



HLT Limited
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March 28, 2016

Via Email to TSB@DOT.GOV

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Early Warning Division (NVS-217)
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Response to NHTSA's Request for Information

Dear Sir/Madam:

HLT Limited ("HLT") received a letter from the National Highway Traffic Safety Administration ("NHTSA") dated February 22, 2016 requesting information from HLT regarding HLT's compliance with its reporting obligations under 49 C.F.R. § 579.5. The Letter specifically demands that HLT provide a complete response to each of the four requests outlined in the Letter. The following reflects HLT's response to each request.

1. *Are you currently or, at any time since November 1, 2012, have you been a "manufacturer" as defined by 49 C.F.R. § 579.4(c).*

Response: Yes, HLT is currently a manufacturer as that term is defined by 49 C.F.R. § 579.4(c) and has been a manufacturer since November 1, 2012.

2. *Provide an index to each document you were required to submit to the Agency pursuant to 49 C.F.R. § 579.5 at any time between November 1, 2012 and the date of your response.*

Response: HLT has not sent any notices, bulletins, or other external communications to more than one manufacturer, distributor, dealer, lessor, lessee, owner, or purchaser since November 1, 2012 that would fall within the scope of 49 C.F.R. § 579.5. Accordingly, HLT has not created or provided an index with this submission.

3. *For each document included in your index in response to Request No. 2, provide a copy (regardless of whether you previously submitted it to the Agency pursuant to 49 C.F.R. § 579.5).*

Response: As indicated in its response to Request No. 2, HLT did not issue any documents that would fall within the scope of 49 C.F.R. § 579.5. In an overabundance of caution, however, HLT has attached to this email a copy of each communication sent by HLT to more than one manufacturer, distributor, dealer, lessor, lessee, owner, or purchaser since November 1, 2012. HLT concluded that this communication was not covered by 49 C.F.R. § 579.5.

4. *For each of the three previous calendar years, state the aggregate number of each of the following (as defined by 49 C.F.R. § 579.4(c)) that you manufactured for sale, sold, offered for sale, introduced or delivered for introduction in interstate commerce, or imported into the United States:*

- a. Light vehicles;*
- b. Buses;*
- c. Emergency vehicles;*
- d. Medium-heavy vehicles (other than buses and emergency vehicles);*
- e. Motorcycles;*
- f. Trailers;*
- g. Child restraint systems; and*
- h. Tires.*

Response: HLT is a manufacturer of trailers as that term is defined by 49 C.F.R. § 579.4(c). Accordingly, in response to subsection (f) of Request No. 4, for the previous three calendar years, HLT has manufactured for sale, sold, offered for sale, introduced or delivered for introduction in interstate commerce, or imported into the United States the following number of trailers:

- a. Calendar Year Ending 12/31/2012: 8979
- b. Calendar Year Ending 12/31/2013: 9545
- c. Calendar Year Ending 12/31/2014: 9814

HLT has not manufactured for sale, sold, offered for sale, introduced or delivered any of the items specified in subsections (a)-(e), (g), or (h) of Request No. 4.

Please let us know if you have any questions or comments or require additional information.

Very truly yours,


Rod Harklau, Vice Pres/COO