



A REVSTONE COMPANY

2129 Austin Drive
Rochester Hills, MI 48309

CERTIFIED MAIL
RETURN RECEIPT REQUESTED.

Recd 27/11/11
[Signature]

Mr. Richard C. Boyd, Acting Director
Office of Defects Investigation
National Highway Traffic Safety Administration

Re: NVS-214tb, PE10-048

Dear Mr. Boyd,

This letter together with its supporting documentation comprises Valley's response your request regarding the preliminary investigation based on customer complaint, VOQ 10368002.

The response is complete in the sense that all questions were addressed, however the answers to some questions remain unknown due to the fact we no longer have in our possession many of the documents as this product has been manufactured since 1989. Additionally, the company has changed ownership many times and new ownership has not retained all documents in the possession of previous owners.

Valley formally and respectfully invokes 5 U.S.C. 552(b)(4) and hereby requests protection from disclosure pursuant to 18 U.S.C. 1905 in accordance with 49 CFR Part 512, for information contained in Table's 1 and 2 within this submission. Valley submits two copies containing the confidential information and one redacted. These tables are the subject of part of the answers to questions #7 & #8.

The reason for requesting confidentiality is predicated on the exhaustive research, testing and data acquisition conducted over many years necessary to establish weight carrying and weight distributing loads from which all Valley products are subjected. Our competitors in the industry, having access to this information made public, would necessarily benefit at the expense of Valley's efforts.

If you have any questions regarding this submission, please contact me using any of the below options.

Sincerely,

Dan Stewart, Engineering Manager
REVSTONE INDUSTRIES, LLC
Valley Towing Products
2129 Austin Drive
Rochester Hills, MI 48309
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1. Identify the hitch assembly part number that Valley Towing Products uses to designate the hitch assembly that is the subject of VOQ 10368002.
 - A. Valley Identifies its product as 7823047.

2. Identify those hitch assemblies that are "essentially similar" (part of a logical product line family) to the hitch assembly identified in response to Request No. 1 above.
7800047, 7801047, 7802047, 7803047, 7804047, 7805047, 7807047, 7808047, 7810047, 7811047, 7820047, 7821047, 7822047, 7824047, 7825047, 7826047.

3. For each hitch assembly identified in response to Request Nos. 1 and 2, provide a table (#1) that identifies:
 - (a) the date of first production;

 - (b) the date of final production;

 - (c) the principle distinguishing features / characteristics / differences among the "subject components" and "essentially similar" component assemblies listed.

4. For each hitch assembly identified in response to Request Nos. 1 and 2, provide a table (#2) that identifies the total number (quantity) of hitch assemblies that Valley Towing has manufactured and sold for use in North America for installation in both (a) original equipment vehicles and (b) intended for after-market installations from start of production to date
 - (a) By hitch assembly part number;

 - (b) By year of sale;

 - (c) By purchaser (*).

5. Provide a representative engineering drawing or sketch that depicts the hitch assembly identified in response to Request No. 1. See tab "DWG"

6. Provide a table (#3) that provides the hitch assembly ratings for each of the hitch assemblies listed in response to Requests No.1 and 2 including, but not limited to:
 - (a) Maximum rating for horizontal load or force;

 - (b) Maximum rating for horizontal bending moment, if any (state the location of the centroid from which the maximum rated bending moment is calculated);

 - (c) Maximum rating for vertical load or force;

 - (d) Maximum rating for vertical bending moment, if any (state the location of the centroid from which the maximum bending moment is calculated);

 - (e) All other rating information including, but not limited to load or usage limitations, restrictions, instructions, and the like;

 - (f) A copy of all installation instructions, warnings, and stated usage limitations or parameters; see tab "warnings"

(g) All description of all maintenance instructions and usage parameters intended for guiding owner (or dealer-provided) maintenance, including, but not limited to, recommendations to visually inspect the hitch for indications of deterioration and the recommended frequency for the identified / listed maintenance or inspection action.

7. Provide a table that briefly describes the technical basis by which Valley established each of the ratings, installation, and maintenance parameters listed in response to Request No. 6. (See tabs "Engineering Docs" & "Ratings".)

8. Provide a copy of all engineering documentation (see tabs "Engineering Docs" & "ratings") including, but not limited to, calculations, engineering testing, and/or supplier technical data, that Valley has used to establish the ratings listed in response to Request No. 6.

9. State the number of each of the following, by vehicle model year and vehicle model, whether or not confirmed, received by Valley, or of which Valley is otherwise aware, received since January 1, 2005, which relate to, or may relate to, the alleged defect in the hitch assemblies identified in responses to Request Nos. 1 and 2: See tab "Claims".

(a) Consumer and field reports, including dealer field reports; None known.

(b) Reports involving an injury or a fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in the vehicle hitch assembly, property damage claims, consumer complaints, or field reports; None known.

(c) Property damage claims; None known.

(d) Third-party arbitration proceedings where Valley is, or was, a party to the arbitration; None known.

(e) Lawsuits, both pending and closed, in which Valley is, or was, a party; None known.

(f) Warranty claims, whether or not reimbursed, including requests for special policy adjustment, extended warranty, and/or other similar consumer considerations such as "good will" and/or any and all other reimbursement request programs. State the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple reports of the same incident are to be counted separately (i.e., a consumer complaint and a field report involving the same incident are to be counted as a field report and a consumer complaint, etc.). None known.

In addition, for items "c" through "e," provide a summary description of the alleged problem and causal and contributing factors and Valley's assessment of the problem, with a summary of the significant underlying facts and evidence. N/A

For item "e," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other documents initiating the action was filed. N/A

Provide the table in Microsoft Access or Excel 2003, or a compatible format, entitled "PE10-048, Request Number Nine - Complaint Summary." N/A

10. For each consumer complaint, warranty claim report, etc. identified in response to Request No. 9 above, received by Valley, or of which Valley is otherwise aware, received since January 1, 2005, whether or not confirmed, that alleges, or may reasonably be inferred to describe the alleged defect in hitches identified in responses to Request Nos. 1 and 2, identify:

- a. Valley's file number or other claim identifier used; 1777, 1803
 - b. The category of the incident as identified in response to Request No. 9 (i.e., consumer complaint, field report, etc.); warranty hitch, hitch install.
 - c. The owner's name; See "Claims" tab
 - d. The owner's address; Unknown
 - e. The owner's phone number; See "claims" tab
 - f. The incident date; See "claims" tab
 - g. The incident location; N/A
 - h. The report or claim date; See "claims" tab
 - i. The complete vehicle 17 digit VIN; N/A
 - j. The vehicle make; See "claims" tab
 - k. The vehicle model; See "claims" tab
 - l. The vehicle model year; N/A
 - m. A brief description of the incident, including the observed condition of the affected hitch assembly; See "Claims" tab
 - n. The hitch assembly part number; Not identified, but '07 Ithaca used 7823047 Hitch assy.
 - o. Whether the some or all of the hitch assembly components were examined by Valley representatives; N/A
 - p. A summary of the examination findings; N/A
 - q. Whether property damage is alleged; N/A
 - r. The number of alleged injuries, if any; None known
 - s. The number of alleged fatalities, if any. None known
11. Describe all modifications or changes made by, or on behalf of, Valley in the design, material composition, manufacture, quality control, supply, or installation of which relate to, or may relate to, the "alleged defect" in the "subject components." For each such modification or change, provide the following information: (See tab "Changes")
- (a) The date or approximate date on which the modification or change was incorporated into vehicle production; see "changes" tab
 - (b) A detailed description of the modification or change; see "changes" tab

(c) The reason(s) for the modification or change; see "changes" tab

(d) The part numbers (service and engineering) of the original component; see "changes" tab

(e) The part number (service and engineering) of the modified component; see "changes" tab

(f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when; If part number is advanced, old is superceded. Unless customer authorizes the sale of inventory, the product is withdrawn.

(g) When the modified component was made available as a service component; N/A and,

(h) Whether the modified component can be interchanged with earlier production components. In the case of the changes authorized on this hitch, the changes would permit interchangeability.

12. Describe all requested deviations from conformance to specifications received from all sources, the affected vehicle production, and provide a summary of the disposition for each of the requested deviations for the "subject components." See "analysis" tab.

13. Provide a list that identifies by VIN each of the following associated with reported hitch cracking / fracturing incidents:

(a) A description of the returned parts; no VIN known. See tab "claims"

(b) A copy of the inspection report / observations conducted by Valley, Valley's suppliers, and/or sub-contractors; None known.

(c) The current location of the retained returned components (if known). State if the inspected components have been scrapped. Never received sample.

14. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the "subject components" that have been conducted, are being conducted, are planned, or are being planned by, or for, Valley. For each such action, provide the following information: None existing or planned beyond what has been performed on the product made the basis for this investigation.

(a) Action title or identifier; None known

(b) The actual or planned start date; N/A

(c) The actual or expected end date; N/A

(d) The actual or expected end date; N/A

(e) Engineering group(s)/supplier(s) responsible for designing and for conducting the action; N/A

(f) A brief summary of the findings and/or conclusions resulting from the action. N/A

15. Furnish Valley's detailed opinion of the alleged defect in the "subject components." (See tab "analysis.") Include an assessment of the following:

(a) The causal or contributing factors;

(b) The failure mode;

(c) The risk to motor vehicle safety that it poses;

(d) What warnings, if any, are provided to the operator and other persons.

16. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the "subject components," that Valley has issued to any owners, dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Valley is planning to issue within the next 120 days. None known.

3. For each hitch assembly identified in response to Request Nos. 1 and 2, provide a table that identifies:

- (a) the date of first production;
- (b) the date of final production;
- (c) the principle distinguishing features / characteristics / differences among the "subject components" and "essentially similar" component assemblies listed.

7800047			
7801047			
7802047			
7803047			
7804047			
7805047			
7807047	3/1/1999	11/4/2004	E-Bracket Location
7808047			
7810047			
7811047			
7820047			
7821047			
7822047			
7824047	11/4/2004	Active	Same
7825047	3/1/1999	11/9/2004	E-Bracket Location
7826047	11/4/2004	Active	Same

All these products use the same 4119-02 welded assembly - the subject of the investigation. There are no differences on the hitch being used in these products except for the e-bracket identified above.