

ACRO Trailer Co.

2320 N. Packer Road • Springfield, Missouri 65803 • 417-862-1758 • FAX 417-862-8084 • www.acrotrailer.com

Manufacturers of Aluminum, Stainless Steel & Carbon Steel Trailers for the Liquid Transportation Industry

February 9, 2004

TO:

Associate Administrator for Enforcement,
National Highway Traffic Safety Administration
400 7th Street, SW., 5319
Washington, D.C. 20590

FROM:

Acro Trailer Company
2320 N. Packer Road
Springfield, MO 65803

SUBJECT:

579.5 Notices, bulletins, customer satisfaction campaigns, consumer advisories,
and other communications.

Dear Sir,

Following is a notice sent to Acro Trailer Company From Webb wheel Products
with letters that we sent to our customers

Sincerely



Darrell Smith
Sales and customer service



Acro Trailer Co
2320 N Packer Rd
Springfield, MO 65803

January 20, 2004

Dear Dale Doran:

The National Highway Traffic Safety Administration (NHTSA) has approved a voluntary recall of our Platinum Series Brake Drums. Our records indicate that your company purchased Platinum drums during the time period defined. We would appreciate your assistance in implementing this recall. Enclosed are the following documents:

- Recall Notice
- Vehicle Inspection Procedure
- Reimbursement for Inspecting
- Reimbursement for Removing and Replacing

Brake drum part numbers included in this recall:

- 60528B
- 60545B
- 60672B
- 60864B
- 60875B
- 60893B
- 60895B

Please check your inventory for any affected drums. If you have any drums in the suspect date range, please follow the instructions in the enclosed Recall Notice document. In the event no affected drums are found, please respond to that effect to aid us in tracking progress. In addition, you should compile a list of your customers who have purchased product that may be affected by this recall and notify those customers regarding this issue and the required corrective action. Please notify us of any customer locations to whom you want us to send the inspection instructions.

The safety and integrity of our product is important to us. That is why we are issuing this voluntary recall of our Platinum Series Brake Drums. If you have any questions or need additional information, please call us at 1-800-633-3256. The recall number for NHTSA is 04E-002.

Sincerely,

Kent Finkbiner
Director of Marketing and OEM Sales



Webb Wheel Products, Inc. • 2310 Industrial Drive, S.W. • Cullman, Alabama 35055

**SAFETY RECALL NOTICE TO VEHICLE MANUFACTURERS
JANUARY 2004**

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act:

Reasons for this recall:

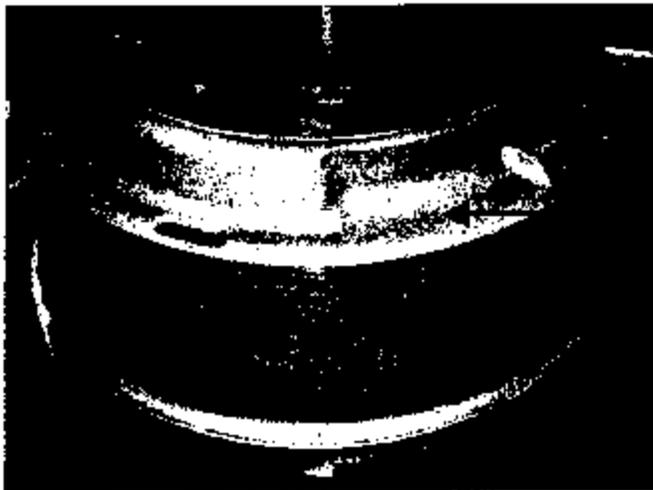
Webb Wheel Products, Inc., has decided that a defect which relates to motor vehicle safety exists in its "Platinum Series" brake drums. This decision was based on a higher than expected warranty return rate suggesting the potential for increased brake drum failure with these drums.

The consequence of this can cause:

1. Premature cracking of the braking surface resulting in the following:
 - a. Reduction or complete loss of braking on that wheel end.
 - b. Loss of brake drum pieces resulting in further damage.
2. Excessive runout of the braking surface causing cam rollover resulting in the loss of braking on that wheel end.

"Platinum Series" brake drum cast date codes covered in this recall:

Cast date codes from 017-01 to 273-02 (Julian style date) are covered in this recall. Reference Figures 1 & 2 for cast date location.





What you should do:

1. You should inspect your inventory for "Platinum Series" brake drums with suspect cast date codes as described above. Drums found in inventory with cast date codes covered in this recall should be returned to Webb immediately on a Return Goods Order. For return instructions call:

Christy Rusk
(256) 739-6660 - Office
(256) 775-7540 - Direct
(800) 633-3256 - Toll Free
crusk@webbwheel.com

2. You should compile a list of vehicles that could be affected by this recall and notify the owners of these vehicles regarding this issue and the required corrective action. Contact us regarding the locations to which you want us to send the inspection instructions.
3. A notification has been sent to the National Highway Traffic Safety Administration regarding this recall.

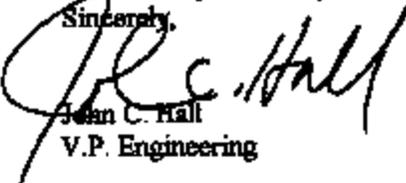
What we will do:

1. Webb Wheel will supply inspection instructions (See inspection procedure).
2. Webb Wheel will pay for inspection of the vehicles. We will pay .15 hours, at your shop rate, per drum for the inspection.
3. Webb Wheel will pay for the removal of the "Platinum Series" drums. We will pay .25 hours, at your shop rate, per drum for removal. This includes removal of the disc wheel(s).
4. Webb Wheel will pay for reinstallation of the "Platinum Series" drums if they are acceptable for further use, or the installation of new replacement drums. We will pay .25 hours, at your shop rate, per drum for installation. This includes all maintenance required to reinstall the brake drum and disc wheel(s).
5. Where vehicles have "Platinum Series" drums that are not acceptable for reuse, we will pay a one time allowance of \$105.00 (freight allowance included) per brake drum for the purchase of a replacement brake drum.

If your vehicles are not inspected and repaired within a reasonable time, please contact Webb Wheel Products, Inc., at 2310 Industrial Drive SW, Cullman, AL 35055 or call us at 800-633-3256. You may also submit a complaint to the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street SW, Washington, DC 20590 or call toll free the Auto Safety Hotline at 888-327-4236.

We are sorry to cause you this inconvenience and appreciate your cooperation.

Sincerely,


Jean C. Hall
V.P. Engineering



January 7, 2004
Page 1

VEHICLE INSPECTION PROCEDURE

The following procedure should be used to check vehicles that are equipped with "Platinum Series" brake drums:

STEP 1. Check Vehicle.

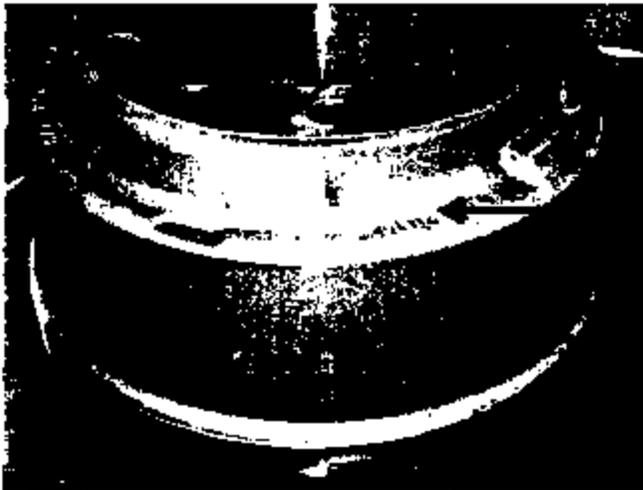
Check the vehicle to verify that it has (1) or more "Platinum Series" brake drums installed. Locate and record the vehicle VIN number (see attached form(s) and photo). If the vehicle does not have any "Platinum Series" brake drums on it, the vehicle can be returned to service after placing a blue dot (sticker) on the VIN number plate.

STEP 2. Check cast date code.

If the vehicle contains (1) or more "Platinum Series" brake drums, check the cast date code on each drum to determine if it is one of the cast date codes covered in this recall.

"Platinum Series" brake drum cast date codes covered in this recall:

Cast date codes from 017-01 to 273-02 (Julian style date) are covered in this recall. Reference Figures 1 & 2 for cast date location.



If the "Platinum Series" brake drum is not one of the cast date codes covered in this recall, then the vehicle can be returned to service after placing a blue dot (sticker) on the VIN number plate.

If the "Platinum Series" brake drum is one of the cast date codes covered in this recall, then STEP 3.



STEP 3. If the vehicle contains (1) or more "Platinum Series" brake drums, remove and check each drum as follows:

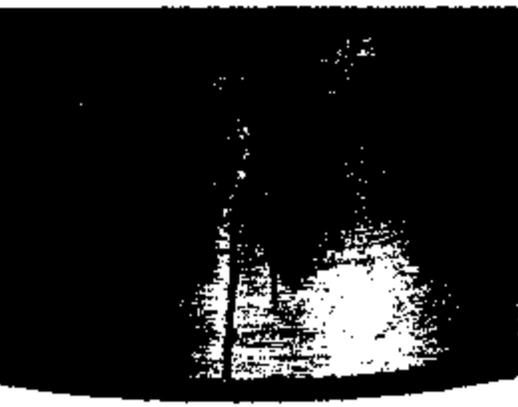
Clean and inspect each "Platinum Series" brake drum . To be suitable for further service, the brake drum should pass the following checks.

- a. The brake surface should be free of excessive heat checks (medium & heavy heat checks) (see page 3).**
- b. The brake surfaces should be free of cracks (see page 3).**

If the brake drum(s) is (are) free of excessive heat checks or cracks, the vehicle can be returned to service after placing a blue dot (sticker) on the VIN number plate.

If any of the above conditions are not met, the brake drum should be replaced before returning the vehicle to service after placing a blue dot (sticker) on the VIN number plate. Failure to replace the brake drum will result in an unreliable braking system. Do not turn or resurface the braking surface. Adhere to all proper maintenance practices and procedures during the inspection.

BRAKE SURFACE CONDITION

EXAMPLE	PROBLEM	SOLUTION
	Light Heat Checks	Does not impair brake performance. Return brake drum to service.
	Medium Heat Checks	Replace brake drum.
	Heavy Heat Checks	Replace brake drum.
	Cracked Brake Drums	Replace brake drum.

MFD

"Blue Dot" (sticker) placed on VIN number plate.

DATE MFD.

GWWR

KG

LBS.

GAWR

AXLES

KG

LBS. EACH WITH

TIRES

RIMS

COLD DUAL PRESSURE

KPa(P.S.I.)

THIS VEHICLE CONFORMS TO ALL APPLICABLE U.S.A. FEDERAL MOTOR VEHICLE SAFETY STANDARDS IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE

VIN

VEHICLE TYPE TRAILER

COUPLER HEIGHT

INCHES

OVERALL WIDTH

INCHES

MFD UNDER ONE OR MORE OF THE FOLLOWING U.S. PATENTS: 4,165,526; 4,211,411; 4,230,335; 4,549,793; 4,258,926; 4,056,381; 4,266,820; 4,641,640; 4,857,407; 5,028,163; 5,034,843; 5,058,756; 5,170,606 OTHER PATENTS PENDING

OVERALL HEIGHT

FT.

INCHES



**REIMBURSEMENT FOR INSPECTING "PLATINUM SERIES"
BRAKE DRUMS ON VEHICLES**

To obtain a reimbursement for checking non-defective drums on vehicles, contact Christy Rusk Amy Williamson at 1-800-633-3256 or fax to 256-739-6246 for any questions regarding this policy.

1. MAKE OF VEHICLE _____ YEAR _____
2. VEHICLE VIN # _____
3. MILEAGE _____
4. PART NUMBER OF "PLATINUM SERIES" BRAKE DRUM _____
5. CAST DATE CODES _____
6. VEHICLE OWNER'S NAME _____
7. REPAIR LOCATION OR DEALER NAME _____
8. PHONE NUMBER / FAX NUMBER _____

To demonstrate the work has been completed, the above information must be returned to Webb along with the documentation of the work order. Webb will reimburse you for up to .65 hours maximum labor per drum at your current shop labor rates. This includes all the maintenance required to remove the disc wheel(s) and the brake drum, inspect the brake drum, and reinstall the brake drum and disc wheel(s) using proper maintenance procedures.



**REIMBURSEMENT FOR REMOVING AND REPLACING "PLATINUM SERIES"
BRAKE DRUMS ON VEHICLES**

To obtain a reimbursement for removing and replacing drums on vehicles, contact Christy Rusk or Amy Williamson at 1-800-633-3256 or fax to 256-739-6246 for any questions regarding this policy.

1. MAKE OF VEHICLE _____ YEAR _____

2. VEHICLE VIN # _____

3. MILEAGE _____

4. PART NUMBER OF "PLATINUM SERIES" BRAKE DRUM _____

5. CAST DATE CODES _____

6. VEHICLE OWNER'S NAME _____

7. REPAIR LOCATION OR DEALER NAME _____

8. PHONE NUMBER / FAX NUMBER _____

9. RETURN AUTHORIZATION NUMBER _____

- Webb will give you a return authorization number for the "Platinum Series" brake drums being replaced.
- The owner or dealer should replace the "Platinum Series" brake drums per the Vehicle Inspection Procedure dated 1/7/04 and return them to Webb within 60 days freight collect by Overnight.
- To demonstrate the work has been completed, the "Platinum Series" brake drum(s) must be returned to Webb and the above information must be returned to Webb along with the documentation of the work order. Webb will reimburse you for up to .65 hours maximum labor per drum at your current shop labor rates. This includes all the maintenance required to remove the disc wheel(s) and the brake drum, inspect the brake drum, and reinstall the brake drum and disc wheel(s) using proper maintenance procedures. A one time allowance of \$105.00 (freight allowance included) per brake drum will be reimbursed for the purchase of a replacement brake drum.

**ACKNOWLEDGMENT FAX SHEET OF RECEIPT OF DEFECT
INFORMATION REPORT SUBMITTED UNDER 49 CFR PART 573**

Assigned Recall No. 04V-054 by the
National Highway Traffic Safety Administration

Part 573 Report Date: February 4, 2004

DATE FAXED: February 7, 2004

MANUFACTURER: Aero Trailer Company

MANUFACTURER CONTACT: Mr. Wayne Rodrick
General Manager
Mr. Chuck Beezley
Chief Engineer

FAX: 417-862-8084

SUBJECT: 10 Aero 2002-2003 ACJ9 trailers equipped with Webb Wheel Platinum Series brake drums. These brake drums could experience premature crack of the braking surface resulting in reduction or complete loss of braking on that wheel and or loss of brake drum pieces. Loss of braking ability could result in a vehicle crash, possibly causing injuries or death.

This is an acknowledgement for this recall. A formal acknowledgement letter will be written ONLY if we have additional comments or concerns.

As stated in your report Webb Wheel (04E-002) will be conducting the owner notification and remedy for this recall.

Please provide us with the beginning and ending dates of manufacture for these vehicles.

If you have any questions, please call:



Judith Taylor, Safety Recall Analyst on (202) 366-9525
or George Person, Chief, on (202) 366-5210
or by FAX (202) 366-7882
or e-mail at Judy.Taylor@nhtsa.dot.gov
Recall Management Division

1-25-02 thru 2-12-03

National Highway Traffic Safety Administration
OFFICE OF DEFECTS INVESTIGATION

400 7th Street, S.W. NSA-11
Washington, DC 20390
FAX: (202) 366-7882

To: Mr. Wayne Roderick
Company: Acro Trailer Company
FAX #: 417-862-8084

From: George H. Person, Chief
Recall Management Division
Telephone: (202) 366-5210

EQ04-002

Safety Recall Follow-up Report

Date: FEB 8 - 83

The Office of Defects Investigation (ODI) is conducting a review of safety recall 04E-002, being performed by Webb Wheel Products, Inc. (Webb Wheel). This recall involves "Platinum Series" brake drums. One potential cause of the defect is the non-homogeneous metallurgical structure of the platinum drum that sets up detrimental residual stresses, poorer thermal conductivity, or both, in the drum. At the present time Webb Wheel does not know the cause of the problem. However, this condition can lead to premature cracking of the braking surfaces and excessive run out of the braking surface causing cam rollover.

According to information provided by Webb Wheel, Acro Trailer Company, (Acro) was identified as a motor vehicle manufacturer who purchased and/or was supplied recalled Platinum Series brake drum assembly and should have been notified by Webb Wheel of the safety recall. The purpose of this request is to ascertain the disposition of the recalled Platinum Series brake drum assemblies that were acquired by Acro and identify any motor vehicle that may contain this equipment.

Federal Regulation 49 CFR Part 573, "Defect and Noncompliance Reports," requires that a manufacturer provide the agency with a safety defect information report within 5 days after deciding that a safety defect exists in its motor vehicles and item of equipment. Part 573.3(f) states that "In the case of a defect or noncompliance decided to exist in original equipment installed in the vehicles of more than one manufacturer, compliance with Part 573.5 is required of the equipment manufacturer as to the equipment items, and of each vehicle manufacturer as to the vehicles in which the equipment has been installed". Accordingly, Acro may be required to file a Defect Report. As of this date, we have not received notification of the described defect from Acro.

If Acro does not agree with the decision made by Webb Wheel that the recalled Platinum Series brake drum assemblies contain a safety defect and cannot provide an explanation for Acro's position. If Acro has not received any of these recalled Platinum Series brake drum assemblies, please so state. If Acro is not a vehicle manufacturer, please state the nature of its business and its relationship with Webb Wheel.

It is important that Acro respond to this follow-up report on time. A Safety Defect and Noncompliance Report Guide for vehicles is enclosed to assist you. Your failure to respond promptly and fully to this letter could subject Acro to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief.

Your response, in writing or by FAX, is to be submitted to this office by February 12, 2004, referencing EQ04-002. If you have any questions, please contact Mrs. Barbara E. Cooke at (202) 366-6098.

Enclosure



046-002 1/18

January 8, 2004

Ms. Kathleen DeMeter
Director of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
400 Seventh Street SW
Washington, DC 20590

RECEIVED
NHTSA-210
JAN 9 2 11 PM '04

Dear Ms. DeMeter:

Enclosed please find the original document of the Part 573 Defect and Noncompliance Report notification that was submitted January 7, 2004.

If you have any questions please call.

Sincerely,

John C. Hall
VP Engineering
256-775-7507 - direct
256-739-6660 - office
jhall@webbwheel.com

cc: Ken Dickson
John Lemker

Form Approved: O.M.B. No. 2127-9004

Safety Defect and Noncompliance Report Guide for Equipment

PART 573 Defect and Noncompliance Report⁽¹⁾

In January 7, 2004, Webb Wheel Products, Inc. [MFR] decided that (a defect which relates to motor vehicle safety) (a noncompliance with Federal Motor Vehicle Safety Standard No. _____) exists in terms of motor vehicle equipment listed below, as lots of its "Platinum Series" brake drums were experiencing premature cracking. No cause has been identified and our investigation continues. However, since we believe the cracking suggests there is a potential for brake drum failure, Webb Wheel has decided to conduct a remedial program although no final determination of a defect which would cause the failure has been identified and Webb Wheel 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:

Furnish the manufacturer's identification codes for this recall (if applicable):

Identify the full corporate name of the manufacturing 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.

Webb Wheel Products, Inc.
310 Industrial Drive S.W
Cullman, AL 35055

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

John C. Hall
V.P. Engineering

Telephone Number: (256) 775-7507 Fax Number: (256) 739-6660

Name and Title of Person who prepared this report.

John C. Hall
V.P. Engineering

Signed:

I. Identify the Recalled Items of Equipment

1. 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: "Platinum Series" brake drum

Make: All **Model:** Class 6-8 truck/tractors and truck trailers.

Part Number: 60528B **Size:** 15" X 4"

Function: Converts kinetic energy to heat energy. Provides friction surface for brake surface linings. Transmits braking torque to hub or spoke wheel.

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: All **Model:** Class 6-8 truck/tractors and truck trailers.

Part Number: 60545B **Size:** 15" X 4"

Function: Converts kinetic energy to heat energy. Provides friction surface for brake surface linings. Transmits braking torque to hub or spoke wheel.

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: All **Model:** Class 6-8 truck/tractors and truck trailers.

Part Number: 60672B **Size:** 16.5" X 7"

Function: Converts kinetic energy to heat energy. Provides friction surface for brake surface linings. Transmits braking torque to hub or spoke wheel.

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: All **Model:** Class 6-8 truck/tractors and truck trailers.

Part Number: 60864B **Size:** 16.5" X 7"

Function: Converts kinetic energy to heat energy. Provides friction surface for brake surface linings. Transmits braking torque to hub or spoke wheel.

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: All **Model:** Class 6-8 truck/tractors & truck trailers.

Part Number: 60875B **Size:** 16.5" X 7"

Function: Converts kinetic energy to heat energy. Provides friction surface for brake surface linings. Transmits braking torque to hub or spoke wheel.

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: All **Model:** Class 6-8 truck/tractors & truck trailers.

Part Number: 60893B **Size:** 16.5" X 7"

Function: Converts kinetic energy to heat energy. Provides friction surface for brake surface linings. Transmits braking torque to hub or spoke wheel.

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: All **Model:** Class 6-8 truck/tractors & truck trailers.

Part Number: 60895B **Size:** 16.5" X 7"

Function: Converts kinetic energy to heat energy. Provides friction surface for brake surface linings. Transmits braking torque to hub or spoke wheel.

Other information which characterizes/distinguishes the items of equipment to be recalled:

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 August 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

The starting and ending dates of manufacture for this recall were determined by the total population of aluminum drum castings produced from January 1, 2001 through September 30, 2002.

II. Identifying the Recall Population

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

Number of Items:

The total number of drums potentially covered by this recall is 63,655.

Model Year Potentially Involved

Total Number Potentially Affected by the Recall:

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

The approximate percentage of the total number of drums, based on warranty claims, estimated to be subject to this recall is 10% or 6,356 drums.

Identify and describe how the recall population was determined—in particular how the recalled models were selected and the basis for the start and final dates of manufacture of the recalled items of equipment:

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.

The reason for the higher number of warranty claims is still under investigation. One potential cause is the non-homogenous metallurgical structure of the cast iron drum which sets up detrimental residual stresses, or poorer thermal conductivity, or both. In the interim,

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

We don't know what the cause is at this time.

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

The condition can lead to:

- 1) Premature cracking of the braking surface resulting in the following:
 - a. Reduction or complete loss of braking on that wheel end.
 - b. Loss of brake drum piece resulting in further damage.
- 2) Excessive runout of the braking surface causing cam rollover resulting in the loss of braking on that wheel end.

Identify any warning which can (a) precede, (b) occur.

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

ThyssenKrupp Waupaca, Inc.

Tower Road PO Box 249
Waupaca, WI 54981

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

Jary Thoe
President, CEO

IV. Provide the Chronology ^{NOT} Determining the Defect/Noncompliance

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

i. With respect to a defect, furnish a chronological summary (including dates) of all the principal events that were the basis for the determining of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

1) Reports:

a. Chronological Events:

February 6, 2003 - Comparison of Gray Iron verses Platinum Drum Warranty

Gray Iron .00074 x 100% = .0740% } Approximately the same
Platinum .000973 x 100% = .0973% }

April 9, 2003

Trailer Fire - WC #18503 authorized 4/24/03.

Drum worn beyond maximum discard diameter.

Picture 4/1/03

Investigated Puller's trailer fire - sent in one of our salesman whose judgment was that it wasn't the drum that caused the fire.

Material checked gross

90-95% CGI, 85-90% Pearlite

May 13, 2003

Field investigations started earliest 4/28/03.

May 22, 2003

Comparison of Gray Iron versus Platinum Drum Warranty

Gray Iron .00045 x 100% = .0450% } Platinum warranty 15+ times Gray
Platinum .00703 x 100% = .703% } Iron Warranty

June 10, 2003

Great Dane Report #1

Date of Report: 6/10/03

From June 13, 2003 through November 2003, an intensive investigation was conducted including field visits, inspections of brake drums and extensive product examination and testing. A copy of the failure investigation report prepared by Southern Research Institute was submitted to NHTSA on November 12, 2003. This is the most comprehensive document prepared on the brake drum cracking.

2) Accidents:

1. Great Dane Trailer Fire -
Warranty Claim (WC # 1553)
Dated 4/9/03

3) Injuries: None

4) Fatalities: None

5) Warranty Claims:

a. Number of warranty claims per year:

- i. 2001 = (3)
- ii. 2002 = (21)
- iii. 2003 = (94)

1. 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.
Not applicable.

V. Identify the Remedy

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

Webb Wheel Products, Inc., will initiate a voluntary vehicle manufacturer notification and inspection of 63,655 "Platinum Series" brake drums made between January 17, 2001 and September 30, 2002. These drums which fail inspection will be replaced.

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

3. 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.

Production was stopped on July 17, 2003, and has not been resumed.

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.

All mailings will be completed within 30 working days of approval of the notification letters.

VII. Furnish Recall Communications

3. 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.*

Attached are draft copies of all notices, bulletins, and other communications that relate directly to this recall.

Note: These documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

A copy of all notices, bulletins, and other communications will be sent to the vehicle manufacturers and parts distributor centers that purchased these "Platinum Series" brake drums.

¹ Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5226 or by FAX at (202) 366-7882.

The Privacy Act of 1974 - Public Law 93-579, As Amended: This information is requested pursuant to the authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or statistical summary thereof, may be used in support of the agency's action.

Fax

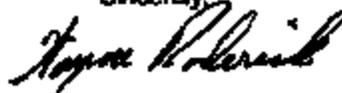
To: George H. Person	From: WAYNE RODERICK
Fax: 202/366-7882	Pages: 16
Phone:	Date: 02/05/04
Re: Webb Safety Recall	CC:

Urgent For Review Please Comment Please Reply Please Recycle

Dear Mr. Person,

Following is a safety defect report concerning Webb's Platinum Series brake drum. If additional information is needed, please let me know.

Sincerely,



Wayne Roderick

General Manager

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On 01/29/04, 2004, ACEO TRAILER CO [MFR] decided that (a defect which relates to motor vehicle safety) (a noncompliance with Federal Motor Vehicle Safety Standard No.) exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: 2-4-04

Furnish the manufacturer's identification code for this recall (if applicable): ER04-002

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 C.F.R. §30164.

ACEO TRAILER CO.
2320 N. PACKER RD
SPRINGFIELD, MO
65803

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

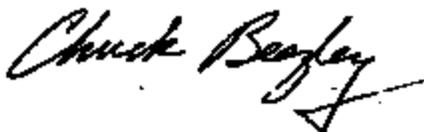
CHUCK BEEZLEY
CHIEF ENGINEER

Telephone Number: 417-862-1758 Fax No.: 417-862-8084

Name and Title of Person who prepared this report.

CHUCK BEEZLEY
CHIEF ENGINEER

Signed:



¹ Each manufacturer must furnish a report to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information presently requested. Any questions, please consult the complete Part 573 or contact Mr. George H. [redacted] at (202) 366-5210 or by FAX at (202) 366-7882.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): Model Year(s) Involved: 2002 Model(s):

Production Dates: Beginning: Ending:

VIN Range: Beginning: 2-5042 Ending: 2-5043

Vehicle Type: CTMV Bodystyle:

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): Model Year(s) Involved: 2002 Model(s):

Production Dates: Beginning: Ending:

VIN Range: Beginning: 2-5062 Ending: 2-5064

Vehicle Type: CTMV Bodystyle:

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): Model Year(s) Involved: 2003 Model(s):

Production Dates: Beginning: Ending:

VIN Range: Beginning: 3-5108 Ending: 3-5009

Vehicle Type: CTMV Bodystyle:

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

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.

II. Identify the Recall Population

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

Vehicles Model	Year	Number of Potentially Involved
5	2002	
5	2003	

Total Number Potentially Affected by the Recall: 10

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

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 vehicles

THESE WERE ONLY CTMV'S SPEC'D.
WITH BRAKE DIAMETERS THAT FALL IN
THIS RECALL. PARAMETER 5.

III. Describe the Defect or Noncompliance

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

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

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

Identify any warning which can (a) precede or (b) occur.

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

WEBB WHEEL PRODUCTS

2310 INDUSTRIAL DRIVE S.W.

CULLMAN, AL 35055

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

JOHN C. HALL

VP ENGINEERING

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.

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.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in accordance with the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

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

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

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.

VI. Identify the Recall Schedule

10. 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.

VII. Furnish Recall Communications

11. **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 (302-366-7882) for review prior to mailing.**

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

1/30/04

Mr. Kent Finkbiner
Webb Wheel Products, Inc.
2310 Industrial Drive S.W.
Cullman, AL 35055

Ref: Voluntary recall of Platinum Hubs

Dear Mr. Finkbiner,

We have determined that the following customers have Platinum drums that were originally installed on their trailers that fall under the recall.

1. Martin Industrial Pumping Services, Inc. *8056 (3-5037)*
20609 Placerita Canyon Road
Santa Clara, CA 91321
- ✓ 2. Doyle Sims & Son's *8011-13 (2-5042, 2-5043, & 2-5044)*
P.O. Box 112
Gleason, TN 38229
- 3. Clark Sholts *8025-26 (3-5008 & 3-5009)*
Nestle Purina PetCare
800 North Brand Blvd.
Glendale, CA 91203
- ✓ 4. Leaser TX, Inc. *7998 & 7999 (2-5042 & 2-5043)*
6985 County Road 326
Palmayra, MO 63461
~~8000-8007~~
- ✓ 5. David Calderwood *8028-29 (3-5015 & 3-5016)*
MP Environmental Services
3400 Manor Street
Bakersfield, CA 93308

Please send a copy of your recall and inspection instructions to the above locations.

Please advise if you have any questions or if we can be of further service.

Yours truly,

Chuck Beezley
Chief Engineer

ACRO Trailer Co.

2320 N. Packer Road • Springfield, Missouri 65803 • 417-862-1758 • 800-589-5254 • FAX 417-862-8084 • www.acrotrailer.com

Manufacturers of Aluminum, Stainless Steel & Carbon Steel Trailers for the Liquid Transportation Industry

1/29/04

Mr. Tom Martin
Martin Industrial Pumping Services, Inc.
20609 Placerita Canyon Road
Santa Clara, CA 91321

Ref: Voluntary recall of Platinum Hubs

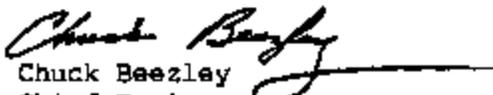
Dear Mr. Martin,

We have been notified by Webb Wheel Products of a voluntary recall on their Platinum Series hubs. A copy is enclosed for your reference.

Our records indicate that trailers we built for you had the recalled hubs on them at the time of manufacture.

Please contact Webb as indicated. We have notified Webb that you have trailers falling under this recall.

Yours truly,


Chuck Beezley
Chief Engineer

ACRO Trailer Co.

2320 N. Packer Road • Springfield, Missouri 65803 • 417-862-1758 • 800-589-5254 • FAX 417-862-8084 • www.acrotrailer.com

Manufacturers of Aluminum, Stainless Steel & Carbon Steel Trailers for the Liquid Transportation Industry

1/29/04

Mr. Doyle Sims
Doyle Sims & Son's
P.O. Box 112
Gleason, TN 38229

Ref: Voluntary recall of Platinum Hubs

Dear Mr. Sims,

We have been notified by Webb Wheel Products of a voluntary recall on their Platinum Series hubs. A copy is enclosed for your reference.

Our records indicate that trailers we built for you had the recalled hubs on them at the time of manufacture.

Please contact Webb as indicated. We have notified Webb that you have trailers falling under this recall.

Yours truly,



Chuck Beezley
Chief Engineer

ACRO Trailer Co.

2320 N. Packer Road • Springfield, Missouri 65803 • 417-862-1758 • 800-589-5254 • FAX 417-862-8084 • www.acrotrailer.com

Manufacturers of Aluminum, Stainless Steel & Carbon Steel Trailers for the Liquid Transportation Industry

1/29/04

Mr. David Calderwood
M.P. Environmental Services
3400 Manor Street
Bakersfield, CA 93308

Ref: Voluntary recall of Platinum Hubs

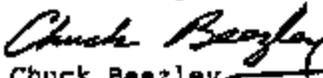
Dear Mr. Calderwood,

We have been notified by Webb Wheel Products of a voluntary recall on their Platinum Series hubs. A copy is enclosed for your reference.

Our records indicate that trailers we built for you had the recalled hubs on them at the time of manufacture.

Please contact Webb as indicated. We have notified Webb that you have trailers falling under this recall.

Yours truly,


Chuck Beezley
Chief Engineer

ACRO Trailer Co.

2320 N. Packer Road • Springfield, Missouri 65803 • 417-862-1758 • 800-589-3254 • FAX 417-862-8094 • www.acrotrailer.com

Manufacturers of Aluminum, Stainless Steel & Carbon Steel Trailers for the Liquid Transportation Industry

1/29/04

Mr. Clark Sholts
Nestle Purina PetCare
800 North Brand Blvd.
Glendale, CA 91203

Ref: Voluntary recall of Platinum Hubs

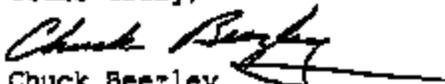
Dear Mr. Sholts,

We have been notified by Webb Wheel Products of a voluntary recall on their Platinum Series hubs. A copy is enclosed for your reference.

Our records indicate that trailers we built for you had the recalled hubs on them at the time of manufacture.

Please contact Webb as indicated. We have notified Webb that you have trailers falling under this recall.

Yours truly,


Chuck Beezley
Chief Engineer

ACRO Trailer Co.

2320 N. Pucker Road • Springfield, Missouri 65803 • 417-862-1758 • 800-589-5254 • FAX 417-862-8084 • www.acrotrailer.com

Manufacturers of Aluminum, Stainless Steel & Carbon Steel Trailers for the Liquid Transportation Industry

1/29/04

Ms. Patty Childress
Leaser TX, Inc.
6985 County Road 326
Palmyra, MO 63461

Ref: Voluntary recall of Platinum Hubs

Dear Ms. Childress,

We have been notified by Webb Wheel Products of a voluntary recall on their Platinum Series hubs. A copy is enclosed for your reference.

Our records indicate that trailers we built for you had the recalled hubs on them at the time of manufacture.

Please contact Webb as indicated. We have notified Webb that you have trailers falling under this recall.

Yours truly,


Chuck Beezley
Chief Engineer