



STRICK TRAILERS, LLC

225 Lincoln Highway

Fairless Hills

Pennsylvania, USA

19030.0009

215.949.3600

April 12, 2016



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
Fairless Hills, PA 19030
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 certain Strick single axle fixed suspension dry freight van trailers that are equipped with a Strick rear impact guard that uses gusset part numbers 52236 and 52237. Trailers equipped with these rear impact guard gussets were manufactured for a single customer, Estes Express Lines ("Estes") between August 2003 and October 2003. 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 52236 and 52237.
3. **The total number of vehicles in the recall population:** 460, 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 52236 and 52237 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) In March 2014, Strick Trailers determined that the design of a rear impact guard using gussets 52236 and 52237 may not have been verified using prescribed test procedures.
 - (b) Between March 2014 and approximately March 15, 2016, Strick reviewed the designs containing gussets 52236 and 52237 and determined they did not qualify as "wheels back" and thus required a rear impact guard pursuant to FMVSS 224 and FMVSS 223.
 - (c) Between March 15, 2016, and April 5, 2016, Strick Trailers prepared bills of materials, fabricated and assembled parts for the test specimen.
 - (d) On April 5, 2016, Strick Trailers tested a rear impact guard assembly containing gussets 52236 and 52237. 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.
7. **Remedy plan:** Strick Trailers intends to supply and pay for the installation of reinforcements to the rear impact guard. 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.



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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.

<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>
Estes	1S11E92894E498991	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92804E498992	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92824E498993	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92844E498994	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92864E498995	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92884E498996	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E928X4E498997	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92814E498998	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92834E498999	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92844E499000	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92864E499001	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92884E499002	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E928X4E499003	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92814E499004	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92834E499005	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92854E499006	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92874E499007	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92894E499008	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92804E499009	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92874E499010	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92894E499011	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92804E499012	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92824E499013	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92844E499014	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92864E499015	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92884E499016	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E928X4E499017	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92814E499018	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92834E499019	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E928X4E499020	Strick	S4280E99NFOWW	2004	08/18/03	Single axle 28 foot van trailer
Estes	1S11E92814E499021	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92834E499022	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer
Estes	1S11E92854E499023	Strick	S4280E99NFOWW	2004	08/01/03	Single axle 28 foot van trailer

Estes	1S11E92804E499432	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92824E499433	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92844E499434	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92864E499435	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92884E499436	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E928X4E499437	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92814E499438	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92834E499439	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E928X4E499440	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92814E499441	Strick	S4280E99NFOWW	2004	10/31/03	Single axle 28 foot van trailer
Estes	1S11E92834E499442	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92854E499443	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92874E499444	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92894E499445	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92804E499446	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92824E499447	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92844E499448	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92864E499449	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
Estes	1S11E92824E499450	Strick	S4280E99NFOWW	2004	10/03/03	Single axle 28 foot van trailer
460	Total Trailers					