



February 13, 2013

VIA Certified Mail – Return Receipt Requested

Mr. Ryan Kerk
President
Alumina, Inc.
DBA: Boatwheels
7450 Industrial Parkway
Lorain, OH 44053

NVS-215/rwg
12V-520

Re: Safety Recall Campaign 12V-520

Dear Mr. Kerk:

Our records reflect that Alumina, Inc. (Alumina) has yet to start its mandatory safety recall campaign concerning certain trailers it manufactured with certain 908 Yuma, 910 Intruder, and 921 Intrepid series Black Rock toy hauler trailer wheels. Alumina must start this recall campaign **IMMEDIATELY** or risk imposition of severe civil penalties.

On or about October 25, 2012, Alumina notified NHTSA that trailers it had manufactured with certain 908 Yuma, 910 Intruder, and 921 Intrepid series Black Rock toy hauler trailer wheels contain a safety defect. Alumina informed its decision was based on the defect decision of the wheel manufacturer, Carlisle Transportation Products (Carlisle) of which Alumina was notified.

NHTSA acknowledged receipt of your defect report on October 26, 2012, and, in so doing, reminded the company of its obligation to notify in writing its owners and purchasers, as well as its dealers and distributors, of safety defect in conformance with 49 CFR Part 577. Alumina was further directed to submit representative copies of its owner and dealer letters to NHTSA within five days of their mailing.

To date, we have not received any information to suggest Alumina has followed through on its obligation to conduct a safety recall of its safety defect. Alumina has not filed representative copies of its owner notification letter or its dealer notification letter. It has not notified the agency of when, if at all, it issued these notifications

The failures to conduct a safety recall, timely and properly notify owners and purchasers of a recalled product, and timely and properly notify dealers and distributors of that product, each constitute serious infractions of Federal law for which severe sanctions apply (is \$7,000 per violation, with a separate violation occurring for each trailer and/or

trailer wheel involved, and each failure to act as required, up to a maximum of \$17,250,000). In order to avoid these penalties Alumina must immediately issue the required notifications and then submit the representative copies. Please be reminded that before issuing any notifications, a draft of the letter you intend to send to owners and purchasers must be submitted to NHTSA for approval.

The draft notification letter, representative copies of the issued owner and dealer letters, and all other correspondence, may be submitted via email to RMD.ODI@dot.gov, or via facsimile to (202) 366-7882, Attention: Ms. Kelly Schuler.

In the event Alumina contends it notified its purchasers and dealers in some alternative manner (e.g., telephone call, e-mail notification) please so state and provide the date(s) of any such notifications and, where possible, provide a representative copy of that notification. The agency notes that these alternative notifications are not sufficient under Federal law, but may enhance the agency's understanding of what measures the company has attempted to notify owners and dealers and remedy its noncomplying lighting equipment.

Thank you for your attention and prompt response to this letter. Should you have questions or concerns, please contact Ms. Schuler on (202) 366-5227.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with the first name being the most prominent.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement