



STRICK TRAILERS, LLC

225 Lincoln Highway

Fairless Hills

Pennsylvania, USA

19030.0009

215.949.3600

August 27, 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 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
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2. Identification of the recall population: The recall population includes certain Strick single axle fixed suspension dry freight van trailers that are equipped with a Strick rear impact guard that uses gusset part numbers 46993 and 46994. Trailers equipped with these rear impact guard gussets were manufactured between October 2000 and April 2008. 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 46993 and 46994 where the trailers did not qualify as "wheels back."
3. The total number of vehicles in the recall population: 33, 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 46993 and 46994 do not meet the standards set forth in Federal Motor Vehicle Safety Standard (FMVSS) 223. This could increase the risk of injury in the event of a rear impact crash.
6. Chronology of events:
 - (a) On October 2, 2014, Strick Trailers determined that the design of a rear impact guard using gussets 46993 and 46994 may not have been verified using prescribed test procedures.
 - (b) Between October 2, 2014 and approximately June 24, 2015, Strick determined that the majority of trailers built using rear impact guard gussets 46993 and 46994 qualified as "wheels back" and thus did not require a rear impact guard pursuant to FMVSS 224. A small number, however, did not qualify as "wheels back" and were determined to require a rear impact guard in conformance with FMVSS 223.
 - (c) Between June 30, 2015, and August 19, 2015, Strick Trailers prepared bills of materials, fabricated and assembled parts for the test specimen.
 - (d) On August 20, 2015, Strick Trailers tested a rear impact guard assembly containing gussets 46993 and 46994. 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.
 - (e) On August 20, 2015, Strick Trailers determined that one of the 33 trailers might require a different remedy due to a slightly different attachment method of the rear impact guard to the trailer.
 - (f) On August 24, 2015, Strick Trailers began the process of identifying and testing an appropriate remedy or remedies. Remedy alternatives under consideration include reinforcement of the existing rear impact guard or replacement of the rear impact guard gussets.



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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 currently underway. 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.

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.

Midwest Motor Express	1S11E92849E523254	Strick	S4285E99NFWP	2009	03/17/08	Single axle 28.5 foot van trailer with pintle hook
Midwest Motor Express	1S11E92869E523255	Strick	S4285E99NFWP	2009	03/17/08	Single axle 28.5 foot van trailer with pintle hook
Midwest Motor Express	1S11E92899E523256	Strick	S4285E99NFWP	2009	03/17/08	Single axle 28.5 foot van trailer with pintle hook