



950 I-30 East  
Mt. Pleasant, TX 75455  
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October 16, 2013

**VIA EMAIL**

National Highway Traffic Safety Administration  
ODI/Recall Management Division – NVS-215  
1200 New Jersey Avenue SE  
Washington DC 20590

RE: Part 573 Defect and Noncompliance Report

Dear Sir/Madam:

On or about October 9, 2013, Big Tex Trailer Manufacturing, Inc. (Big Tex) determined that a defect, which relates to motor vehicle safety, exists in the trailers listed below and in the attached "Initial NHTSA Notification, Notice of Proposed Recall of Models 10PI, 12PI, 14PI, 29SA, 30AA, 30LS, 30SA, 30SV, 35AA, 35LS, 35SA, 35SV, 45LA, 45SS, 50LA, 50SA, 60SP, 70LR, 70PI, 70SP and 70TV Safety Related Defect", and Big Tex is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports. The affected trailers are manufactured by Big Tex Trailer Manufacturing, Inc. under the "Big Tex" brand name and involve Big Tex Models 10PI, 12PI, 14PI, 29SA, 30AA, 30LS, 30SA, 30SV, 35AA, 35LS, 35SA, 35SV, 45LA, 45SS, 50LA, 50SA, 60SP, 70LR, 70PI, 70SP and 70TV trailers.

Date of Report: October 16, 2013

The corporate name and contact of the manufacturer of the recalled trailers is:

Dan Presley  
Big Tex Trailer Manufacturing, Inc.  
950 I-30 East  
Mt. Pleasant, Texas 75455  
(903) 575-0300, Ext. 2175  
(903) 572-7348 – facsimile  
Email: [dan.presley@bigtextrailers.com](mailto:dan.presley@bigtextrailers.com)

Further information, as required, is included in the attachments to this notification, entitled "Initial NHTSA Notification, Notice of Proposed Recall of Models 10PI, 12PI, 14PI, 29SA, 30AA,

30LS, 30SA, 30SV, 35AA, 35LS, 35SA, 35SV, 45LA, 45SS, 50LA, 50SA, 60SP, 70LR, 70PI, 70SP and 70TV Trailers, Safety Related Defect". Drafts of the notification documents are also attached.

Sincerely,

A handwritten signature in black ink that reads "Dan Presley". The signature is written in a cursive, flowing style with a large initial 'D'.

Dan Presley  
Quality Control

**Initial NHTSA Notification,  
 Notice of Proposed Recall of Models  
 10PI, 12PI, 14PI, 29SA, 30AA, 30LS, 30SA, 30SV, 35AA, 35LS, 35SA, 35SV, 45LA,  
 45SS, 50LA, 50SA, 60SP, 70LR, 70PI, 70SP and 70TV  
 Safety Related Defect**

1. Vehicle Models Involved in Recall:

- a) Make(s): Big Tex Trailer Manufacturing, Inc.
- b) Model Years Involved: 2013 - 2014
- c) Model(s): 10PI, 12PI, 14PI, 29SA, 30AA, 30LS, 30SA, 30SV, 35AA, 35LS, 35SA, 35SV, 45LA, 45SS, 50LA, 50SA, 60SP, 70LR, 70PI, 70SP, 70TV
- d) Productions Dates: Beginning: March 2013  
Ending: September 30, 2013
- e) VIN Range: Please see attached Exhibit "A"
- f) Vehicle Type: Trailer Body Style: Utility
- g) Descriptive information which characterizes/distinguishes the recalled vehicles from those models not included in the recall:

The subject trailers are equipped with a fold flat ramp gate system which allows the trailer ramp gate to fold flat into the bed of the trailer. The fold flat ramp gate system was introduced on selected models in March 2013. Prior ramp gates had a rigid latching system which would preclude the ramp from folding flat inside the trailer.

2. Number of Vehicles Potentially Involved:

Model	2013	2014	Total
10PI	6	2	8
12PI	2		2
14PI	7	5	12
29SA	177	80	257
30AA	7	3	10
30LS	9		9
30SA	714	293	1,007
30SV	233	119	352

35AA	5	4	9
35LS	14	7	21
35SA	2,535	991	3,526
35SV	238	118	356
45LA	33	15	48
45SS	100	85	185
50LA	415	138	553
50SA	8	1	9
60SP	16	3	19
70LR	32	7	39
70PI	206	48	254
70SP	13		13
70TV	143	47	190
<b>Grand Total</b>	<b>4,913</b>	<b>1,966</b>	<b>6,879</b>

3. Total Number Potentially Affected by the Recall: 6879

- a) Estimated percentage of the total number of vehicles estimated to actually contain the defect: 100%
- b) How was the recall population determined:

Upon investigation, the recalled models were selected because they were the only models manufactured during a particular period within which the fold flat gate system was utilized. Big Tex determined that the specific latch design had been put into use in March of 2013. As soon as the defect was verified, the fold flat gate with latch system was pulled from inventory and a re-design began.

4. Describe defect or noncompliance (should address the nature and physical location of defect or noncompliance)

- a) **Describe cause of defect:** Road vibration and the subsequent vibration in ramp gate caused stress and metal fatigue in the ramp gate latch.
- b) **Describe consequence of defect condition:** If one ramp gate latch fails and goes undetected, the second ramp gate latch has a higher probability of failure, due to increased ramp gate vibration. Should both ramp gate latches fail while the trailer is in tow, the ramp gate will fall from the upright, stowed position into the down position, and be dragged behind the trailer.
- c) **Identify any warnings, which can precede or occur:** Prior to a full ramp gate latch failure, stress cracking may be detected on the ramp gate latch bracket, which is welded on to the trailer ramp.

5. Chronological summary of the principal events that were the basis for determination of the defect – describe in detail the events starting with the first report of a problem and the events that were involved in the investigation and determination of a defect.

On or about September 25, 2013, Big Tex Warranty received a customer complaint that both latches on a fold flat ramp gate had failed while in tow, causing the ramp to fall. Immediately upon notification of this incident, Big Tex began an investigation which included a review of warranty records and inspection of subject trailer models. Subsequently on September 27, 2013, Big Tex discontinued production of the fold flat ramp gate design.

6. Furnish description of the manufacturer's remedy of the defect – cite differences between recall condition and remedy – include description of the repair or fix – identify how repaired trailer is different from recalled trailer

- a) Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly:

No component is being recalled. However, two (2) "Hat Brackets" will be added to the trailer (one for each gate latch). These brackets will be bolted to the existing ramp gate and ramp gate latch to provide additional strength and security.

The trailers, as manufactured, do not have the "hat brackets." The "hat brackets" will be added to each affected trailer as stated above to remedy the potential failure of the ramp gate latch. The "Hat Bracket" kit will include all necessary parts for the retrofit. Additional spare parts to ensure ramp gate assembly is fully compliant with factory specifications will also be included. The parts list, tools needed, and installation instructions are included as Exhibit "B".

- b) Describe how and when recall condition was corrected in production:

On September 27, 2013, production of the fold flat ramp gate system was discontinued.

7. Identify Recall Schedule:

- a) Initial notification to dealers: On or before November 15, 2013.
- b) Shipment of replacement parts to dealers: On or before November 15, 2013.
- c) Initial notification to retail purchasers and registered owners: Notification of retail purchasers and registered owners will begin as soon as they are identified,

but it is anticipated that the majority, if not all, will be identified and have notices mailed to them on or before December 15, 2013.

d) We see no problem in implementing this recall.

8. Drafts of the notification documents are attached.

- a) Proposed Dealer Letter with Service Bulletin
- b) Proposed Owner Letter
- c) Proposed Owner Notification Form