



2/26/2025

## NONCONFORMANCE INFORMATION REPORT

1. Vehicle Manufacturer Name:

U.S Vehicle Manufacturing and Sales

Orange EV “OEV”  
900 N. 69<sup>th</sup> Street, Kansas City, KS 66102

Affiliated Canadian Sales Company

Orange EV Canada  
3278 South Service Rd West, Unit 4  
Oakville, ON L6L 0B1, Canada

2. Identification of Involved Vehicles and Affected Components:

Based on production records, we have determined the involved vehicle population as follows:

Make/Model	Model Year	Production Period
HUSK-e XP	2023 – 2024	1/01/2023 – 12/31/2024

NOTE: (1) The recall population was determined based on a review of manufacturing records and includes all vehicles in the above listed make/model since start of production until production ended.

(2) Not all trucks manufactured were sold in the US.

3. Total Number of Vehicles Potentially Involved:

HUSK-e XP : 24  
Total : 24

4. Percentage of Vehicles Estimated to Actually Contain the Defect:

100% of all subject vehicles.

5. Description of Defect or Noncompliance:

The Orange EV HUSK-e XP is an electric truck that is primarily used at private shipping yards and terminals, but which may also operate on public roads. The subject vehicles have a tire and rim combination that do not meet the requirements of FMVSS 120. All 2023-2024 HUSK-e XPs have a posted rear Gross Axle Weight Rating



(GAWR) of 72,100 lbs. and are equipped with Continental Terminal Transport 300/80 R22.5 TL tires rated to a max speed of 25mph and a max load of 13,889 lbs. at 145PSI mounted on rims rated to a maximum of 11,025 lbs. The tires are intended for industrial use and were not certified to meet the requirements of FMVSS 120. Because the rims have a maximum load rating of 11,025 lbs., the actual rear GAWR is less than what is posted on the vehicle's certification label.

Affected FMVSS: FMVSS 120

Description of Safety Risk: Operating a vehicle with a tire and rim combination that is not adequate for the vehicle could increase the risk of overloading one or more tires resulting in a crash. In an extreme case of overloading where the tire(s) fail, this could increase the risk of injury to persons outside the vehicle.

Warning to Driver: None.

## 6. Chronology of Events:

### February 2025

Orange EV Manufacturing Quality was informed of a possible issue where the GVWR values of certain HUSK-e XPs were stamped incorrectly on the trucks' vehicle certification labels.

### February 12, 2025

Manufacturing Quality initiated an investigation, including a list of potentially affected vehicles for further investigation.

### February 13 - 14, 2025

During the investigation, while verifying the stamped tire size on the truck tires to the tire size on the certification label, it was observed that the Continental Terminal Transport 300/80 R22.5 TL tires on the truck were missing the symbol "DOT", along with other required markings per FMVSS 120. Additionally, the supplied rims were noted as having a maximum load capacity of 11,025lbs.

A review of the supplier provided specifications of the tires with the Engineering team indicated that the Continental Terminal Transport 300/80 R22.5 TL tires, OEV part number 30-001-00033, are industrial use tires not intended for "Highway Service".

A review of the supplier provided specifications of the rims with the Engineering team indicated that while the Maxion rims, OEV part number, 30-001-00034, are DOT compliant, the maximum load capacity rating of 11,025lbs. is not sufficient to safely handle a load of 13,889lbs.

### February 17, 2025

Based on the results of the investigation above, OEV determined that all affected HUSK-e XPs manufactured with the above-described tires and rims do not conform with the requirements of FMVSS 120.

Orange EV halted delivery of HUSK-e XPs until a remedy could be determined.



At this time, Orange EV is not aware of any crashes, injuries or fatalities related to this condition and has not received any warranty claims, reports or complaints about this issue.

7. Description of Corrective Repair Action:

Orange EV is currently developing the remedy. It is anticipated that all known owners of the subject vehicles will receive an interim notification which instructs them on precautions to take until the remedy can be performed. Owners will be contacted again when the remedy is available. Orange EV will notify the agency when the remedy is available as required by 49 CFR Part 573.

8. Recall Schedule

Notifications to owners of the affected vehicles will occur by April 25, 2025. A copy of the draft owner notification will be submitted as soon as it is available.

9. Distributor Notification Schedule:

There will be no Dealer/Distributor Notifications as Orange EV is the sole Dealer/Distributor of Orange EV trucks.

10. Manufacturer's Campaign Number:

[Interim / Remedy]: 2025-SRC-01I / 2025-SRC-01