



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

1200 New Jersey Avenue SE  
Washington, DC 20590

August 13, 2021

Scott Sherman  
Black Tie Products  
2749 Jami St  
Elkhart, IN 46514

NEF-107MR  
21V-582

**Subject:** Incorrect Tire/Rim Size and GAWR Rating/FMVSS 110

Dear Scott Sherman:

This letter serves to acknowledge Black Tie Products'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:**

BLACK TIE/OPTIMUM RESTROOM TRAILER/2020-2021

**Mfr's Report Date:** July 29, 2021

**NHTSA Campaign Number:** 21V-582

**Components:**

EQUIPMENT:OTHER:LABELS  
TIRES

**Potential Number of Units Affected:** 10

**Problem Description:**

Black Tie Products (Black Tie) is recalling certain 2020-2021 ADA Drop OPTIMUM20 trailers. The certification label has the incorrect tire and wheel rim information, and an incorrect Gross Axle Weight Rating (GAWR). As such, these trailers fail to comply with the requirements of Federal Motor Vehicle Safety Standard numbers 110, "Tire Selection and Rims", and 567, "Certification."

**Consequence:**

Incorrect tire/rim and GAWR information may cause the trailer to be overloaded, increasing the risk of a crash.

**Remedy:**

A new certification label will be mailed to owners, free of charge. Owner notification letters are expected to be mailed in August 2021. Owners may contact Black Tie customer service at 1-574-277-3234.

**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.nhtsa.gov](http://www.nhtsa.gov).

**Please ensure the following requirements are met:**

An identification and description of the risk to motor vehicle safety reasonably related to the defect or noncompliance (49 CFR 573.6 (c)(5)). All filings should state an increased risk of either a crash, injury or fire.

**AMENDED 573 REQUIRED.**

It is our understanding that notification to owners began on July 30, 2021, prior to our review of the owner notification letter. Should it become necessary for Black Tie Products to do a renotification, the follow-up notification must be submitted to this office for review and it must comply with the requirements of Part 577.5, "Notification pursuant to a manufacturer's decision" and Part 577.10, "Follow-up notification."

We note that your report states that Black Tie Products believes that this matter does not have a safety risk. In our view, this statement has no force or effect in terms of Black Tie Product's obligation to undertake and complete the recall, and NHTSA does not agree with it.

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).

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.

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.

Black Tie Products's contact for this recall will be Michelle Rice who may be reached by email at [michelle.rice@dot.gov](mailto:michelle.rice@dot.gov). We look forward to working with you.

Sincerely,



Alex Ansley  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement