

## **Chronology of events:**

On or about 12/15/14 a wheel off condition was observed on trailer number 1E1Z2Z28XGR054388. This trailer was brought back and repaired and the failure analyzed by East Manufacturing, Walther EMC and MacLean-Fogg representatives, who manufacture the Hub and Wheel end nut, respectively. Failure cause was largely inconclusive and was not treated as a widespread problem.

On or about 1/29/15 a wheel end fire was reported on trailer 1E1F9S383FR053876 and due to logistical problems the issue was not investigated until on or about 2/23/15. The same group was brought in and although the customer was instructed not to disturb the area of interest, it was compromised. Nothing was concluded at this meeting and the axle was sent to Walther EMC for further analysis.

Even though the issue was not yet recognized as being a grease shortage root cause, East began to analyze other possible consistencies and found that both trailer axles were assembled by the same worker. East assembled a list of all the trailers that had axles that were assembled by this individual and sent out the initial field action letter via first class mail on 2/24/15 (sample attached). This list consisted of 16 trailers and 6 customers/dealers. They were instructed to check axles.

On or about 2/26/15 a third event took place. It was a wheel end fire on trailer 1E1Z2Z287GR054557. On or about 3/3/15 Walther EMC informed East that they discovered a shortage of grease in the good side of the axle from event #2 confirming that this was a grease shortage issue. The third axle was assembled by a second worker and investigations were conducted. It was concluded after these investigations that affected trailers were limited to those assembled by these two workers who may not have installed enough grease in axles.

This information led to an expansion of the initial field action to include every trailer that had axles assembled by these two individuals. This increased the list to 129 trailers. 46 of the affected trailers had not been shipped yet so those trailers were checked before they left East's facility. Three were found to be low on grease. This decreased the number of affected trailers in the field action to 83.

On 3/6/15 a second letter was sent out to 11 customers/dealers that were affected by these 83 trailers via registered mail (sample attached). Due to limited response a third reminder letter was sent on 4/17/15 (sample attached) to 10 customers/dealers that had not contacted us indicating completion and 75 trailers were still affected.

A grease sample was sent out to verify it was not a supplier problem. On 4/24/15 a report was received that shows that the grease meets the specifications required.

An East representative attended a TTMA conference where NHTSA's Bruce York gave a presentation on 7/22/15. He stated that he was aware of over 600 companies that were not aware of the requirements to notify NHTSA whenever a company sends an action item to more than one customer/dealer. East was not aware either. East was already handling this issue via a field action since there were very few customers and not many trailers involved in a short timeframe as explained in the chronology above. However, East decided to elevate it

to a recall after hearing Bruce's presentation. Within 5 business days of the presentation East called Bruce and left a voicemail as he was on vacation. After several days of phone tags with Bruce about how to handle this since it was over halfway done he referred East to Alex Ansley of NHTSA who (after several days of phone tags) explained to East how to handle it. East then started working with Josh Neff of NHTSA and got everything entered into the NHTSA website.

On 7/28/15 phone calls were made to the 10 affected customers/dealers. It can be confirmed in writing that there are now 6 affected customer/dealers with a maximum of 64 trailers affected. In addition, via phone calls, it was found verbally that the number may be as low as 27 trailers involving 5 customers.

**Describe how the recall population is different from any similar vehicles not subject to this notification:**

Other similar trailers either have axles filled with oil or were not assembled by the two identified workers.

**I. Description of the Defect or Noncompliance and Chronology of Events**

**Describe the defect or noncompliance, including a summary and detailed description of the nature and physical location (if appropriate) of the defect or noncompliance. Graphic aids should be provided where necessary.**

In the affected trailers the possibility exists that an insufficient amount of grease was installed in the wheel ends at the factory.

**Describe the cause(s) of the defect or noncompliance condition.**

Two identified workers were not building the trailer axles according to proper procedure.

**Describe the safety consequence(s) of the defect or noncompliance condition.**

Lack of grease in the wheel ends can cause the wheel bearings to overheat resulting in bearing seizure, wheel end fires or a wheel off condition.

**Identify any warning(s) that may precede the defect or noncompliance condition.**

Excessive heat coming from the wheel end. A grinding sound coming from the axle or wheel end.

***For defects, provide a dated, chronological summary of all the principle events that were the basis for the determination that the defect is related to motor vehicle safety, including a summary of all warranty claims, field or service reports, and other information such as numbers of crashes, injuries and fatalities.***

See section II for chronological summary of principle events. Attached is a summary of all warranty claims. There have been no known crashes, injuries or fatalities.

## **II. The Remedy Program and Its Schedule**

**Describe the program for remedying the defect or noncompliance, including the plan for reimbursing those owners and purchasers who may have incurred costs to remedy the defect or noncompliance before receiving the manufacturer's notification concerning that defect or noncompliance. Also include, where applicable, details with dates concerning any production remedy that was conducted or will be conducted.**

See attached field action letters for program already instituted including plan for reimbursing those that have incurred costs. Current workers were retrained on proper axle assembly and grease meters were installed on the production line.

**Provide the estimated date(s) on which owner and purchaser notifications will be issued and the estimated date(s) for completion of those notifications.**

Owner and Purchaser notifications have already been issued in the form of a field action. Recall notifications will be issued as soon as NHTSA approves the notification. Completion will be with notification from the customer of completion of the last trailer affected or one year from date of initial letter whichever comes first. Maintenance on the wheel ends should occur naturally at 6 month intervals as detailed in the owner's manuals.

**Provide the estimated date(s) on which dealer and distributor notifications will be issued and the estimated date(s) for completion of those notifications.**

Dealer and Distributor notifications have already been issued in the form of a field action. Recall notifications will be issued as soon as NHTSA approves the notification. Completion will be with notification from the customer of completion of the last trailer affected or one year from date of initial letter whichever comes first. Maintenance of the wheel ends should occur naturally at 6 month intervals as detailed in the owner's manuals.

**Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.**

This is a workmanship issue and not a component issue.