVALENT TO PREVENT CORROSION. BE SURE TO APPLY TO ALL DRILLED HOLES.
14. AFTER THE APPROPRIATE DRY TIME, PLACE THE NEW GUSSET ON THE TRAILER AND ATTACH USING THE SPECIFIED BOLTS SHOWN ON SHEET 3. DO NOT REUSE ANY OLD BOLTS, NUTS OR WASHERS.
15. TIGHTEN ALL BOLTS TO THE TORQUE VALUES GIVEN BELOW.
16. ANY QUESTIONS REGARDING THE INSTALLATION OF THE REAR IMPACT GUARD RETROFIT SHOULD BE DIRECTED TO STRICK TRAILERS LLC ENGINEERING AT 260-692-6121.

FASTENERS MUST BE TORQUED TO THE FOLLOWING VALUES:

- 1/2" GRADE 5 BOLTS WITH CLEAN DRY THREADS: 75FT-LBS TORQUE
- 5/8" GRADE 8 BOLTS WITH CLEAN DRY THREADS: 190-210 FT-LBS TORQUE

REVISIONS

REV.	REMARKS	DATE	DRN
A	UPDATED DRAWING WITH CHANGES REQUESTED	09/21/15	JMK

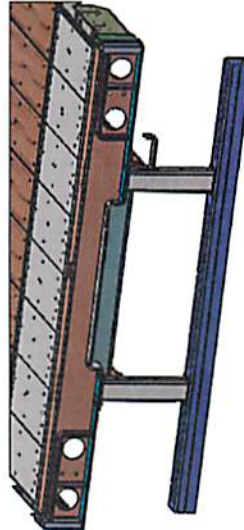
STRICK TRAILERS, LLC #705290 / REAR IMPACT GUARD FIELD RETROFIT INSTRUCTIONS:

NOTE: THE FOLLOWING INSTRUCTIONS AND DIAGRAMS HAVE BEEN PROVIDED FOR THE PURPOSE OF UPDATING THE EXISTING STRICK O.E.M. REAR IMPACT GUARD. THE PERSON(S) PERFORMING THE WORK SHOULD ADHERE STRICTLY TO THE INSTRUCTIONS SET FORTH HEREIN AND BE FAMILIAR WITH THE REQUIREMENTS OF ALL APPLICABLE REGULATIONS, INCLUDING BUT NOT LIMITED TO FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION REGULATIONS PART 393.86 (REAR IMPACT GUARDS AND REAR IMPACT PROTECTION) AND/OR CANADA MOTOR VEHICLE SAFETY STANDARD 223 (REAR IMPACT GUARD).

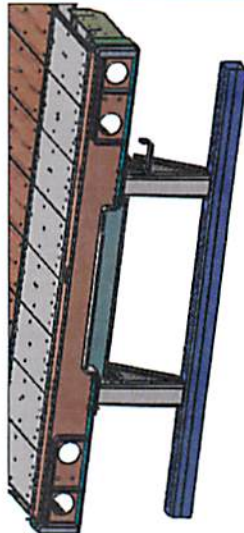
SAFETY PRECAUTIONS:

STRICK REAR IMPACT GUARD (RIG) ASSEMBLIES OR COMPONENTS MUST NOT BE INSTALLED ON OTHER MANUFACTURERS' TRAILERS. BEFORE BEGINNING THE WORK, MAKE CERTAIN THE TRAILER IS CHOCKED TO PREVENT MOVEMENT. USE A CONSPICUOUS SIGN, BARRIER OR OTHER METHOD TO PREVENT A TRACTOR FROM BACKING UNDER THE TRAILER DURING THE REPAIR PROCESS. PROPER PROTECTIVE EQUIPMENT SHOULD BE WORN AT ALL TIMES DURING REAR IMPACT GUARD UPGRADE.

CURRENT DESIGN



NEW DESIGN



DATE	DATE	DATE	DATE
705290/	JMK	09/17/2015	09/21/15
	CHECKED	CHECKED	CHECKED
	ASSEMBLY'S	ASSEMBLY'S	ASSEMBLY'S
	ANGULAR ± 0.1°	ANGULAR ± 0.1°	ANGULAR ± 0.1°

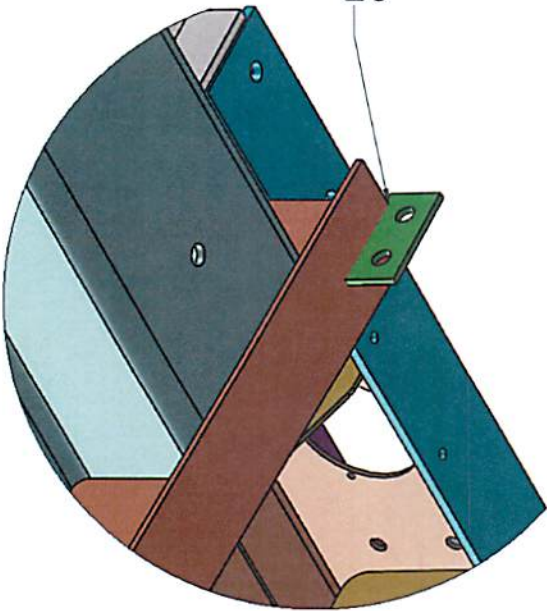
THIS DRAWING IS LOANED FOR PURPOSE OF ENGINEERING STUDY. THE DRAWING IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF STRICK TRAILERS, LLC. IT IS NOT TO BE REPRODUCED, COPIED, USED, DISCLOSED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF STRICK TRAILERS, LLC. THIS DRAWING IS LOANED FOR PURPOSE OF ENGINEERING STUDY. EQUIPMENT MATERIALS OR PARTS THEREOF EXCEPT IN THIS DRAWING SHALL BE THE PROPERTY OF STRICK TRAILERS, LLC. THIS DRAWING IS LOANED FOR PURPOSE OF ENGINEERING STUDY. EQUIPMENT MATERIALS OR PARTS THEREOF EXCEPT IN THIS DRAWING SHALL BE THE PROPERTY OF STRICK TRAILERS, LLC.

MATERIAL: X
STRICK
STRICK TRAILERS, LLC MONROE, IN 46772 SW
FIELD, INST, RIG, UPG, ESTES, 41745/46 FIX, PH

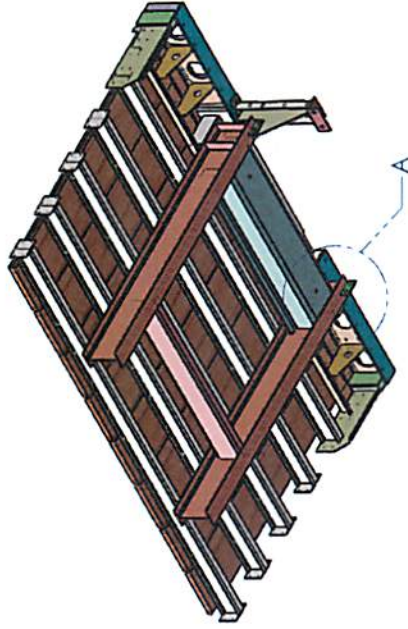
705290/

Sheet 1 of 3

705290/



REMOVE TAB AND
GRIND SMOOTH



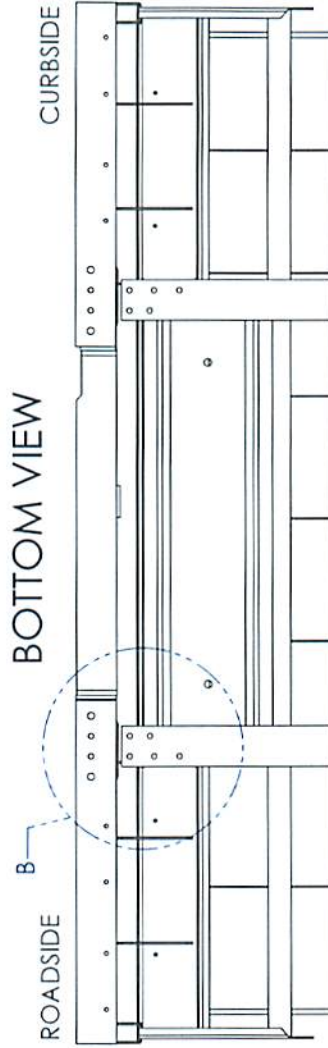
DETAIL A
SCALE 1 : 4

DETAIL B
SCALE 1 : 6

USE TO LOCATE
DRILL TEMPLATE

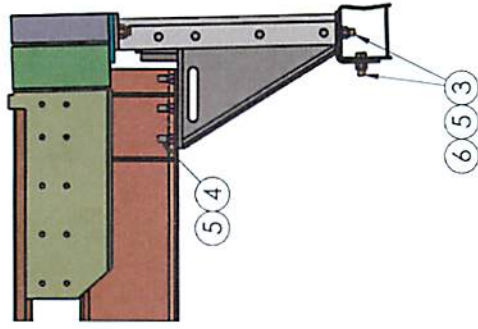
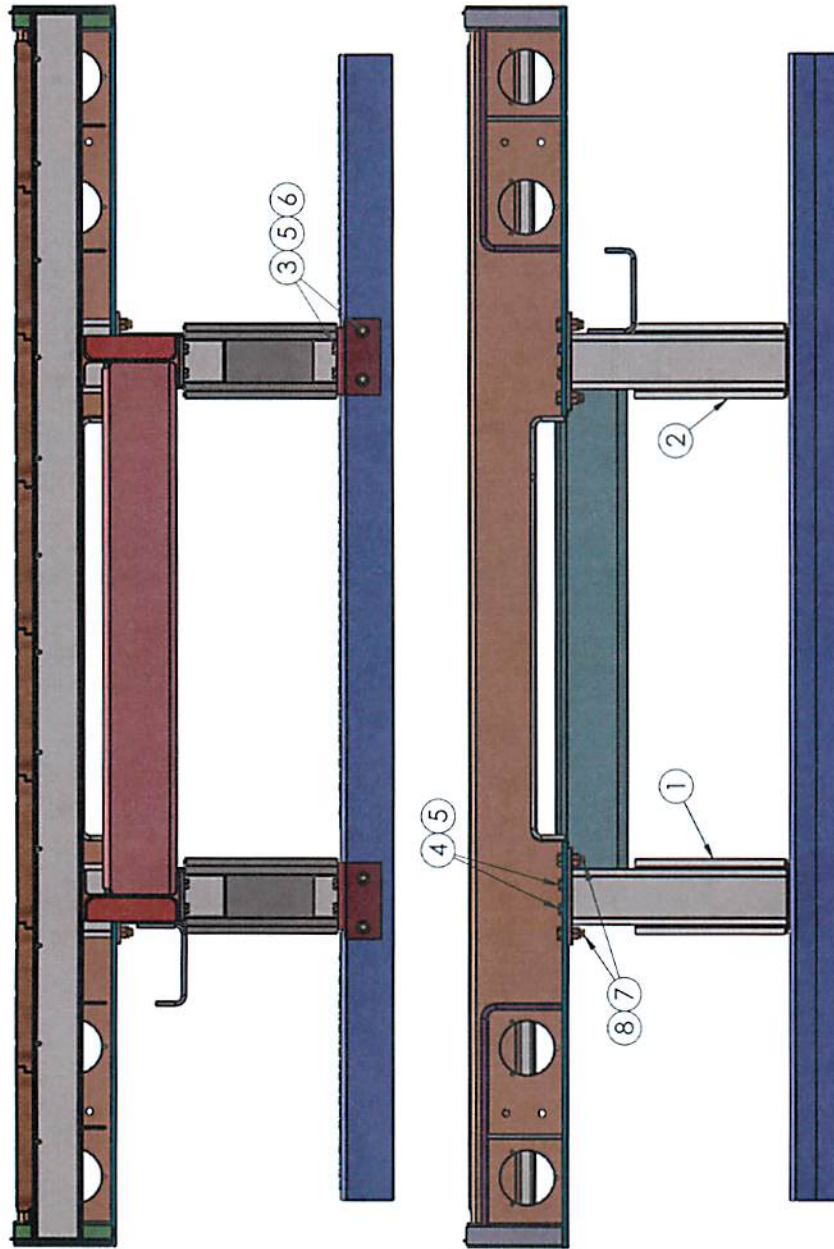
NOTE: 3 HOLES TO OUTSIDE
2 HOLES TO INSIDE

ϕ .516 (33/64 DRILL BIT)



BOTTOM VIEW

MATERIAL: X STRICK TRAILERS, LLC MONROE, IN 46772 SW	
DRAWN: JMK CHECKED:	DATE: 09/17/2015 DATE:
THIS DRAWING IS LOANED FOR PURPOSE OF ENGINEERING STUDY ONLY WITH THE UNDERSTANDING THAT IT SHALL BE HELD IN CONFIDENCE AND FOR THE PURPOSES OF STRICK TRAILERS, LLC. IT IS NOT TO BE REPRODUCED, COPIED, USED, DISCLOSED OR DISTRIBUTED IN ANY MANNER WITHOUT THE EXPRESS WRITTEN CONSENT OF STRICK TRAILERS, LLC.	
FIELD, INST, RIG, UPG, ESTES, 41745/46 FIX, PH	
705290 /	
Sheet 2 of 3	



ITEM NO.	QTY.	PART NUMBER	Description
1	1	705282	BMPR,GUS,ASM,PUP,32AXLE,PH,RS,CMVSS FIX
2	1	705283	BMPR,GUS,ASM,PUP,32AXLE,PH,RS,CMVSS FIX
3	8	45641	BOLT, HH, 1/2-13NC X 1.5IN, GR5
4	14	62002	BOLT, HH, 1/2-13NC X 2IN, GR5
5	22	00287	NUT, LOCK, 1/2-13, ESLOK, GR5, ZN, NYLON
6	8	00300	WSHR,FLAT,.531ID,1.062OD,13GA,GR5,ZN
7	4	62224	BOLT, HHC, 5/8-11NC X 1.75IN, GR 8
8	4	45723	NUT,LOCK,5/8-11NC,ESLOK,GR8,ZN,NYLON
9	1	705306	DRILL TEMPLATE,BMPR,GUS,SILL,ESTES,PLST

MATERIAL: X		DATE		DATE	
STRICK		JMK	09/17/2015		
STRICK TRAILERS, LLC MONROE, IN 46772		DESIGNED		CHECKED	
FIELD,INST,RIG,UPG,ESTES,41745/46 FIX,PH		ASSEMBLY		ANGULAR	
705290		THIS DRAWING IS LOANED FOR PURPOSE OF ENGINEERING STUDY ONLY. IT IS NOT TO BE REPRODUCED, COPIED, USED, DISCLOSED OR TRANSMITTED IN ANY MANNER WITHOUT THE EXPRESS WRITTEN CONSENT OF STRICK TRAILERS, LLC.			
705290		Sheet 3 of 3			

Estes Express Lines	1S11E9337FE531203	Strick	S4330E99NFOPWW	2015	06/23/14	Single axle 33 foot van trailer with pintle hook
---------------------	-------------------	--------	----------------	------	----------	--