



**STRICK TRAILERS, LLC**

225 Lincoln Highway  
Fairless Hills  
Pennsylvania, USA  
19030.0009  
215.949.3600



December 7, 2015

VIA EMAIL AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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



Associate Administrator for Enforcement  
December 7, 2015  
Page 2

numbers 59653 and 59654. Trailers equipped with these rear impact guard gussets were manufactured between April 2006 and February 2015. 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 59653 and 59654.

3. **The total number of vehicles in the recall population:** 188, 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 59653 and 59654 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 March 18, 2014, Strick Trailers determined that the design of a rear impact guard using gussets 59653 and 59654 may not have been verified using prescribed test procedures.
  - (b) On June 26, 2014, Strick Trailers tested a rear impact guard assembly containing gussets 59653 and 59654. 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.
  - (c) Between June 26, 2014 and July 7, 2014, Strick Trailers confirmed a population of 67 vehicles whose rear impact guard incorporated gussets 59653 and 59654.
  - (d) On July 8, 2014, Strick Trailers began the process of identifying and testing an appropriate remedy. Remedy alternatives under consideration included reinforcement of the existing rear impact guard or replacement of the rear impact guard gussets.
  - (e) On July 9, 2014, Strick Trailers filed a recall notice with NHTSA for 67 vehicles whose rear impact guard incorporated gussets 59653 and 59654. The recall was assigned campaign number 14V-416.
  - (f) On August 25, 2014, Strick Trailers filed a supplementary recall notice with NHTSA containing the remedy plan and sample customer notification letter. The remedy consisted of installation of reinforcements to the curbside and roadside rear impact guard gussets on each unit. Notification to customers began on September 23, 2014 and was completed on October 17, 2014.



Associate Administrator for Enforcement  
December 7, 2015  
Page 3

(g) On November 24, 2015, Strick Trailers identified certain additional trailers equipped with a rear impact guard using gusset part numbers 59653 and 59654 that were not included in Campaign 14V-416.

(h) Between November 24, 2015 and November 30, 2015, Strick Trailers confirmed a population of 188 additional trailers for recall.

(i) On November 30, 2015, Strick Trailers contacted NHTSA to determine how to report the additional 188 trailers.

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 black ink, appearing to read "Shari M. Solomon".

Shari M. Solomon  
General Counsel

SMS:dd  
Enc.