



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

MAR 23 2004

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Leonard Barkan  
Strick Corporation  
225 Lincoln Highway  
Fairless Hills, PA 19030-0009

NVS-214njs  
EA03-022

Dear Mr. Barkan:

This letter represents the second request for information by the Office of Defects Investigation's (ODI) of the National Highway Traffic Safety Administration (NHTSA). After reviewing Strick's January 24, 2004 response to the EAIR, ODI requires additional information for its investigation concerning the greased wheel-end failures of Strick Trailers.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** All MY 1997 – 2004 Strick semi-trailers manufactured for sale or lease in the United States and equipped with greased wheel-end units.
- **Subject component:** Wheel-end unit including all parts and lubricants.
- **Manufacturer:** Strick Corporation (Strick), all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Strick including all business units and persons previously referred to), who are or, in or after 1996. Communications to, from or intended for zone representatives, fleets, dealers, suppliers of any component, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect:** Any failure, malfunction, or otherwise unsatisfactory performance involving greased wheel-ends on a Strick trailer involving a thermal event, severe overheating, fire at the wheel-end of the axle (wheel-end), or a partial or complete wheel separation.



DOT AUTO SAFETY HOTLINE  
888-DASH-2-DOT  
888-327-4236

- **Grease type:** "Grease type" means the product name of the grease used by Strick to lubricate the wheel-end when the trailer was built; the manufacturer's name of the grease used by Strick to lubricate the wheel-end; and the identification number of the grease.
- **Wheel-End Lubrication Fill Criteria:** "Wheel-End Lubrication Fill Criteria" means the amount of grease and/or lubrication, in pints, installed in a single wheel-end unit by Strick.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Strick, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document, which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.

In order for my staff to further evaluate the alleged defect, additional information from Strick is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Strick has previously provided a document to ODI, Strick may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner

that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Strick's response to each request, identify the source of the information and indicate the last date the information was gathered. If you have any questions concerning how to answer a question, please call Nate Seymour at (202) 366-6965. If you cannot answer a question due to lack of records, please provide a detailed explanation stating why there are no records, the date when the records were either destroyed or lost, and the identity of the source (this includes individual's name, title, company, and telephone number) Strick contacted in their attempt to obtain the required information.

1. For each Strick trailer that was sold to Estes Express, and referred to in invoice #775762 dated September 6, 2000 (Attachment #1, Estes Warranty Invoice), identify each such trailer by:
  - a. The Vehicle Identification Number (VIN);
  - b. Model name of the trailer;
  - c. Build date of the trailer;
  - d. Name or location of the manufacturing plant that built the trailer;
  - e. Type of grease used by Strick in lubricating the wheel-end hub units;
  - f. The Wheel-End Lubrication Fill Criteria for each wheel-end unit; and
  - g. Type and brand of wheel-end hub unit used in the trailer assembly.

Provide this information for each such trailer in Microsoft Excel 2000, or a compatible format, entitled "Trailers Sold to Estes Express." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

2. For each Strick trailer built in the same time period as the ones sold to Estes Express (referred to in Attachment #1, Estes Warranty Invoice), but sold to other purchasers and/or Fleets, identify each such trailer by:
  - a. VIN;
  - b. Model name of the trailer;
  - c. Build date of the trailer;
  - d. Name of the Purchaser or Purchasing Fleet (and Fleet contact person), address and telephone number;
  - e. Name or location of the manufacturing plant that built the trailer;
  - f. Type and brand of grease used by Strick in lubricating the wheel-end hub units;
  - g. The Wheel-End Lubrication Fill Criteria for each wheel-end unit; and
  - h. Type and brand of hub unit used in the trailer.

Provide this information in Microsoft Excel 2000, or a compatible format, entitled "Trailers Built A." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

We recommend 90-weight gear oil for wheel-end lubrication, which is the Strick standard and has been for many years. In view of the growing evidence that Mobilith SHC 007 will not meet our customer's expectations, if you wish us to continue to use this product, or other synthetic lubricants, on new production we will need written direction from you as to how much lubrication to install. We do not want to hold ourselves out as experts."

Explain why Strick continues to use Mobilith SHC 007 grease for its wheel-ends after finding that the grease will not meet its customer's expectations. What changes have you implemented to prevent failures, which in the past resulted in wheel separations and wheel-end fires?

9. Transport America purchased 255 trailers (Strick's order number 20MO6926B) from Strick. Strick built these trailers during the period of April 1999 to June 1999. State the wheel-end lubrication and the lubrication fill criteria used by Strick used to lubricate the individual wheel-end units of those trailers. How does it differ from the Estes trailers included in invoice #775762?
10. When the Estes invoice #775762 was paid, were other owners of trailers built in that same time era notified of a possible low fill condition, that could result in a premature failure, possibly resulting in a wheel separation or a wheel-end fire?
11. Provide a dated copy of Strick's record retention policy relative to warranty, customer/fleet complaints, product/process testing, plant production, plant maintenance, and production materials.
12. Provide Strick's assessment of the alleged defect (i.e., wheel separations, wheel-end unit fires), including:
  - a. the causal or contributory factor(s);
  - b. the failure mechanism(s);
  - c. the failure mode(s);
  - d. the risk to motor vehicle safety that it poses;
  - e. what warning sign(s), if any, would the operator of a subject vehicle have; and
  - f. what warning sign(s), if any, would other vehicles, when operating in the vicinity of a subject vehicle, have when the wheel-end unit of the subject vehicle was about to fail?

This letter is being sent to Strick pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Strick's failure to respond promptly and fully to this letter could subject Strick to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the

TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond to ODI information requests.

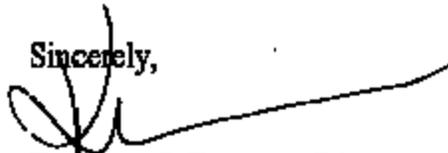
If Strick cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Strick does not submit one or more requested documents or items of information in response to this information request, Strick must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Strick's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **May 14, 2004**. Please refer to EA03-022 in Strick's response to this letter. If Strick finds that it is unable to provide all of the information requested within the time allotted, Strick must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Strick is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Strick then has available, even if an extension has been granted.

If Strick claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Strick must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Strick is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Nate Seymour of my staff at (202) 366-6965.

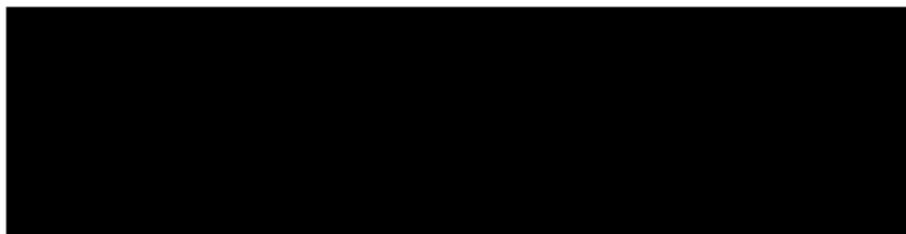
Sincerely,



Kathleen C. Demeter, Director  
Office of Defects Investigation

Attachments:  
Estes Invoice;  
Zubko Letter

Enclosures:  
Data Collection Disc





June 19, 1998



**STRICK CORPORATION**  
**STRICK FINANCE CO.**

225 Lincoln Highway  
 Fairless Hills  
 Pennsylvania, USA  
 19030-0009  
 215-949-3600

Dear Valued Customer:

In the past few months, several of our customers have reported unexpected problems with wheel ends using Mobilith SHC007 synthetic grease. We have become aware of instances where an inadequate amount of grease reaching the bearings has apparently led to bearing failure. The purpose of this letter is to share some information with you and to request your attention to this matter in order to prevent problems with your wheel ends.

1. When the matter was first brought to our attention we reviewed our processes to confirm that we have been installing a consistent amount of grease in accordance with the manufacturer's recommendations. Our review disclosed that we have at least eight different documents on file from Mobil each of which has slightly different instructions. In view of this, while we believe that we have followed the manufacturer's recommendations, we must note that these recommendations have changed over time. We also wish to note that our standard axle manufacturer has different installation instructions than Mobil recommends.
2. In the course of investigating this situation, we came to understand that some customers have not been checking lubricant levels in their wheel ends. We want to advise you that Mobil has now published service and inspection intervals and procedures for wheel ends using their product that must be followed. We understand that they require inspection about every 100,000 miles. We also note that there is evidence that some components of the product dissipate to some degree.
3. While we want to attempt to meet the requirements of our customers and recognize that changes can be positive, we do not recommend and have not recommended grease as a wheel end lubricant in the production of new trailers. We recommend 90 weight gear oil for wheel end lubrication, which is the Strick standard and has been for many years. In view of the growing evidence that Mobilith SHC 007 will not meet our customer's expectations, if you wish us to continue to use this product, or other synthetic lubricants, on new production we will need written direction from you as to how much lubrication to install. We do not want to hold ourselves out as experts.

We intend to continue to support all our customers' efforts to learn more about this and other new lubrication products that are available on the market. If you have comments or questions regarding this issue please let us know and we will try to help you find expert answers.

Sincerely,

*Ronald L. Zubko*

Ronald L. Zubko

**VAN DIVISION**

301 North Polk Street  
 Monroe, Indiana  
 45772-0277  
 219-692-6121  
 Fax 219-692-6022