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By Recall Management division at 3:12 pm, Dec 05, 2013

Covered Wagon Trailers, LLC

Part 573 Report

Date: September 6, 2013

This report serves as notification by **Covered Wagon Trailers, LLC** to the National Highway Traffic Safety Administration (“NHTSA”) that a motor vehicle safety-related issue exists in certain travel trailer locks supplied by Fastec Industrial Corp., a division of WESCO Distribution, Inc., for installation in the doors of Recreational Vehicles (“RVs”). Additional information concerning the recalled locks can be found in Fastec’s Part 573 Report that was separately filed on July 11, 2013 with an assigned NHTSA Recall #13E039.

I. Manufacturer, Designated Agent, and Other Chain of Distribution Information

Filing Firm Name: **Covered Wagon Trailers, LLC**
Address 1: 142 Benjamin Hill Dr.
City: Fitzgerald
State: GA
Postal Code: 31750
Email address: scottc@coveredwagontrailers.com
Telephone: 229-423-4048
Fax: 229-423-4053
Web Site: www.coveredwagontrailers.com

Contact Person: Scott Ciccone
Title: Purchasing Manager
Email address: scottc@coveredwagontrailers.com
Telephone: 229-423-4048
Fax: 229-423-4053

Importer/Distributor: Fastec Industrial Corp.
2219 Eddie Williams Rd
Johnson City, TN 37601

Manufacturer: Zhongshan Huafeng Locks Co., Ltd.
South of Yongning Industrial Avenue
Xiaolan Town, Zhongshan, Guangdong
People’s Republic of China

II. Identification of the Recall Population and Its Size

Type of Equipment:

The product consists of certain travel trailer locks with a keyed paddle handle and deadbolt (the “locks”) installed in the doors of RVs. Only FIC locks that have an integrated deadbolt are affected by this recall. The RVs potentially affected by the recall are as follows:

Brand:

Model Nos:

Model years: January 2006 – April 2013.

Body Style/Type:

Total Product Sold:

Covered Wagon Trailers, LLC sold a total of 288 travel trailers with an FIC deadbolt lock between January 1, 2006 and April 25, 2013. This total includes locks with any key code, not just the subset of 20 key codes that may be affected by the recall.

Current Inventory Estimates:

Covered Wagon Trailers, LLC has reviewed its current inventory of travel trailers and has no travel trailers in its inventory with any potentially affected locks.

Percentage of Recall Population Estimated to be Affected:

Covered Wagon Trailers, LLC believes that some unknown subset of travel trailers with an FIC deadbolt lock sold between January 2006 and April 2013 may potentially be affected.

III. Description of Issue and Type of Hazard

In or about June/July 2013, Fastec notified **Covered Wagon Trailers, LLC** that Fastec intended to initiate a recall of the potentially affected locks due to a potential jamming issue with the deadbolt cylinder. If a lock is affected, the key may be able to be removed from the locked door when the key in the deadbolt cylinder is in the horizontal 9 o'clock position, potentially jamming the deadbolt and potentially causing the red lever on the interior side of the lock to become inoperable. In that event, a person inside the travel trailer may not be able to unlock and open the main RV door, but he or she could still exit the trailer from the emergency exit.

IV. The Remedy Program and Its Schedule

Upon approval of the proposed recall and the recall announcement, **Covered Wagon Trailers, LLC** will work with Fastec to notify consumers of the recall. **Covered Wagon Trailers, LLC** estimates that it will issue consumer notifications in the fourth quarter of 2013. **Covered Wagon Trailers, LLC** will coordinate the recall efforts with Fastec and will refer consumers to Fastec for free replacement of the cylinders in any affected locksets as described more fully in Fastec's Part 573 Report.



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

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

November 15, 2013

Covered Wagon Trailer
142 Benjamin Hill Drive
Fitzgerald, GA 31750

NVS-215cg
EQ 13-006
13E-039

Subject: Second Request for Information – Response Required

Dear Materials Manager:

On August 29, 2013, we wrote to Covered Wagon Trailer as part of an ongoing investigation being conducted by the Office of Defect Investigations (ODI) at the National Highway Traffic Safety Administration (NHTSA) concerning a safety issue involving 288 travel trailer door locks that were sold by Fastec Industrial Corporation to your company for possible installation into motor vehicles, including recreational vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

This letter is being sent in order to remind Covered Wagon Trailer that it must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Response submission may be made by US Mail to the address listed therein or by e-mail to rmd.odi@dot.gov and cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number, EQ 13-006.

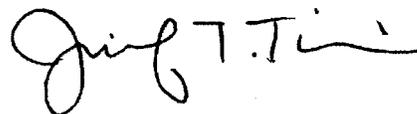
If Covered Wagon Trailer claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended, (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company 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. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

This letter is being sent to your company 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. Your company's failure to respond promptly and fully to this letter could subject your company 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. Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$6,000 per day, with a maximum of \$17,350,000 for a related series of violations, or for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 75 Fed. Reg. 79978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

I urge Covered Wagon Trailer to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed, and in order to avoid potential enforcement action against your company in addition to substantial penalties for failure to respond to an inquiry issued during an official investigation.

Should you have any questions regarding this inquiry, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with the first name "Jennifer" written in a larger, more prominent script than the last name "Timian".

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement