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NHTSA Recall # EQ 13-006

Bay Bridge Manufacturing LLC.

1301 Commerce Drive

Bristol, IN 46507

Date: December 5, 2013

This report serves as Bay Bridge Manufacturing LLC's notification to the U.S. Department of Transportation, National High Traffic Safety Administration that a motor vehicle safety-related issue exists in certain travel trailer locks sold by Fastec Industrial Corp, as well Recreational Vehicle (RV) style doors manufactured by Keyline sales that contain defective Fastec trailer locks.

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

Manufacturer's corporate name: Bay Bridge Mfg. LLC

Vehicle Brand or Trademark Owners Name: (Box): Bay Bridge Manufacturing LLC

(chassis): GMC, Chevrolet and Ford Motor Company.

Designated Agent: Sean McCarthy

Contact: Sean McCarthy

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The defective travel trailer locks were purchased from two separate vendors in two different forms. The primary form in which the defective travel trailer locks were purchased was in complete Recreational Vehicle (RV) door assemblies from Keyline Sales Inc.. The secondary form in which the defective travel trailer locks were purchased was in a loose (Latch/Lock Only) from Fastec Industrial Corporation (a division of WESCO Distribution Inc.).

Manufacturers:

Keyline Sales Inc.: 2502 Marina Dr. Elkhart, IN 46515

Phone: 574-294-5611

Fastec Industrial Coporation(A division of WESCO Distribution Inc):

225 West Station Square Drive, Suite 700 Pittsburgh, PA 15219

NHTSA Recall # EQ 13-006

Contact: Bryan D. Kocher

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II. Identification of the Recall Population and Its Size

Make: Chevrolet, GMC, Ford

Model: Bay Bridge Mfg Classic Unit

Model Year(s): 2006 – 2013

Inclusive Dates of Manufacture: January 2006 – July 2013

Body Style: Cargo hauling body/truck

Other Information: n/a

Total Number of Vehicles: 67 Units Produced.

Make: Chevrolet, GMC, Ford

Model: Bay Bridge MFG Sheet & Post Units

Model Year(s): 2006 – 2013

Inclusive Dates of Manufacture: January 2006 – July 2013

Body Style: Cargo hauling body/truck

Other Information: n/a

Total Number of Vehicles: 21 Units Produced.

NHTSA Recall # EQ 13-006

Make: Chevrolet & GMC: G3500 Van Cutaway Chassis, G4500 Van Cutaway Chassis, 1 Ton Silverado Cab Chassis.
Ford: E350 Van Cutaway Chassis, E450 Van Cutaway Chassis, F450 Cab Chassis, F550 Cab Chassis.

Model: Bay Bridge MFG FRP Units

Model Year(s): 2006 – 2013

Inclusive Dates of Manufacture: January 2006 – July 2013

Body Style: Cargo hauling body/truck

Other Information: n/a

Total Number of Vehicles: 93 Units Produced.

Make: Bay Bridge MFG

Model: Bay Bridge MFG Trailers – Sheet & Post Units

Model Year(s): 2010 – 2011

Inclusive Dates of Manufacture: March 2010 – January 2011

Body Style: Cargo hauling trailers

Other Information: n/a

Total Number of Vehicles: 4 Units Produced.

Make: Parts Sales

Model: Complete Recreational Vehicle(RV) Doors

Years Sold: 2006 – 2013

Inclusive Dates Sold: February 2006 – July 2013

Body Style: N/A

Other Information: N/A

Total Number of Parts Sold: 38 Complete or Loose Units

NHTSA Recall # EQ 13-006

Grand total number of vehicles: 185 Units were produced with the affected doors/locks.

Percentage of recall population estimated to actually contain defect or noncompliance: 2.8175%

Grand total number of parts Sales: 38 complete RV doors or Loose RV Handles were sold as parts orders.

Percentage of part sales population: 1.0298%

In September of 2013 Bay Bridge MFG was notified by Fastec Industrial Corporation, Keyline Sales Inc. and the National Highway Traffic Safety Administration that a recall was in effect for travel trailer locks manufactured by Fastec Industrial Corporation between January 2006 – March 2013. Upon notification of the recall Bay Bridge MFG began the process of determining the recall population.

To determine the recall population, sales and parts invoices from 2006 – 2013 were hand sorted, with each affected invoice being pulled and sorted by production year. Affected units were determined by whether or not the invoice called for a Recreational Vehicle (RV) style door/latch to be installed. Inclusive dates of manufacture were determined by matching up the inclusive dates of the product recall with the dates of unit production.

The recall population differs from similar vehicles produced by Bay Bridge Mfg., in that RV Style doors are not a standard option on the units that we produce. RV Style doors are an additional option that the customer must specify they would like included in their order. I.E. unless it was specified, any similar vehicle's would not be affected by the recall.

III. Description of the Defect or Noncompliance and Chronology of Events

“Some of the affected locks may not conform to the design specifications that had initially been established. As designed, keys cannot be removed from the deadbolt cylinder(the bottom cylinder) in the locked door when the key is in the horizontal, 9 o'clock position. Instead, the lock is designed so that a key can be removed from the deadbolt”

- “These 9 model numbers (Three models in three colors each) are the only deadbolt RV door locks that Fastec sold. Fastec sold other RV door locks that did not have a deadbolt. The locks without a deadbolt are unaffected.”
- “Fastec sold the potentially affected model numbers of the deadbolt locks with 51 different key cods. In product testing, samples of 20 key codes experienced an issue with removal of the key in the 9 o'clock position; samples of the remaining 31 key codes did not. Nevertheless, consumers with any Fastec deadbolt RV door lock should test their lock to determine whether it is affected.”

“Cylinder only when the key is in the vertical 12 o'clock position or in the horizontal 3 o'clock position. In those positions, removal of the key from the lock permits the door to be opened from inside the RV without a key by operating the red lever on the interior side of the lock to unlock the door. If a lock is affected, however, a key may 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.”

“Thus, in the event that: (1) a lock is affected; (2) the deadbolt in the door is locked from the outside with the key; (3) the key is removed from the deadbolt lock cylinder only when the key is in the 9 o’clock position; (4) a person is inside the RV; and (5) nobody outside the RV is available to unlock the deadbolt in the door with a key, a person inside the RV may not be able to unlock and open the main RV door, but he or she could still exit the RV from the emergency exit.”

How and When Discovered:

“In December 2012, WESCO, Fastec, a RV door manufacturer (Philips Products), and a RV manufacturer (Forest River, Inc.) settled a lawsuit that was brought by a consumer who alleged that she was injured when she exited her RV travel trailer from the emergency exit. The consumer alleged that she could not open the main RV door that had been locked by her husband with his key from outside the RV. (Kelly v. Fastec Industrial Corp., et al., Case No. 6:11-cv-06256-TC (D. Or.).)”

“In the course of defending the lawsuit, the lock on the consumers door was examined. It was manufactured in 2006. During 2006, some concern was expressed about the possibility that some locks manufactured by Huafeng might not conform to the design specifications, but Fastec believed those concerns had been fully addressed and finally resolved by Huafeng. It ultimately was discovered, however, that the lock in the *Kelly* lawsuit was affected as described above with the key being able to be removed from the deadbolt cylinder in the 9 o’clock position and the red lever on the interior side of the lock becoming inoperable under those conditions.”

“Huafeng and Fastec both investigated the issue further to determine whether any other deadbolt locks – regardless of the date of manufacture, the model number, or they key code – could have been similarly affected.”

“Specifically, on or about April 20, 2013, Huafeng reported to Fastec that Huafeng believed that some unknown subset of locks bearing eight separate key codes could potentially be affected. Huafeng subsequently reported on June 28, 2013 that further testing of the locksets indicated the possibility of removing the key in the 9 o’clock position in locks with 15 different key codes. Fastec also independently arranged to have an independent laboratory test samples of all the key codes used in all models of deadbolt RV locks in its inventory. It determined that locks with 15 different key codes (most of which were the same as those determined by Huafeng) could potentially be affected. In all, 20 separate key codes as identified above were determined to potentially be affected.”

“Fastec has no legal department of its own, but sought assistance from the WESCO legal department in connection with this matter. WESCO primarily in the business of selling wholesale electrical and industrial parts, no consumer products. Accordingly, outside counsel was retained to assess whether Fastec had any reporting obligations under the consumer product safety laws.”

“Outside counsel advised that Huafeng and WESCO both may have an obligation to report the issue. The same day that WESCO’s General Counsel received this advice, a decision was made to submit a report, to conduct a recall, and to invite Huafeng to participate in the recall process. Huafeng declined to participate.”

“WESCO first filed an initial report with the Consumer Product Safety Commission (“CPSC”) on June 12, 2013. The CPSC advised WESCO that the CPSC Office of General Counsel determined that the product falls under the jurisdiction of NHTSA, rather than CPSC.”

Types of Hazard:

"If a lock is affected, the key may be removed from the deadbolt cylinder(the bottom cylinder) in the locked door when the key 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 the event that: (1) a lock is affected; (2) the deadbolt in the door is locked from the outside with the key; (3) the key is removed from the deadbolt lock cylinder only when the key is in the 9 o'clock position; (4) a person is inside the RV; and (5) nobody outside the RV is available to unlock the deadbolt in the door with a key, a person inside the RV may not be able to unlock and open the main RV door, but he or she could still exit the RV from the emergency exit."

Discussion of Known Injuries:

"Fastec has received only one report of a consumer injury. The plaintiff in *Kelley* allegedly fell when she could not exit the RV from the main door and, instead, used the RV's emergency exit. She sustained a herniated cervical disc and a fractured vertebra allegedly as a result of that fall."

"There are no other lawsuits, and no other reports of injury of which Fastec is ware."

(Information and language in this section was pulled from Fastec Industrial Corps. 573 Report 13E-039)

IV. The Remedy Program and Its Schedule

Bay Bridge Mfg has or will unilaterally and voluntarily take the following steps:

In May of 2013 Bay Bridge Mfg ceased the purchasing and use of all Fastec and Keyline manufactured RV Doors and RV Style door latches indicated in the recall, before being aware of any such recalls. From a production standpoint, no other changes are necessary. To ensure thoroughness Bay Bridge has tested its current stock of RV style latches for any signs of defect, finding that there were no issues.

Fastec has voluntarily offered to pay for repairs or replacements caused by the defective lock cylinders at no cost to the consumer. Instructions for reimbursement/replacement will be included in Bay Bridge Mfg's recall notice to its affected customers.

Upon approval of the proposed recall and the recall announcement, Bay Bridge Mfg proposes to notify consumers of the recall. Bay Bridge Mfg estimates that it will issue consumer notifications by December 23, 2013. As part of the recall Bay Bridge Mfg proposes to:

- (1) Give consumers instructions on how to identify whether they have a Fastec Deadbolt RV door lock with one of the 20 potentially affected key codes, which appear on the keys. Consumers with one of those 20 key codes should immediately participate in the recall.
- (2) Give consumers who have any Fastec deadbolt RV door lock with one of the 31 other key codes instructions on how to determine whether they have a lock that is actually affected - can you remove the key from the deadbolt cylinder (the bottom cylinder) of the locked door when the key is in the horizontal 9 o'clock position? Consumers with an affected lock with any key code should immediately participate in the recall.

- (3) Pending replacement of the lock cylinder, advise consumers who own a deadbolt RV door lock that is subject to the recall to cease using the key to lock the door with the deadbolt from the outside, or, if they must do so, ensure that the key is removed from the deadbolt cylinder in the locked door only when the key is in the vertical 12 o'clock position, in which case the deadbolt lock functions as designed.
- (4) Advise consumer who opt to participate in the recall that Fastec will arrange, with no charge to consumers, to send replacements cylinders to the consumer, along with simple and clear instructions by which the consumer can removed the affected cylinders and insert the replacement cylinders in their place. It literally takes only a couple of minutes to complete the replacement. A replacement cylinder kit, including instructions and new cylinders for both the paddle handle and deadbolt, will be provided free of charge.
- (5) Advise the consumers to send the affected cylinders back to Fastec, at no cost to the consumer.