



950 I-30 East
Mt. Pleasant, TX 75455
Phone (903) 575-0300
Fax (903) 577-8858

October 24, 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 October 16, 2013, Big Tex Trailer Manufacturing, Inc. ("Big Tex") filed its Initial Part 573 Defect and Noncompliance Report regarding Big Tex model Models 10PI, 12PI, 14PI, 29SA, 30AA, 30LS, 30SA, 30SV, 35AA, 35LS, 35SA, 35SV, 45LA, 45SS, 50LA, 50SA, 60SP, 70LR, 70PI, 70SP and 70TV trailers.

It has been determined that the reported total population of affected trailers was incorrect and a couple documents were not included as required. Therefore, Big Tex is filing this AMENDED 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 to correct the recall population and provide the missing documents.

Additionally, a decision was made to notify the retail branch of Big Tex, Big Tex Trailer World, Inc. of the defect, and begin a proactive campaign to repair the affected units still in the Company's inventory. (Big Tex Trailer World, Inc. is a wholly owned subsidiary of Big Tex Trailer Manufacturing, Inc.) Attached is a copy of the email and Service Bulletin provided to the store locations on October 23, 2013 alerting them to the defect, and providing the necessary information to proceed with the repair and reporting of the affected units still held in inventory.

Sincerely,

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

Dan Presley
Quality Control

**AMENDED 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**

The Initial NHTSA Notification, submitted on October 16, 2013 is being amended to correct the number of involved vehicles and to include missing documents (Exhibit B and the Recall Envelope), which were inadvertently left out. The previous report did not include those units still in inventory at the main manufacturing plant. Therefore, the only changes to this report are at Items 1(e), 2 and 3, and Exhibit B and the proposed Recall Envelope are now included.

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" and "A-1"
- 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	11	5	16
12PI	2		2
14PI	7	5	12
29SA	179	96	275
30AA	8	6	14
30LS	11		11
30SA	754	367	1,121
30SV	238	155	393
35AA	6	7	13
35LS	15	8	23
35SA	2,567	1,163	3,730
35SV	253	159	412
45LA	33	24	57
45SS	100	100	200
50LA	464	227	691
50SA	10	1	11
60SP	19	2	21
70LR	32	13	45
70PI	226	87	313
70SP	17		17
70TV	147	76	223
Grand Total	5,099	2,501	7,600

3. Total Number Potentially Affected by the Recall: 7,600

- 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