

14 April, 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](mailto:jeremy.hamilton@tc.gc.ca)

**Re: Notice of Defect 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 defect found with the steering mechanism on the self-steering axle of 122 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. The defective axle has been designed and supplied to Lode King Industries by Dexter Axle Company. They have assigned their campaign number SB009R to this effort. 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 – most of these trailers are flat 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 July, 2017 through December, 2019. The model year information is also included in the accompanying Excel file.
- e. There are 122 semi-trailers included in this recall campaign. These trailers are built in three and four 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 defect.
- g. The nature of this defect relates to the bolts used to secure the steering arm onto the steering knuckle of this self-steering axle. In certain circumstances it is possible to overload these bolts, causing them to fail catastrophically. In that event, the steering linkage may come loose from the trailer. Should this occur, the steering function for this axle would no longer be controlled.
- h. This defect affects the steering arm connected to the steering linkage on the self-steering lift axle of these semi-trailers.
- i. We would refer you to the Dexter information to understand the genesis of this defect, as per the attached letter from Dexter.
- j. Dexter first brought this issue to our attention with their Service Bulletin SB009, dated 28 October, 2019. This bulletin was revised and renamed as SB009R, dated 4 December, 2019. To date we have had three (3) units that failed in this way, while in service. We began performing this corrective action as soon as Dexter identified the problem and solution. To date we have applied the initial SB009 corrective action to 16 of the affected 122 trailers. Following the issuance of SB009R we have applied that corrective action to an additional 29 units.
- k. The potential safety risk due to this non-compliance would relate to the steering linkage coming free from the trailer while travelling on the highway. If this linkage were to come free there is also a risk that the vehicle may go out of control with the self-steering axle free to steer in an uncontrolled manner, potentially leading to a crash.
- l. The corrective action for this non-compliance is outlined in the Dexter SB009R Service Bulletin. The bolts will be inspected to ensure they are still intact and properly torqued. Then welds are added to further secure the steering arm to the steering knuckle. This work will be accomplished through our dealer network.
- m. Other than inspecting these bolts to ensure they are intact, 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.  
Director of Engineering