



U.S. Department of Transportation  
**National Highway Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

November 27, 2019

Mr. Rick Conner  
President  
Conel, LLC dba McElrath Trailers  
3375 Chesnee Hwy  
Chesnee, SC 29323

NEF-150MR  
19V-793

**Subject:** Missing Reflex Reflectors/FMVSS 108

Dear Mr. Conner:

This letter serves to acknowledge Conel, LLC dba McElrath Trailers's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**

MCELRATH TRAILERS/VX/2014-2019

**Mfr's Report Date:** November 5, 2019

**NHTSA Campaign Number:** 19V-793

**Components:**

EXTERIOR LIGHTING

**Potential Number of Units Affected:** 1,261

**Problem Description:**

Conel, LLC dba McElrath Trailers (McElrath Trailers) is recalling certain 2014-2019 VX trailers. The side marker LED lights may be missing reflex reflectors. As such, these vehicles fail to comply with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) number 108, "Lamps, Reflective Devices, and Associated Equipment."

**Consequence:**

The lack of reflex reflectors can reduce the trailer's visibility to others, increasing the risk of a crash.

**Remedy:**

McElrath Trailers will notify owners, and dealers will install separate reflex reflectors on the sides and rear of the trailer, free of charge. The manufacturer has not yet provided a notification schedule. Owners may contact McElrath Trailers customer service at 1-864-814-2220.

**Notes:**

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to [www.safercar.gov](http://www.safercar.gov).

NHTSA is missing critical, required information for this safety recall. This information must be supplied through the NHTSA Recalls Portal within 5 working days of confirming its accuracy:

- The total number of products potentially containing the defect or noncompliance (49 CFR 573.6 (c)(3)).
- The percentage of products estimated to contain the defect or noncompliance (49 CFR 573.6 (c)(4)).
- A statement that the defect or noncompliance can cause a vehicle crash without prior warning (49 CFR 577.5 (f)(1)).
- Your company must supply the estimated date(s) for which it will notify owners regarding this safety recall. If your company subsequently becomes aware that either the beginning or the completion dates reported to the agency for any of the notifications will be delayed by more than two weeks, your company shall promptly advise the agency of the delay and the reasons therefore, and furnish a revised estimate (49 CFR 573.6 (c)(8)(ii)).
- Your company must supply the estimated date(s) for which it will notify dealers and/or distributors regarding this safety recall. If your company subsequently becomes aware that either the beginning or the completion dates reported to the agency for any of the notifications will be delayed by more than two weeks, your company shall promptly advise the agency of the delay and the reasons therefore, and furnish a revised estimate. (49 CFR 573.6 (c)(8)(ii)).

Please submit, through the recall portal, a spreadsheet of the affected trailers.

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

Please be reminded of the following requirements:

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Michelle Rice who may be reached by phone at (202) 366-1060, or by email at [michelle.rice@dot.gov](mailto:michelle.rice@dot.gov). We look forward to working with you.

Sincerely,



Joshua Neff  
Chief, Recall Management Division  
Office of Defects Investigations  
Enforcement