

**RECEIVED** By Recall Management Division at 3:15 pm, Oct 19, 2012

## STRICK TRAILERS, LLC

225 Lincoln Highway Fairless Hills Pennsylvania, USA 19030.0009 215.949.3600

October 17, 2012

## VIA EMAIL AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

Associate Administrator for Enforcement Attention: Recall Management Division (NVS-215) National Highway Traffic Safety Administration 1200 New Jersey Avenue, SE Washington, D.C. 20590 RMD.ODI@dot.gov

Re: NHTSA Campaign Number 12V-419

Dear Administrator:

This letter is a supplement to the Strick Trailers, LLC ("Strick") initial letter of notification dated August 28, 2012. Pursuant to Title 49 of the Code of Federal Regulations, Part 573, Section 573.6, please be advised as follows:

1. Chronology of events: The principal event that was the basis for determining that a potential defect relating to motor vehicle safety may exist was the report by Commercial Trailer Leasing, Inc. ("CTL") of excessive bushing wear in Meritor, Inc. air-ride suspension components following replacement of similarly worn bushings on the same units approximately one month earlier. This was reported to Strick by CTL on or about August 21, 2012. Prematurely worn bushings had previously been replaced on approximately 40 CTL units. Four units had also been found to have fractures in the sub-frame. Out of an abundance of caution, Strick filed its initial letter of notification to NHTSA on August 28. Subsequent inspection of trailers available at the customer's sites revealed a total of five potential defects: excessive bushing wear in the Meritor, Inc. air-ride suspension components; bogie sub-frame fractures above the air bags; bogie squareness; fractures in the cross-member at the front of the bogie sub-frame; and fractures in the PSI control box bracket. Repairs on inspected units were immediately initiated, and a full remedy plan has now been determined.

2. Remedy plan: We recommend that the customer promptly arrange for inspection of each unit for potential defect. In the event one or more defects are identified, we recommend that the customer arrange for service to correct the condition(s) as follows:

Worn bushings and, if necessary, upper control arms in the Meritor, Inc. air ride suspension should be replaced.

Fractured bogie sub-frames will require either repair, including the addition of stiffening gussets, or replacement.

Bogie sub-frames out of square by more than 0.375" require replacement.

Cross-members at the front of the bogie sub-frame with evidence of fractures require replacement.

Fractures in the PSI control box bracket require repair and reinforcement.

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Strick will reimburse the customer for its purchase of replacement bushings and, if necessary, upper control arm assemblies, as well as for the reasonable direct labor costs required to install them to the extent such support is not provided by Meritor, Inc. Strick will also provide the customer with complete bogie sub-frames, cross-member assemblies and PSI bracket reinforcements without cost and will reimburse the customer for the reasonable direct labor costs required to effect the modifications. The inspection and remedy plan is set forth in greater detail in the proposed customer notification letter and accompanying inspection and repair guidelines enclosed for your approval.

Please contact me at the number below if you have any questions or comments. We will send out the customer notification letters as soon as the proposed form is approved by NHTSA.

Very truly yours,

Solomon

Shari M. Solomon General Counsel