LINCOLN OFFICE
SUITE 500
301 SOUTH 13TH STREET
LINCOLN, NEBRASKA 68508-2578
TELEPHONE 402-437-8500
FAX 402-437-8558

OMAHA OFFICE
SUITE 525
10250 REGENCY CIRCLE
OMAHA, NEBRASKA 68114-3754
TELEPHONE 402-898-7400
FAX 402-898-7401

WOODS & AITKEN
L • L • P

MONICA L. FREEMAN
DIRECT: (402) 898-7421
EMAIL: MFREEMAN@WOODSAITKEN.COM
WWW.WOODSAITKEN.COM

PLEASE RESPOND TO OMAHA ADDRESS

DENVER OFFICE
SUITE 525
8055 EAST TUFTS AVENUE
DENVER, COLORADO 80237-2835
TELEPHONE 303-606-6700
FAX 303-606-6701

WASHINGTON, D.C. OFFICE
SUITE 200
2154 WISCONSIN AVENUE, N.W.
WASHINGTON, D.C. 20007-2280
TELEPHONE 202-944-9500
FAX 202-944-9501

April 27, 2012

12V-175
(15 Pages)

VIA CERTIFIED MAIL AND ELECTRONIC MAIL
RMD.ODI@dot.gov

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS–215)
1200 New Jersey Avenue, SE.
Washington, DC 20590

Re: Reinke Manufacturing Company, Inc. Part 573 Report Submission

Dear Sir or Madam:

Enclosed please find the following documents that I am submitting on behalf of our client Reinke Manufacturing Company, Inc. ("Reinke"):

- Part 573 Report
- Related Documents
- Proposed Owner Notification Letter & proposed envelope

Reinke is in the process of preparing an inspection form that it intends to enclose in the owner notification letter. The inspection form will be forwarded to NHTSA as soon as possible for review. This is a time sensitive issue for Reinke's customers, so to the extent possible, we request an expedited review and approval of the owner notification letter so that it can be sent out promptly.

Please let me know if you have any questions or concerns regarding the attached. I look forward to your response.

Sincerely,

Monica L. Freeman (IKM)

Monica L. Freeman

Enclosures
cc: Reinke Manufacturing Company, Inc. (*w/ encl.*)

00458863

PART 573 Defect and Noncompliance Report

Date: April 27, 2012

This report serves as Reinke Manufacturing Company, Inc.'s ("Reinke") notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a defect related to motor vehicle safety exists in certain intermodal chassis. Reinke decided that this defect existed in these vehicles on April 24, 2012.

I. Manufacturer, Designated Agent, and Other Chain of Distribution Information

Manufacturer's corporate name: Reinke Manufacturing Company, Inc.

Vehicle brand or trademark name owner(s) (where applicable): Reinke

Designated Agent (imported vehicles): N/A

If this notification concerns a defective or noncompliant component that the above identified manufacturer did not manufacture, identify that component and provide the name, address, and phone number of the manufacturer of the component (if this manufacturer is unknown, provide this information as to the supplier of the component):

Component: Fully dressed axles (i.e. preassembled by the manufacturer and delivered to Reinke with the hub, bearing, seal, hub cap/gasket, drum, brake shoes, auto slacks and brake pods already installed). Specifically the component is a Power Products assembled axle with a FUWA axle and Stemco bearing package which includes the seal, bearings, Pro-Torq nut, keeper (locking ring) and hub cap.

Supplier/Manufacturer: Power Products World Wide Heavy Duty (trademark)
Parts Distributing Company

Corporate Office:
4050 Corporate Drive
Suite 400
Grapevine, TX 76051
(817) 251-4680

Name, address, email, and phone and fax numbers for the person(s) to whom inquiries about this report should be directed:

Tim Goldhammer
Vice President of Marketing
Reinke Manufacturing Company, Inc.
PO Box 566
5235 Reinke Road
Deshler, NE 68340

Email: TimGoldhammer@reinke.com
Phone: (402) 365-7251
Fax: (402) 365-4370

Manufacturer's assigned campaign number (where applicable): N/A

II. Identification of the Recall Population and Its Size

Complete the tables below for each group of vehicles subject to this notification. Additional tables may be necessary where there are more than three groups subject to a notification.

Make: Reinke
Model: Intermodal extendable chassis for transportation of 20' and 40' containers
Model Year (s): 2010
Inclusive dates of manufacture (month and year): October 2009
Body Style/Type (for non-passenger cars): Extendable Chassis
Other information necessary to describe these vehicles (VIN range): 4C6MS4220A1
Total number of these vehicles: 1

Make: Reinke
Model: Intermodal tank chassis for transportation of 40’ tanks
Model Year (s): 2011, 2012
Inclusive dates of manufacture (month and year): December 2010 through March 2012
Body Style/Type (for non-passenger cars): Intermodal Tank Chassis
Other information necessary to describe these vehicles (VIN range): 4C6CT4121B1 thru 4C6CT4122B1 4C6CT4428C1 thru 4C6CT4429C1 4C6CT4126C1 thru 4C6CT4121C1 4C6CT4121C1 thru 4C6CT4127C1 4C6CT4126C1 thru 4C6CT4123C1
Total number of these vehicles: 157

Make: Reinke
Model: Intermodal container chassis for transportation of 40’ container
Model Year (s): 2012
Inclusive dates of manufacture (month and year): July 2011
Body Style/Type (for non-passenger cars): Intermodal Container Chassis
Other information necessary to describe these vehicles (e.g., VIN range, GVWR or class for trucks, displacement for motorcycles, and number of passengers for buses): 4C6CC4133C1
Total number of these vehicles: 1

Make: Reinke
Model: Intermodal tank chassis for transportation of 20’ tanks
Model Year (s): 2011, 2012, 2013
Inclusive dates of manufacture (month and year): June 2010 through April 2012
Body Style/Type (for non-passenger cars): Intermodal Tank Chassis
Other information necessary to describe these vehicles (VIN range): 4C6CT4426B1 thru 4C6CT442XB1 4C6CT4429B1 thru 4C6CT4424B1 4C6CT4424B1 thru 4C6CT4423B1 4C6CT4421B1 thru 4C6CT4423B1 4C6CT4420B1 thru 4C6CT4423B1 4C6CT4422C1 thru 4C6CT4427C1 4C6CT442XC1 thru 4C6CT4420C1 4C6CT4426C1 thru 4C6CT4423C1 4C6CT4426C1 thru 4C6CT4421C1 4C6CT4426C1 thru 4C6CT442XC1 4C6CT4429C1 thru 4C6CT4421C1 4C6CT4426C1 thru 4C6CT4429C1 4C6CT4422C1 thru 4C6CT4426C1 4C6CT4422C1 4C6CT4428C1 thru 4C6CT442XC1 4C6CT4426D1 thru 4C6CT4427D1
Total number of these vehicles: 348

Provide the following information as to <u>all</u> the groups of vehicles:

Grand total number of vehicles: 507

The percentage of the recall population you estimate actually contain the defect or noncompliance: 6.5%

Identify and describe how the recall population was determined (e.g., on what basis the recalled models were selected and how the inclusive dates of manufacture were determined):

On March 30, 2012, Reinke received a report from a customer concerning an intermodal tank chassis that experienced the loss of a set of duals which separated from a chassis built by Reinke.

Following this incident, a similar Reinke chassis built at approximately the same time as the chassis that experienced the loss, was removed from operation and inspected. That inspection revealed that a locking ring that secures the spindle nut was missing from one side of one axle supplied by Power Products.

Reinke then contacted Power Products and asked them to determine the cause of the loss and for a list of the universe of potentially suspect axles. In response, Power Products provided Reinke with a list of axles that it believed required inspection. Based on that information, Reinke created a list of Reinke-manufactured chassis built with the axle serial numbers provided by Power Products. On April 4, 2012, the customer was provided with a list of twenty-five Reinke chassis that contained the Power Products axles, and for which Reinke requested that the customer pull from service for inspection of the Power Products axles. On or about April 9, 2012, Reinke requested that, in addition to the twenty-five chassis already identified, the customer randomly select five units from an earlier shipment of twenty-four units that were also outfitted with the Power Products axles for an inspection. That list of twenty-four units was provided to Reinke by Power Products. The customer informed Reinke that it would voluntarily inspect all Reinke chassis equipped with Power Products axles.

Reinke subsequently inspected twenty axles that it had in its inventory and of those twenty, the locking ring device was not correctly installed on one axle. Reinke then contacted Power Products and requested an inspection of fifty-two chassis that were at Reinke's facility, awaiting delivery to its customer. On April 23, 2012, Fleet Pride inspected the fifty-two chassis (208 wheel ends) on behalf of Power Products and its inspection found that of those, three locking rings were not installed properly. Based on this inspection, on April 24, 2012, Reinke decided to implement a recall for the entire universe of Reinke chassis that are equipped with Power Products axles.

Additionally, Reinke had a conference call on April 24, 2012, with a customer to discuss a related issue in the same units that were exhibiting excessive wheel end play. Reinke and Power Products conducted additional inspections to confirm the concerns that had been raised by a customer regarding wheel end play. As discussed in more detail in the report below, Reinke decided on April 27, 2012, to include an inspection and possible adjustment of the Power Products axles to address the wheel end play issue at the same time the locking ring issue is addressed.

Describe how the recall population is different from any similar vehicles not subject to this notification:

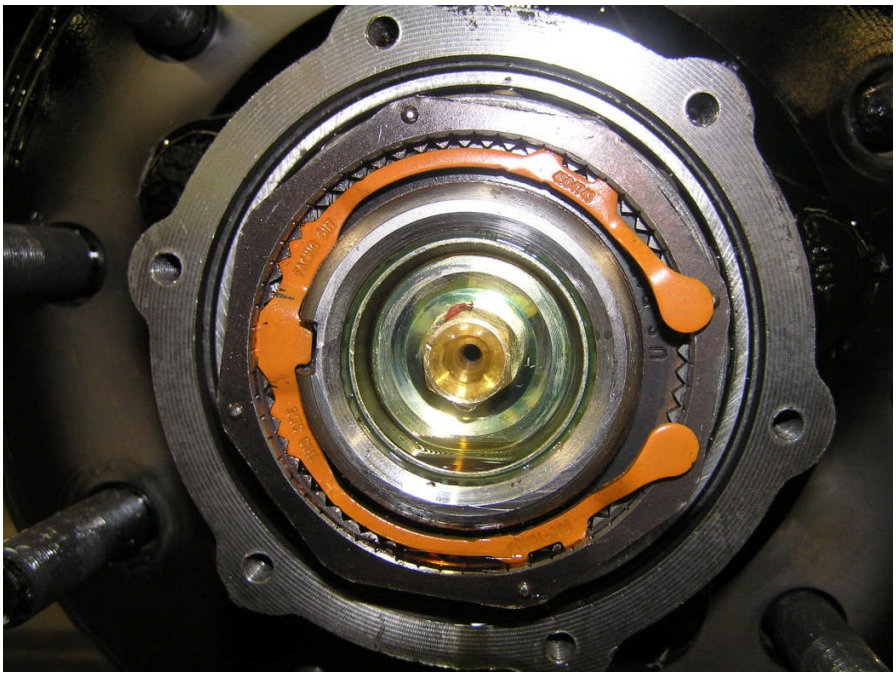
Reinke has received no reports of issues concerning any defects of the nature set forth in this report for chassis equipped with axles manufactured by vendors other than Power Products and thus this notification is limited only to Reinke-manufactured chassis equipped with the Power Products axles.

III. Description of the Defect or Noncompliance and Chronology of Events

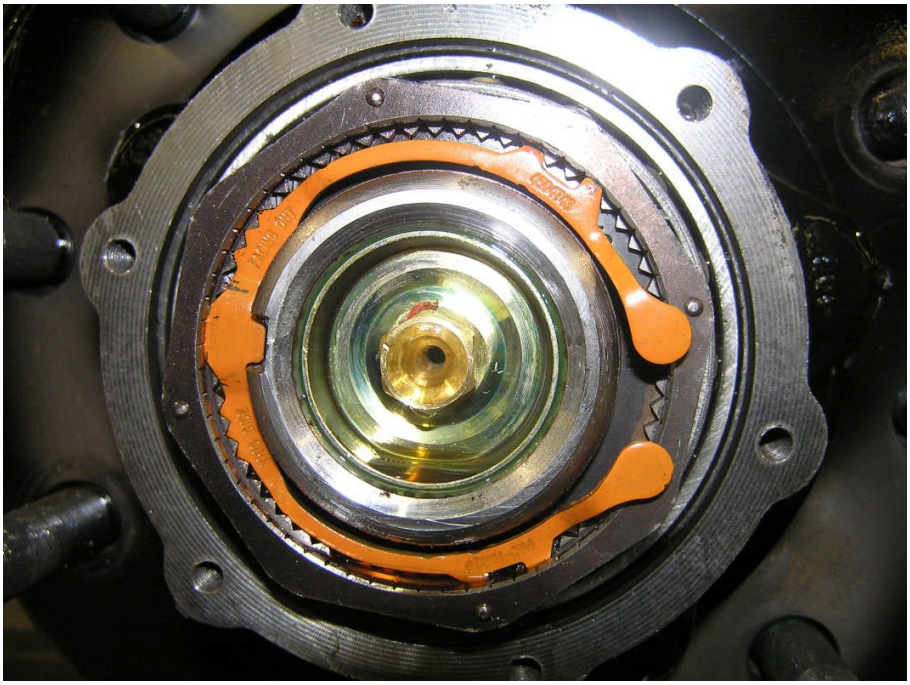
Describe the defect or noncompliance, including a summary and detailed description of the nature and physical location (if appropriate) of the defect or noncompliance. Graphic aids should be provided where necessary.

There are two defects to be addressed in this recall. The first involves the lack of or improper installation by Power Products of an orange-colored locking ring that secures the spindle nut on the Power Products axle. See additional photos below.

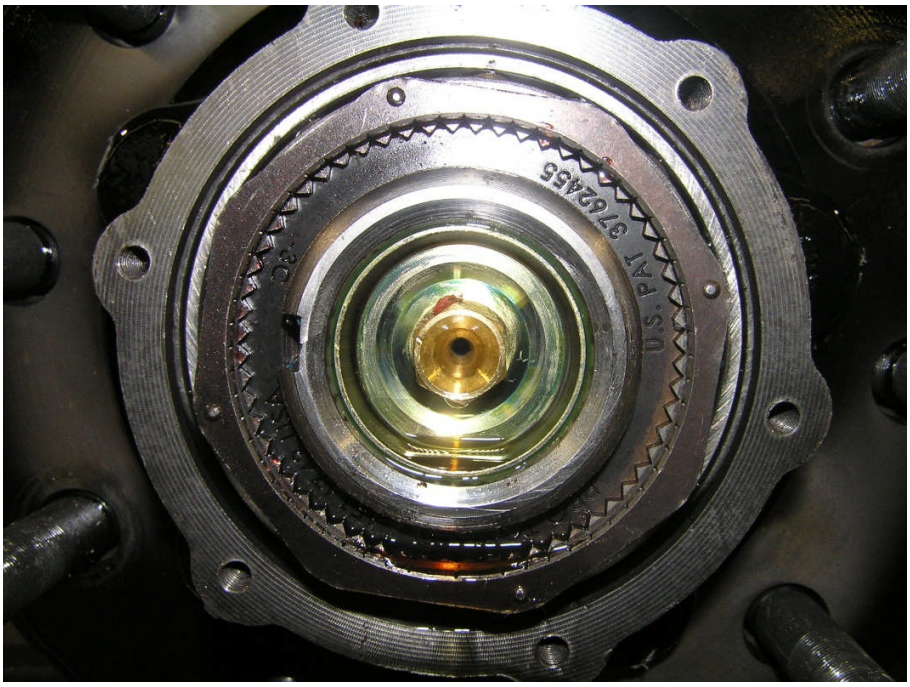
Locking ring installed correctly.



Locking ring installed incorrectly.



Missing locking ring.



The second defect to be addressed involves an issue concerning excessive wheel end play due to Power Products' improper torqueing of the spindle nut on the axles it supplied to Reinke.

Describe the cause(s) of the defect or noncompliance condition.

It is believed that the first defect was caused by lack of or improper installation of the locking ring during manufacture by Power Products. Based on inspection and through cooperation with the manufacturer, Power Products, it is believed that the lack of or improper installation of the locking ring on the Power Products axle may cause wheel separation.

It is believed that the second defect was caused by improper torqueing during manufacture of the axles by Power Products. Improper torqueing of the spindle nut may cause premature wear to the bearings which may ultimately result in wheel separation.

Describe the safety consequence(s) of the defect or noncompliance condition.

Potential safety consequences of wheel separation caused by the defect could include:

- Loss of control of the motor vehicle
- Detached dual wheels may enter the roadway and put other drivers at risk

Identify any warning(s) that may precede the defect or noncompliance condition.

The wheel may wobble excessively prior to separation.

***For defects*, provide a dated, chronological summary of all the principle events that were the basis for the determination that the defect is related to motor vehicle safety, including a summary of all warranty claims, field or service reports, and other information such as numbers of crashes, injuries and fatalities.**

March 29, 2012	Intermodal tank chassis manufactured by Reinke experienced loss of set of duals. Minimal damage and no injuries resulted.
March 30, 2012	Reinke sales representative informed of March 30 incident by customer and Reinke immediately begins investigation.
April 3, 2012	Reinke determines that the axles at issue were manufactured by Power Products.
April 4, 2012	Reinke e-mails customer requesting removal and inspection of twenty-five units based on list of axle serial numbers provided by Power Products that were included in a July 2011 shipment.
April 9, 2012	Reinke transmits letter to customer requesting removal and inspection of twenty-five units and an additional removal and inspection of five units randomly selected from a previous chassis shipment equipped with Power Products axles, including instructions for inspection.

April 11, 2012	Reinke notified that customer plans to remove and inspect all chassis built by Reinke and equipped with Power Products axles.
April 12, 2012	Reinke e-mails customer with inspection and repair procedures for the identified units.
April 18, 2012	Reinke inspects twenty Power Products axles in inventory and finds that locking ring device is not installed correctly on one axle.
April 23, 2012	Fleet Pride conducts inspection, on behalf of Power Products, of fifty-two units (208 wheel ends) in Reinke's lot awaiting delivery to customer. Fleet Pride inspection shows that three axles had locking rings that were improperly installed.
April 24, 2012	Reinke reviews inspection report of Fleet Pride and determines that a recall of all Reinke-manufactured chassis equipped with Power Products axles is necessary.
April 24, 2012	Reinke has telephone conference with customer to discuss a related issue in the same units containing Power Products axles that were exhibiting excessive wheel end play.
April 25, 2012	Reinke and Power Products conducted inspections of two units (8 wheel ends) and confirmed the concerns raised by the customer regarding wheel end play.
April 27, 2012	Reinke decides to include an inspection and possible adjustment of the Power Products axles to address the wheel end play issue at the same time the locking ring issue is addressed.

IV. The Remedy Program and Its Schedule

Describe the program for remedying the defect or noncompliance, including the plan for reimbursing those owners and purchasers who may have incurred costs to remedy the defect or noncompliance before receiving the manufacturer's notification concerning that defect or noncompliance. Also include, where applicable, details with dates concerning any production remedy that was conducted or will be conducted.

Pre-notification repairs:
Reinke will include a statement concerning the possible eligibility for reimbursement for the cost of repair or replacement in its notification letter to the owner and will provide a toll-free number that can be used to obtain information on reimbursement. The date range for eligibility will be from April 27, 2011 through 10 calendar days after the owner notification letters are mailed (approximately May 14, 2012). The reimbursed cost will be the lesser of (1) the amount paid by the owner to remedy the vehicle or (2) the cost of parts, labor, and miscellaneous fees (disposal, taxes, etc.). Reimbursement will be denied if manufacturer's original or extended warranty

would have provided for a free repair or if the pre-notification remedy did not address the defect at issue or was not reasonably necessary to correct the problem. Reinke will request validation of the reimbursement through copies of receipts, invoices and inspection reports.

With regard to production remedies, Reinke has already inspected Power Products axles that were in inventory and completed units and repaired any defects relating to the locking ring issue prior to installation of the axles on Reinke chassis. Reinke has commenced inspections of completed units and Power Products axles in inventory for the wheel end play issue. Reinke does not intend to utilize any additional Power Products axles in the future.

Remedy plan:
The units identified in this Part 573 report should be removed from service and inspected using the procedure attached as Exhibit A. Reinke through Power Products will provide a $75.00 per wheel end labor reimbursement for the inspection and any necessary retorqueing and repairs, plus supplies to include oil and gaskets. If a replacement part is necessary, the owner should contact Tysen Hissong with Reinke Manufacturing, Inc. who will contact Power Products who will send the necessary replacement parts at no charge.

Provide the estimated date(s) on which owner and purchaser notifications will be issued and the estimated date(s) for completion of those notifications.

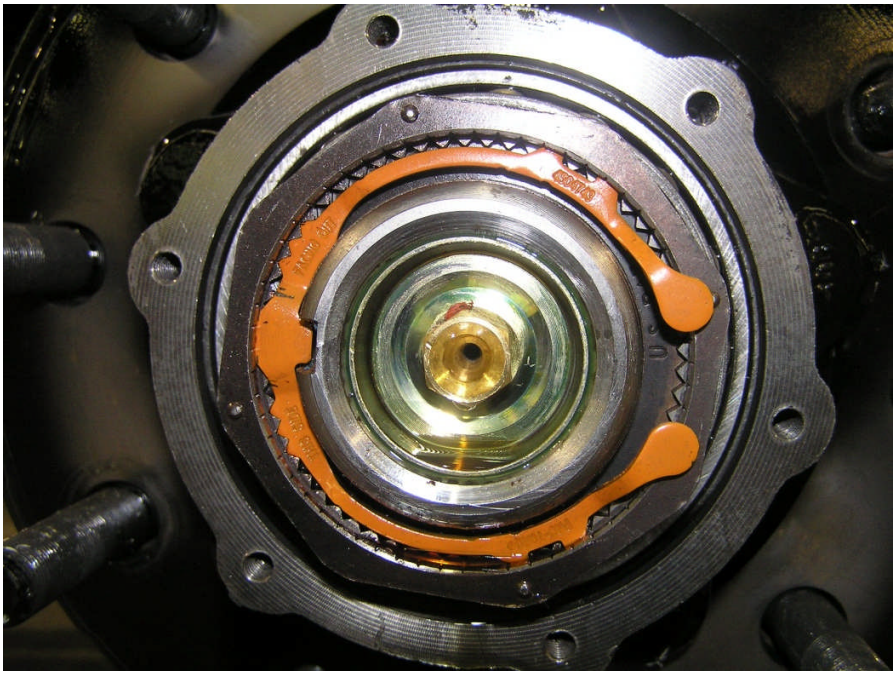
Owner/purchaser notification letters will be issued on May 4, 2012, or earlier upon authorization from NHTSA. Reinke anticipates that notifications will be complete on or before May 7, 2012.

Provide the estimated date(s) on which dealer and distributor notifications will be issued and the estimated date(s) for completion of those notifications.

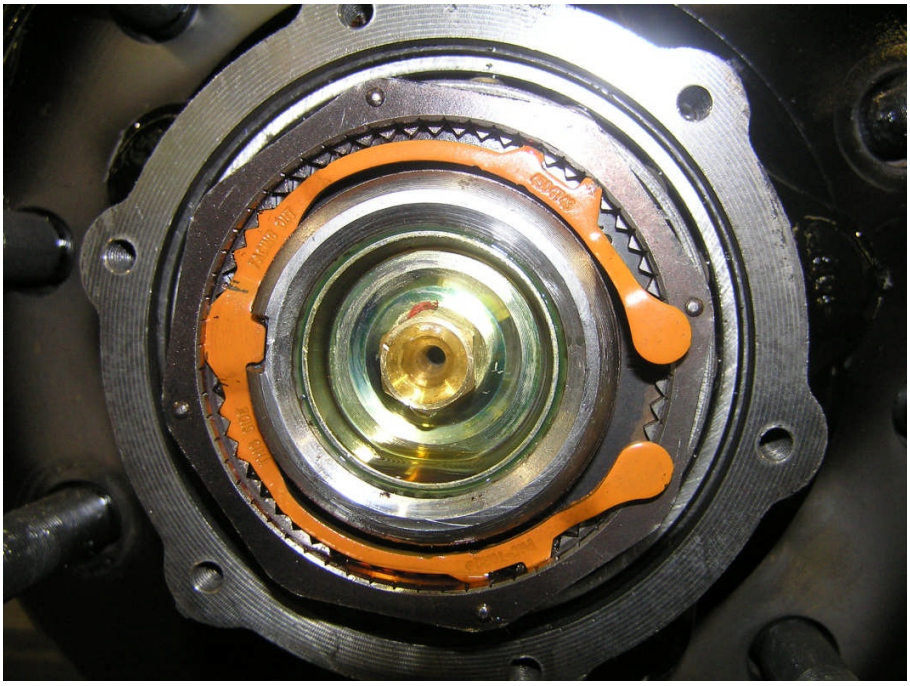
N/A

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

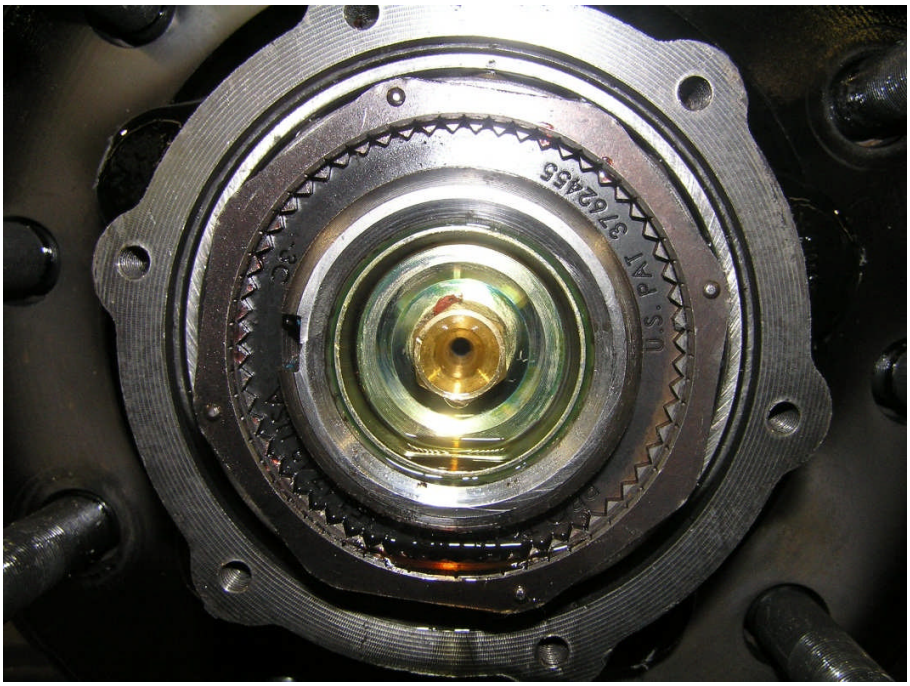
Locking ring:
Remedied locking ring.



Recalled locking ring.



Recalled locking ring.



Wheel end play:
Wheel end play should be set at a tolerance of .001 to .005 per Technology & Maintenance Council recommended practice RP-618.

V. Related Documents

See attached documents. Certain of the attached documents were transmitted to NHTSA by e-mail on April 17, 2012, pursuant to the requirements of 49 C.F.R. § 579.5, before Reinke determined that a defect relating to motor vehicle safety existed in the population of vehicles set forth herein.

EXHIBIT A

PRO-TORQ NUT RETAINING CLIP PLACEMENT AND WHEEL BEARING ADJUSTMENT PROCEDURE

OVERVIEW:

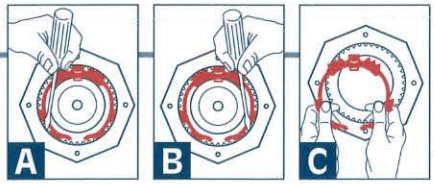
THE PURPOSE OF THIS INSPECTION IS TO ENSURE THAT THE WHEEL BEARINGS ARE PROBERLY ADJUSTED AND THE PRO-TORQ NUT RETAINING CLIP OR "KEEPER" IS IN PLACE AND INSTALLED PROPERLY.

PROCEDURE:

1. TAG OUT CHASSIS AND CHOCK TIRES.
2. JACK UP THE WHEEL AND RELEASE THE BRAKE IN ORDER TO PERFORM THE WHEEL BEARING ADJUSTMENT.
3. CLEAN AROUND HUB CAP TO HELP PREVENT CONTAMINATION OF THE BEARING LUBRICATION. PLACE A CATCH PAN OR ABSORBENT PAD IN RIM TO PREVENT OIL OR GREASE FROM GETTING ON RIM.
4. REMOVE HUB CAP BEING CAREFUL TO CONTAIN THE LUBRICATION FROM THE HUB.
5. PROCEED TO THE ATTACHED "STEMCO, PRO-TORQ INSTALLATION PROCEDURE & WHEEL BEARING ADJUSTMENT"
6. FOLLOW STEPS 1 THROUGH 5 (NOTE: IN STEP 2 AND STEP 3 FOLLOW THE "WITH HUB/DRUM/WHEELS" PROCEDURE). **STOP** AFTER STEP 5 **DO NOT** PROCEED TO STEP 6.
7. AFTER ADJUSTMENT IS PERFORMED, CLEAN/REPLACE GASKET AS NEEDED. CLEAN SURFACES AND REASSEMBLE.
8. TORQUE HUB CAP FASTENERS TO 12-16 LB FT.
9. IF THE HUB WAS EQUIPPED WITH OIL LUBRICATION, REFILL HUB WITH AN OIL THAT HAS A DESIGNATION OF "API-GL-5 (AMERICAN PETROLEUM INSTITUTE – GEAR LUBRICANT NUMBER 5) OR SAE 85W/140".
10. CLEAN ANY RESIDUE THAT MAY HAVE GOTTEN ON HUB/RIM AS RESULT OF THE ADJUSTMENT / INSPECTION.
11. REMOVE JACK, REMOVE OUT OF SERVICE TAG AND REMOVE WHEEL CHOCKS FROM UNIT.

PRO-TORQ® Installation Procedure & Wheel Bearing Adjustment

STEP 1.

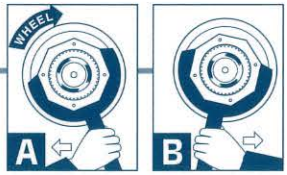


Remove the Keeper from the Nut:

A, B, C

Use a screwdriver to carefully pry the keeper arm from the undercut groove on each side until the keeper is released.

STEP 2.



Seat the Bearing:

With hub or hub/drum only:

Using a torque wrench:

A **(1)** Tighten the nut to 200 ft-lbs. Spin the wheel at least one full rotation.
(2) Tighten the nut to 200 ft-lbs. Spin the wheel at least one full rotation.
(3) Tighten the nut to 200 ft-lbs.

B Back the nut off until it is loose.

With hub/drum/wheels:

A Tighten the nut to 200 ft-lbs while the wheel is rotating.

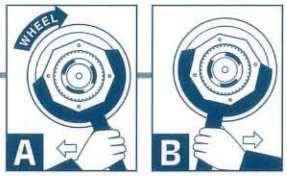
B Back the nut off until it is loose.

TOOLS REQUIRED FOR INSTALLATION

Part Numbers	(3/4" Drive) Socket Req'd	Owatonna Co. Ref. Part No.	Euclid Int'l Ref. Part No.
Trailer Axle Nut			
447-4723 447-4724	4 13/16" 8 point	1941	E-1597
Trailer Axle Nut			
447-4743	3 3/4" 8 point	1925	E-1925
449-4973	4 3/8" 8 point	1917	E-1917
Steering Spindle Nut			
448-4836 448-4837 448-4838	2 1/2" 6 point	1921	E-1921
448-4839	2 5/8" 6 point	1922	E-1922
448-4864	3" 6 point	1906	E-1906
448-4865	3" 6 point	1906	E-1906
Drive Axle Nut			
449-4904	4 1/8" 6 point	1915	E-1915
449-4973	4 3/8" 8 point	1917	E-1917
449-4974	3 3/4" 8 point	1925	E-1925
449-4975	3 3/4" 8 point	1925	E-1925

Note: Ford application 12,000 lbs SIFCO Steer Axle requires OEM inner washer to be installed prior to installation of PRO-TORQ® nut system.

STEP 3.



Adjust The Bearing:

With hub or hub/drum only:

Using a torque wrench:

A **(1)** Tighten the nut to the adjusting torque. Spin the wheel at least one full rotation.
(2) Tighten the nut to the adjusting torque. Spin the wheel at least one full rotation.
(3) Tighten the nut to the adjusting torque.

B Back the nut off one raised face mark (according to chart).

With hub/drum/wheels:

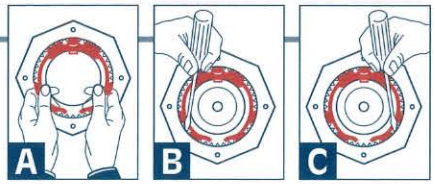
A Tighten the nut to the adjusting torque while the wheel is rotating.

B Back the nut off one raised face mark (according to chart).

ADJUSTING TORQUE AND BACKOFF

Part Numbers	Adjusting Torque	Backoff
Trailer Axle Nut 447-4723 447-4724 449-4973	100 ft-lbs	1/8 turn
Trailer Axle Nut 447-4743	100 ft-lbs	1/4 turn
Steering Spindle Nut 448-4836 448-4838 448-4839 448-4864 448-4865	100 ft-lbs	1/4 turn
Steering Spindle Nut 448-4837	100 ft-lbs	1/3 turn
Drive Axle Nut 449-4904 449-4973 449-4974 449-4975	100 ft-lbs	1/8 turn

STEP 4.



Install the Keeper:

ORANGE SIDE FACING OUT

A Insert the keeper tab into the undercut groove of the nut and engage the key-way tang in the axle keyway. Insert keeper tab with bent legs facing out.

B Engage the mating teeth.

C Compress and insert the keeper arms, one at a time, into the undercut groove with a screwdriver.

For Steering Spindle Nut 448-4836, 448-4839, 448-4864, and 448-4865

A Align the flat of the keeper with the milled flat on the spindle and insert the single keeper tab into the undercut groove of the nut. Insert keeper tab with bent legs facing out.

B Engage the mating teeth.

C Compress and insert the keeper arms, one at a time, into the undercut groove with a screwdriver.

STEP 5.

Inspect the Installation:

A **Failure to follow this instruction could cause the wheel to come off and cause bodily injury.** Make sure that the keeper tab and keeper arms are fully seated into the undercut groove. Inspect keyway tang to insure it does not contact the bottom of the keyway. If contact exists, immediately notify your PRO-TORQ® representative.

THIS PROCEDURE WILL CONSISTENTLY PRODUCE A BEARING SETTING OF .001" TO .003" END PLAY.

STEP 6.

Acceptable End Play:

The dial indicator should be attached to the hub or brake drum with its magnetic base. Adjust the dial indicator so that its plunger is against the end of the spindle with its line of action approximately parallel to the axis of the spindle.

Grasp the wheel or hub assembly at the 3 o'clock and 9 o'clock positions. Push and pull the wheel-end assembly in and out *while oscillating the wheel approximately 45 degrees.* Stop oscillating the hub so that the dial indicator tip is in the same position as it was before oscillation began. Read the bearing end-play as the *total* indicator movement.

*Acceptable end-play is .001"-.005."

For single nut self-locking systems, consult manufacturers' specifications. STEMCO assumes no responsibility for bearing warranty.

WARNING

Failure to follow this instruction could cause the wheel to come off and cause bodily injury. The PRO-TORQ® Spindle Nut is sold as an assembly with the keeper in place. **DO NOT** attempt to place the nut on the spindle or tighten or loosen the nut on the spindle while the keeper is locked inside the nut. Doing so may deform the keeper and allow the nut to unthread during operation. **DO NOT** bend or manipulate keyway tang in any way. Doing so may cause the tang to break off in service. Failure to back off the nut will cause the bearings to run hot and be damaged.

PRO-TORQ®

ADVANCED AXLE SPINDLE NUTS

PRO-TORQ® is a registered trademark of STEMCO LP

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