



Meritor, Inc.  
2135 West Maple Road  
Troy, Michigan 48084-721 USA  
800-535-5560 Tel

[meritor.com](http://meritor.com)

December 23, 2013

National Highway Traffic Safety Administration  
1200 New Jersey Ave. S.W.  
Washington, D.C. 20590  
Attention Associate Administrator of Enforcement

Email: [RDM.ODI@dot.gov](mailto:RDM.ODI@dot.gov)

RE: Defect Information Report relating to misassembled washer, pin, and jam nut on remanufactured axles shipped to Trac Intermodal. The axles were manufactured between June 1, 2013 and June 30, 2013.

Meritor File: C14AB

NHTSA File: Not Assigned

Ladies & Gentlemen:

Meritor, Inc. submits this Defect Information Report in accordance with 49 CFR 573.6 the information is presented to correspond to the sub-paragraphs of section 573.6 (c).

**Information Requested under 573.6(c)(1) Manufacturer Submitting Report**

Meritor, Inc.  
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**Information Requested under 573.6(c)(2) Identification of Affected Product**

This report covers the following Meritor axle models which were built during June 1 to June 30, 2013:

Trailer Axles RMT14512ABS  
Trailer Axles RMT14612

**Information Requested under 573.6(c)(3) Potential Affected Vehicle Population**

There are 100 remanufactured axles on 50 Trac Intermodal vehicles that are covered by this Report.

**Information Requested under 573.6(c)(4) Percentage of Affected Vehicles**

Meritor estimates the failure rate on the affected population to be approximately 2% of the suspect remanufacturer axles.

**Information Requested under 573.6(c)(5) Description of Defect or Noncompliance**

The lock washer and pin were assembled misaligned during the remanufacturing process, resulting in the pin not engaging and jam nut not being torqued to specification. The combination can create increased endplay and a potential wheel separation.



**Information Requested under 573.6(c)(6) Chronology of Principal Events Leading to Determination of a Safety Defect**

- 10/16/13 Customer reported loose wheel end on Trac Intermodal Chassis.
- 10/23/13 Meritor confirmed that 30 units on site at Meritor were correctly assembled.
- 11/14/13 Meritor was informed that five units from field were checked during routine preventative maintenance, and that all were correctly assembled.
- 11/19/13 Meritor updated manufacturing work instructions and in process audits.
- 12/19/13 Meritor completed its engineering analysis, and determines that inspection of product in field should be initiated to ensure correct assembly on all potentially affected units.

**Information Requested under 573.6(c)(7) Information Used in Determination of Noncompliance**

There is no impact of this issue towards non-compliance with a motor vehicle standard.

**Information Requested under 573.6(c)(8) Description of Remedy**

Meritor will be contacting its customer, Trac Intermodal, by way of a Defect Information Notice with the recommendation that they contact Meritor at their earliest convenience to schedule an inspection and, where appropriate, have the procedures described in Meritor Technical Publication that is currently under development.

Meritor is in process of developing the Notice and accompanying service instructions and will submit that information to NHTSA as soon as available. The following is an approximate schedule for the program:

- 1/03/14 Complete revised notification to Trac Intermodal  
1/20/14 Distribute notification to Trac Intermodal

In addition, Meritor has determined that, to the extent any of the partially affected axles were remedied prior to this notification, it was done at no expense to the vehicle owners and occurred through Meritor's warranty system. Therefore, Meritor does not believe that a general pre-notification reimbursement remedy program is required.

We trust that the information provided in this document is fully responsive to the requirements of 49 CFR 573.6. All addition or modifications to any of the information given will be reported promptly to NHTSA. Any questions with respect to the information provided should be directed to the undersigned.

Respectfully Submitted,

Christine Wright  
Meritor, Inc.  
Project Manager, Product Safety and Compliance