

26 March, 2021

Mr. Jeremy Hamilton
Head of Recalls
Defect Investigations and Recalls Division
Motor Vehicles Safety
Transport Canada
80 Noel Street
Gatineau, QC J8Z 0A1

Via email: jeremy.hamilton@tc.gc.ca

Re: Notice of Noncompliance and Recall Campaign

Dear Mr. Hamilton;

Please accept this letter as our notification to Transport Canada that we are initiating a campaign to recall and correct a non-compliance found with the Rear Impact Guard (RIG) bumpers on 330 individual flat deck and step deck semi-trailers manufactured by Lode King Industries. Details are as follows:

- a. The name of the company giving notice is:
Triple E Canada Ltd.
D.B.A. Lode King Industries
Box 1146
135 Canada Street
Winkler, MB R6W 4B2
Phone (204) 325-4345
- b. We have not assigned our own internal recall campaign number. Instead, we will use your Transport Canada Recall designation as our identifier as soon as you assign one for this campaign.
- c. All of the affected trailers are the Lode King make. The individual model designation for each is included in the accompanying Excel file – these trailers are all flat decks or step deck models. The individual VIN for each unit is also provided in the accompanying Excel file.

d. All of the vehicles affected by this recall are semi-trailers manufactured by Lode King Industries during the period from October, 2007 through March, 2021. The model year information is also included in the accompanying Excel file.

e. There are 330 semi-trailers included in this recall campaign. These trailers are built in tandem and tridem axle configurations. All of these trailers have been sold in Canada to Canadian customers.

f. At this point we must assume that all of these trailers have the non-compliance issue.

g. The nature of this defect relates to the bolts used to secure the Rear Impact Guard (RIG) onto the trailer frame. Our design and test data is based on using ¾" diameter bolts for four specific locations in this attachment design. For reasons that we have not been able to ascertain, someone in our production facility decided to substitute 5/8" diameter bolts instead. The picture on the next page helps illustrate this installation.

h. The vehicle system that is affected is the rear impact guard.

i. In 2007 Lode King began offering an optional bolt-on RIG, instead of the traditional weld-on version. The design that we built and tested to meet CMVSS 223 utilized ¾" diameter bolts passing horizontally through the rear attachment point of the RIG, into the trailer frame. We recently have added some new personnel in our shop and it seems they have been reading the drawings more thoroughly than previously. Questions arose as to why we had been using 5/8" diameter bolts for this installation instead of the ¾" bolts called for on the drawing. Upon further investigation we learned that our last purchase of the ¾" bolts was in 2015. Regardless of that detail, we don't know when the substitution to the smaller 5/8" bolts began.

j. To date we have had no customer complaints or warranty related issues because of the incorrect bolts being installed.

k. The potential safety risk due to this non-compliance would relate to a rear end collision, should another vehicle impact the RIG. Potentially these smaller bolts could give way at a force below what is required by CMVSS 223.

l. The corrective action for this non-compliance is, firstly, to inspect the bolts to determine if they are the required ¾" diameter, which will have 1 1/8" wrench flats on the head, or the incorrect 5/8" bolts with 15/16" wrench flats on the head. If the smaller bolts are found, they must be changed to the correct ¾" diameter, Grade 8 bolts, torqued to the correct specification. The parts are already drilled to accept a ¾" bolt so no additional drilling or cutting should be required.

m. Other than changing out these bolts to the correct size of fastener, it seems there is little else that can be done to minimize the risk in advance. Simply being aware of this potential risk will, hopefully, prompt customer to address this need quickly.

n. We anticipate sending out the customer notification letters within the next two weeks, as soon as you assign the Recall Campaign number and give the go ahead.

Our point of contact here at Lode King will be the undersigned, Director of Engineering. We look forward to working with you to swiftly address this issue and get this corrective action in place.

Yours truly,
Lode King Industries

D. Roy MacLean, P.Eng.

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Director of Engineering

