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Stoughton Trailers, LLC

Ms. Nancy L. Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RMD.ODI@dot.cog

May 21, 2014

Re: Defect Information Report; Stoughton Trailers, LLC;
Suspension Arms Pivot Bolt Defect on SAF-HOLLAND Suspensions

Dear Ms. Lewis:

Through the undersigned, Stoughton Trailers, LLC ("Stoughton") is submitting the enclosed Defect Information Report pursuant to 49 CFR Part 573.

Stoughton has determined that certain Stoughton brand model year 2014 AVW, AVXW, ZGPVW and AHV model trailers built with SAF-HOLLAND CBX 40 or CBX 23 suspensions may experience failures of the suspension arm pivot bolts. The failure of a pivot bolt may cause the suspension and attached axle to break away from the trailer causing a safety hazard. The supplier of the suspension, SAF-HOLLAND, on May 16, 2014 submitted a Defect Information Report on the pivot bolts that were supplied on these suspensions. Stoughton will cooperate with SAF-HOLLAND to conduct a voluntary safety recall of trailers built by Stoughton that have suspensions with the defective pivot bolts.

If you have any questions, please contact the undersigned by e-mail at fsmidler@stoughtontrailers.com or by telephone at 608.873.2569.

Sincerely,

Francis S. Smidler, Manager
Research and Development
Engineering

Enclosure



Stoughton Trailers, LLC

DEFECT INFORMATION REPORT

**SUSPENSION PIVOT BOLT DEFECT ON SAF-HOLLAND SUSPENSIONS
INSTALLED ON STOUGHTON TRAILERS**

May 21, 2014

1. Manufacturer's name/address:

STOUGHTON TRAILERS, LLC
416 South Academy Street
Stoughton, WI 53589

Contact: Francis S. Smidler, Manager of Research and Development Engineering
fsmidler@stoughtontrailers.com
608.873.2569

2. Manufacturer of the suspensions that have the defective pivot bolts:

SAF-HOLLAND, Inc
1950 Industrial Blvd.
Muskegon, MI 49443

Contact James G. Huyge, Director of Reliability and Risk Management
231.777.4302

3. Vehicles Involved:

The vehicles covered by this Report are certain model year 2014 Stoughton brand trailers, models AVW, AVXW and ZGPVW with CBX 40 SAF-Holland suspensions and model AHV with CBX 23 SAF-Holland suspensions. The SAF-Holland suspensions were built from October 8, 2013 to November 30, 2013. The suspensions were installed onto Stoughton brand trailers produced from October 17, 2013 through December 18, 2013.

Model: AVW
 Model Year: 2014
 Dates of Manufacture: October 22, 2013 through December 18, 2013
 Type: Dry van semi-trailer
 Other Information: SAF-Holland CBX 40 tandem axle suspensions,
 manufacture date Oct 8, 2013 (date code 281) through Nov
 30, 2013 (date code 334)

Number of vehicles: 89
 Less vehicles corrected before delivery: 23
 Less vehicles exported to Canada: 20
 Total number of vehicles in US recall: 46

Model: AVXW
 Model Year: 2014
 Dates of Manufacture: December 3, 2013 through December 16, 2013
 Type: Dry van semi-trailer
 Other Information: SAF-Holland CBX 40 tandem axle suspensions,
 manufacture date Oct 8, 2013 (date code 281) through Nov
 30, 2013 (date code 334)

Number of vehicles: 17
 Less vehicles corrected before delivery: 2
 Less vehicles exported to Canada: 8
 Total number of vehicles in US recall: 7

Model: ZGPVW
 Model Year: 2014
 Dates of Manufacture: October 17, 2013 through December 17, 2013
 Type: Dry van semi-trailer
 Other Information: SAF-Holland CBX 40 tandem axle suspensions,
 manufacture date Oct 8, 2013 (date code 281) through Nov
 30, 2013 (date code 334)

Number of vehicles: 750
 Less vehicles corrected before delivery: 258
 Less vehicles exported to Canada: 15
 Total number of vehicles in US recall: 477

Model: AHV
 Model Year: 2014
 Dates of Manufacture: November 5, 2013 through November 21, 2013
 Type: Ag hopper semi-trailer
 Other Information: SAF-Holland CBX 23 single axle suspensions in pairs, manufacture date Oct 8, 2013 (date code 281) through Nov 30, 2013 (date code 334)
 Number of vehicles: 26 (22 w/2 susp & 4 w/1 susp)
 Less vehicles corrected before delivery: 3
 Less vehicles exported to Canada: 0
 Total number of vehicles in US recall: 23

4. Total number of vehicles covered by this report:

SAF-HOLLAND notified Stoughton that 856 CBX 40 tandem axle suspensions and 48 CBX 23 single axle suspensions with defective pivot bolts were supplied to Stoughton. They were installed on 882 trailers of which 286 trailers are still at Stoughton's production facilities in Wisconsin. The 286 trailers at Stoughton will not be delivered until the pivot bolts are replaced and therefore will not be included in the recall population.

<u>Model</u>	<u>Qty By Model</u>	<u>CORRECTED BEFORE SHIPPING</u>	<u>EXPORTED TO CANADA</u>	<u>TOTAL POP US RECALL</u>
AVW	89	23	20	46
AVXW	17	2	8	7
ZGPVW	750	258	15	477
AHV	26	3	0	23
TOTAL	882	286	43	553

Total number of vehicles in US recall: 553

5. Approximate percentage of vehicles estimated to actually contain the defect:

100% of all listed trailers

6. Description of the defects:

Stoughton received 7 warranty claims for failure of suspension pivot bolts located at the forward end of a suspension arm on SAF-Holland CBX 40 air ride suspensions. The claims were for one failed bolt on 7 different trailers. The bolt heads were missing but the shaft of some of the bolts were still in place and were collected for analysis. The pivot bolts are SAF-Holland part number 93201070, BOLT HEX 1.12"-7 x 8.0 GR 8. Failed bolts were turned over to SAF-Holland for evaluation.

SAF-Holland reported back that they believe the pivot bolts were improperly heat treated resulting in intergranular quench cracks under the bolt head. These cracks can lead to failure of the bolt head and separation from the shaft of the bolt. They were able to isolate bolts to a lot

that was used in their production between Oct 8, 2013 and Nov 30, 2013. SAF-Holland provided serial numbers of all suspensions with suspect bolts that were delivered to Stoughton which were then cross reference to the trailers they were installed on.

It is our understanding that SAF-Holland is now validating 100% of their pivot bolt inventory before using them in production.

It is unlikely that both sides of an axle/suspension assembly would fail at the same time. If only one side were to fail the trailer would become misaligned behind the tractor which will be immediately apparent to the driver. If both sides of an axle/suspension assembly were to fail simultaneously it would result in the separation of the axle/suspension assembly from the trailer. Such a separation can cause loss of control of the tractor-trailer rig and/or collision with other vehicles possibly causing serious personal injury or death. Stoughton is not aware of any instances in which a broken pivot bolt in the suspension has led to a loss of vehicle control, a crash, personal injury or death.

7. Chronological summary of events leading to this determination:

13FEB14 – 30APR14: Received reports of 7 missing or broken pivot bolts on Model Year 2014 Stoughton brand trailers with SAF-Holland CBX 40 suspensions.

13FEB14: Report filed with SAF-Holland on first failure.

07APR14: SAF-Holland picked-up two broken bolts found still on trailers after failures.

02MAY14: SAF-Holland reported that the metallurgical analysis indicated the failed bolts had quench cracks that occurred during the heat treating process.

09MAY14: SAF-Holland reported that the batch of suspect pivot bolts was received by them between 10/8/13 and 10/31/13. They were used on CBX 40 and CBX 23 suspensions manufactured for Stoughton from 10/8/13 to 11/30/13.

12MAY14: SAF-Holland recommended that all trailers with the suspect pivot bolts should be campaigned.

15MAY14: Received a draft copy of SAF Holland's Part 573 Defect Report to be sent to NHTSA.

8. Program for remedying the defect:

All affected pivot bolts will be replaced. After replacement the new bolts will be marked with a white paint dot on the head of the bolt.

Stoughton will coordinate with SAF-Holland to conduct a voluntary safety recall at no charge to the owners. Stoughton Trailers, LLC will inform the vehicle owners in the Owner Notification Letter that SAF-Holland will conduct the recall and provide the contact information. SAF-

Holland will provide a list of approved repair shops, replacement pivot bolts, repair instructions and information on billing SAF-Holland directly for repairs made. Stoughton will provide SAF-Holland with a list of trailers with owner contact information. SAF-Holland will report to NHTSA on the progress of the recall of Stoughton trailers as part of their quarterly report. With SAF-Holland reporting, Stoughton will not be providing quarterly reports. Stoughton plans to have monthly update meetings with SAF-Holland in order to monitor progress of the recall.

Stoughton plans to begin notifying owners and dealers within 30 days. Stoughton does not plan to advise purchasers with respect to potential reimbursement pursuant to 49 CFR 573.11 because all reports of pivot bolt failures to date have been addressed at no charge under the vehicle warranty.

Stoughton will provide NHTSA with a copy of its proposed owner notification letter at least five days prior to commencing the recall campaign.

Francis S. Smidler
Manager
Research and Development Engineering