RECEIVED
By Recall Management Division at 9:25 am, Jan 24, 2013

13E-004
(18 pages)

RIGID HITCH INCORPORATED

Manufacturers of Trailer Hitches & Towing Products · Distributors of Leading Trailer Hitch, Trailer Parts & Truck Accessory Lines
An ISO 9001:2008 Certified Company

FAX COVER PAGE

January 22, 2013

TO: National Highway Traffic Safety Administration

FAX: 202-366-7882
TOTAL PAGES: (18) INCLUDING COVER PAGE

Attached are the filing documents to notify you of our intentions to conduct a Voluntary Product Recall. Please review and advise if we have addressed the appropriate requirements to conduct the product recall.

Best regards,

Blane Wirth

Blane Wirth
800-624-7630 Corporate Office
952-895-9150 Corporate Fax
952-736-2220 Direct Office Line
blawir@rigidhitch.com

Safety Defect and Noncompliance Report Guide for Equipment

PART 573 Defect and Noncompliance Report[1]

On January 18, 2013, Rigid Hitch, Inc. decided that a defect which relates to motor vehicle safety exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: January 21, 2013

Furnish the manufacturer's identification code for this recall (if applicable): N/A

1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Rigid Hitch, Incorporated

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Mr. Blane H. Wirth, President Rigid Hitch, Inc.

Telephone Number: (952) 895-5001 **Fax No.:** (952) 895-9150

Name and Title of Person who prepared this report.

Blane H. Wirth, President Rigid Hitch, Inc

Signed:

Blane H Wirth

I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, ***for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide*****:**

Generic name of the item:

Make: Rigid Hitch **Model**: Heavy Duty Utility Bar

Part Number: HUB-3208 **Size**: 2"Drop 8" between Hole Centers. 2" sq. Solid Shank 1 x 3" Flange

Function: Hitch Component, Ball Mount for 2" receiver.

Other information which characterizes/distinguishes the items of equipment to be recalled: Pin Marking of Julian Date Code 33411-04812 located on the long side of the shank approximately 1-1/2" above the weld line

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996, through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period. .02%

II. Identifying the Recall Population

3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.

Model	Date Code	Number of Items Potentially Involved
HUB-3208	33411-04812	295

Total Number Potentially Affected by the Recall: 352

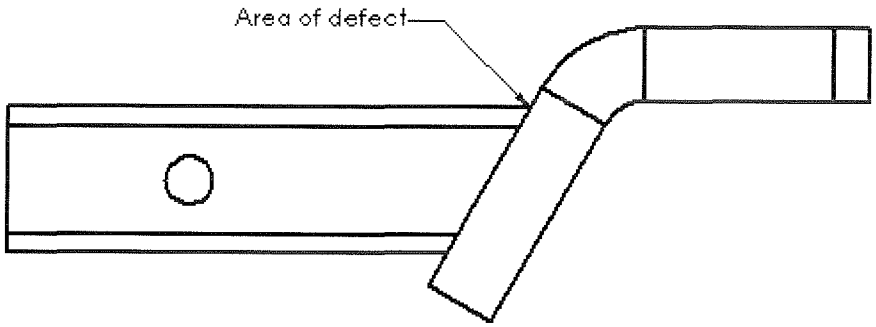
4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance: 15%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment: Defective product returned was marked with Julian Date Code 04512 Production records show that 295 pieces were manufactured in a single lot with the date codes 33411-04812.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

Weld placement at toe where the long side of the shank meets the bent flange was off creating an unacceptable amount of weld penetration into the shank. (see drawing)



Describe the cause(s) of the defect or noncompliance condition.
Torch angle and position of the weld on the toe were incorrect.

Describe the consequence(s) of the defect or noncompliance condition.
The reduced penetration of weld into the shank at the toe could cause the weld to fail.

Identify any warning which can (a) precede or (b) occur.
Cracking in the welds.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.
N/A

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:
N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims. See Attached Chronological Summary

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined. N/A

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

The process that created the condition for the defect was to simply butt the shank up to the flange and weld the two pieces together. New processes have been put in place. A bevel will be ground on the shank creating better penetration into the shank through the use of a fillet weld. The torch angle will be flattened out driving the root of the weld deeper into the seam. All returned product to be destroyed.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly. The remedy component will be assigned a new part number

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The recall condition was corrected on December 21,2012.

VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

1/22/13 File Part 573 report with NHTSA.

1/29/13 Send out Notification of recall to dealers

2/1/13 Send out Notification of recall to retail customers,

2/8/13 replacement parts on hand for remedy. National uniform recall to begin.

5/8/13 file first quarterly progress report with NHTSA

8/8/13 file second quarterly progress report with NHTSA

11/8/13 file third quarterly report with NHTSA

12/31/13 estimated date all owners will be notified- potential problem identifying owners who purchased point of sale with cash.

1/31/14 complete recall file final report with NHTSA

VII. Furnish Recall Communications

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. ***A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*** **Note: These documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.**

Chronological Summary of Defect in HUB-3208

20 Dec 12	5PM Customer Service Manager received an email from a customer with pictures of an HUB-3208 that separated at the weld. The incident did not result in personal injury and or damage to the vehicle or the trailer.
21 Dec 12	9AM Manufacturing Manager met in Customer Service Manager's office along with the President. Customer had a total of 15 of the HUB-3208's. It was decided to retrieve all 15 parts and replace with an alternate product.
21 Dec 12	10AM Manufacturing Manager took an HUB-3208 out of stock and cut it open. Upon inspection stock on hand was deemed to be in compliance.
21 Dec 12	1PM Manufacturing Manager had a meeting with an outside welding supplier to review the current welding process. It was decided to grind a bevel around the shank to help create better weld penetration. Weld angle was addressed as well and both process improvements were implemented. A new part was cut open and the result proved that the process improvements created better penetration.
21 Dec 12	Replacement parts were shipped out and call tags were issued to get the parts in question returned.
16 Jan 13	All 15 parts were returned. An inspection took place and found there were nine parts from production run dated 33411, and six parts dated 04512. The part that separated was from the lot dated 12045. All 15 parts were cut apart to inspect the welds. All nine from the lot dated 11334 were deemed sound. One of the six parts from 12045 was questionable and one was deemed to contain the defect.
17 Jan 13	The tentative decision was made to do a voluntary recall of the lot produced 04512-04812. There were 200 pieces in the lot in question. It was suggested to recall all product sold between 14 Feb 12 and 31 Jul 12. During that time 248 HUB-3208 were sold ensuring that we could capture the entire run in question.
17 Jan 13	The Rigid Hitch Voluntary Product Recall Procedure was reviewed. A Product safety committee was formed including the President, Vice President and all department heads. An emergency meeting was scheduled for 18 Jan 13. The Manufacturing Manager and the President began working on the required documentation for NHTSA.
17 Jan 13	A sample of the HUB-3208 welded with the new process was sent to an outside laboratory for testing. All further manufacture of the HUB-3208 was put on hold until the test results are returned.

18 Jan 13 11AM The emergency meeting of the product safety committee was held. The decision was made to recall both production runs made on Ole dated 33411-04812. 295 parts total. The decision was made to recall all HUB-3208's sold between 1 Nov 11 and 31 Jul 12. During that time 352 HUB-3208's were sold. Part 573 to be filed with NHTSA on or before 24 Jan 13.

21 Jan 13 Blane Wirth contacted the insurance carrier and notified them of our intention to perform a voluntary recall.

21 Jan 13 Test results came back and the HUB-3208 welded using the new production protocols passed.

22 Jan 13 Recall documentation faxed to NHTSA which included the following documentation:

1. Cover Sheet
2. Draft of PART 573 Defect Report
3. Chronological Summary of Defect in HUB-3208
4. Meeting Minutes – Product Safety Committee Emergency Meeting
5. Report on Hitch Testing – Model No. HUB-3208
6. Draft of Voluntary Product Recall – Dealer / Distributor
7. Draft of Voluntary Product Recall – Retail Purchaser

Meeting Minutes

Product Safety Committee Emergency Meeting

January 18, 2013

11:05 President Blane Wirth Called the meeting to order

A discussion took place regarding the decision to perform a voluntary product recall for part number HUB-3208 manufacture date code 04512-04812.

The following members were present:

Blane Wirth- President
Mark Kennedy- Vice President Marketing/ IT
Adam Schenck- Purchasing Manager
Tom Sanders Jr. - Warehouse Manager
Dave Rahm- Customer Service Manager
Eldon Nash- Manufacturing Manager
Betsy Kauffman- HR Manager
Curtis Hawkins- Accounting Manager
Bruce Lang- CEO is out of town but is monitoring the situation. Blane is reporting directly to Bruce.

The Rigid Hitch Voluntary Product Recall Procedure was reviewed.
Blane and Eldon have been working through the procedure and Blane has notes up to step 15 of 24.

Blane and Eldon will be responsible for filing all paper work. The required notification to NHTSA will be filed on or before January 23.

Blane Wirth will be the reporting party to NHTSA.

In discussing what went wrong that caused the non-compliance Eldon was unable to determine what was different between the production run of 95 pieces ran in November of 2011 of which nine returned samples were cut open and found to be in compliance, and the production run of 200 in February of 2012 that produced the non-compliance.

In November of 2011 the HUB-3208 was welded on the new robot (Ole) for the first time. In February 2012 the HUB-3208 was run on Ole once again. Nothing was changed with the programming. Since no definitive cause could be identified it was determined that there was a flaw in the programming of the HUB-3208 on Ole. For that reason the decision was made to expand the recall to include the 95 parts ran in November 2011 as well. Making the total to be recalled 295 pieces. These were the only HUB-3208's produced on Ole.

In December of 2012 after discussing this with outside advisors, new production protocols were established for making the HUB-3208/ HUB-3210. Including beveling the edges of the shank and changing the torch angle during welding.

Blane Wirth raised the question of the other parts in the HUB line. The HUB 3409, HUB-3411, and the HUB-3610 all have gussets and are not in question. The HUB-3210 like the HUB-3208 is non-gusseted. There were no HUB-3210's welded on Ole. The HUB-3210 was manufactured in March of 2012 but was hand welded.

Curtis raised the question of seeking legal counsel. Blane will be talking with the Insurance Carrier on January 21, and will defer to their suggestions on how to proceed.

Mark raised the question of how to control all communications in regard to the recall. He suggested creating a file on the server and Blane concurred, all other members were in agreement.

Les was identified as the contact person for all customers affected by the recall.

Mark raised the question of what options Rigid Hitch might offer to those affected. Replacement of like product including a hitch ball of the customer's choice attached replacement with a similar forged product or cash back. This will be decided in advance of notifications going to the dealers and the public. All members agreed that all options were acceptable.

Mark raised the question of how much public exposure Rigid Hitch wants to give this matter. The non-compliance is serious, but is out of the ordinary. The HUB-3208 represents only approximately .02% of total production during the time in question. Mark is considering adding the recall notice to the web page. This will be discussed further closer to the date of the notifications going out to the dealers.

Eldon raised the question of quarantining all remaining HUB-3208's until the test results come back on the sample welded using the new production protocols. All members agreed.

Blane raised the question of producing a letter to the employees. All members agreed that we want to control all communication about the recall and is to the company's best interest to communicate openly and honestly with the employees. Blane agreed to write a letter to the employees to be distributed by the end of business today.

Next Steps
Adam is to remove all HUB-3208's from stock.
Jr. is to move the HUB-3208's to the Red Tag Holding area.
Blane and Eldon will continue to work on all required paperwork.
Notification will go out to NHTSA on or before the January 23rd deadline.
Mark will start working on creating a server file for all communications and making a new form for the recall.
Blane will contact the insurance carrier and discuss legal requirements.
Blane and Mark will begin drafting the notifications to the dealers and the customers.
Eldon will provide Mark information on the dates of the expanded recall and provide a timeline of all HUB-3208's manufactured between November 2011 and December 2012.
After NHTSA has been contacted and response is received another meeting of the Product Safety Committee will be held.

12:00 Meeting was adjourned.

TESTLINK SERVICES, INC.
903 Guthrie St.
P.O. Box 221
De Soto, IA 50069

Report of Hitch Testing
Performed on a **Ball Mount Design**
in Accordance with SAE J684
Exceeds Class 4 – 16,000 lbs. Wt. Carrying
Model/Part Nos.: **HUB-3208**

Prepared for:
RIGID HITCH, INC.
Attn: Blane Wirth
3301 West Burnsville Parkway
Burnsville, MN 55337-9150

This Report prepared by:

Carl C. Andreasen
Project Engineer
Product Evaluation Dept.
Phone: 515-834-9050

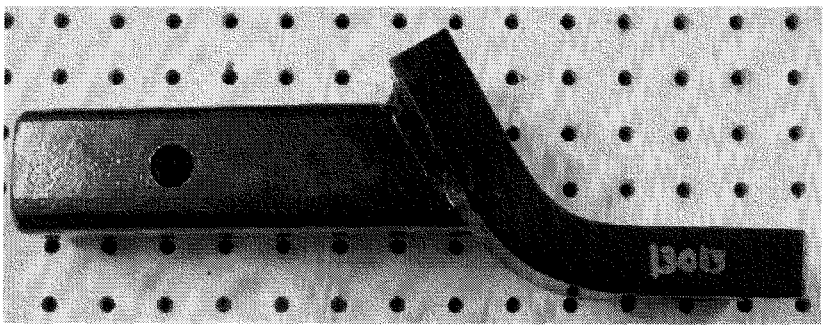
Introduction:

This report presents the results of testing performed on one ball mount design in accordance with the latest version of SAE J684, (Rev. JUL2005). This work was requested by Blane Wirth of Rigid Hitch Inc. and will be invoiced per purchase order number BW011713 (TSI proposal #515). The product was received on January 18, 2013 with the work expedited on January 21, 2013.

Summary of Results:

Specimen No. / **Part No.**	SAE J684 Rating Proofed to, Pounds	Comments
1 / **HUB-3208** Ball mount for 2" receivers	Exceeds Class 4, 16,000 GVWR	**Supports all extrapolated load values** (Total change in ball axis 0.3°)

Note: For projected ratings **that exceed the 10,000 pound limit** of this SAE J684 standard, extrapolated values are used for the test loads.



As Received

Test Procedure:

Per SAE J684, Table 3. The test specimens are secured to an essentially non-yielding frame simulation according to the manufacturers recommended installation instructions. All forces are then applied through an essentially non-yielding ball and ball mount with an onset rate of not more than 150 lbs./sec. A preload of 400 lbs. is used for initial axis readings in degrees.

Instrumentation:

The verification of load cell accuracy used for this project is by an Instron Model 3385H, serial #3217 with an NIST traceable calibration due date of December 5, 2012.

Sample as Submitted:

Type of Device: Hitch Component, ball mount for nominal 2" receivers.

Characteristic Design: HUB-3208

Specimen Detail:

Insert (shank): Nominal 2.0"sq. O.D., solid stock, 6.7" median length, with full butt-weld at 60° (± 1°) to ball support platform. The hole to accommodate a 0.62" lock-pin is centered 2.6" from the inserted end. **Permanent Marking:** (none apparent)

Ball Platform: Nominal 1.0" x 3.0" x 7.7" long with a nominal 60° bend producing a 3.0" horizontal platform for ball. The hole accommodates a 1.25" shank ball. **Permanent Marking:** (none apparent) **Marketing Label:** RIGID®, HITCH INCORPORATED/HD, MAXIMUM GROSS LOAD – 12,000 LBS, MAXIMUM TONGUE WEIGHT – 1,200 LBS, DO NOT EXCEED VEHICLE MANUFACTURES'S, GROSS TOWING WEIGHT RATING, BURNSVILLE MN V-5

Offset/Extension: 2.1" drop or a 1.1" rise and a 5.8" extension from anticipated location of the receiver lip to the ball centerline (8.3" from hole to hole).

TEST RESULTS:

Model/Part No.: **HUB-3208**

Specimen	**Table 3, Extrapolated Proof Loads for a Projected 16k Rating**				Supports all extrapolated load values **Yes / No** (° change)
	a. Downward Compressive **8,000 & 8,000**	b. Tensile Downward **5,210 & 2,400**	c. Compressive Downward **5,210 & 2,400**	d. and e. Transverse **3,700**	
1 (position)	0.3° (in drop)	0.1° (in rise)	0.1° (in drop)	(0.05") 0° (in rise)	**Yes (0.3°)**

Sample Disposition:

The test specimen from this project will be returned, ground freight, via UPS, per clients' request.

mydocsprojects13013jjh