



Great Dane

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2019 JAN 28 P 3:50

January 2, 2019

Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Recall 18V-869 Petition for Part 556-Exemption for Inconsequential Defect of Noncompliance as it pertains to vehicle safety.

To NHTSA Administrator:

This notice is being sent in accordance with the requirements of the National Traffic Motor Vehicle Safety Act.

Applicant:

Great Dane LLC
131 Technology Circle
PO Box 67
Savannah, GA 31407 (PO Zip 31402)

Great Dane is a Limited Liability Corporation organized in Delaware with joint corporate offices in Chicago, IL, and Savannah, GA.

Nature of defect:

Certain 2019 Model year Great Dane Freedom drop-deck platform trailers produced in the Huntsville, TN manufacturing facility may have been produced without a rear impact guard certification plate. Manufacture of these trailers began on July 10, 2018 and progressed until November 8, 2018. A drawing change led to the certification plates being left off of these drop-deck platform trailers. The error was noticed while the trailers were still in production with some of the completed trailers still on the manufacturing facility's yard. These trailers were retrofitted with the required plates prior to being shipped out. Total affected suspected population is 72 drop-deck platform trailers.

Views and arguments:

This is a petition to the NHTSA for exemption from the Act's notification and remedy requirements in regards to recall 18V-869, on the grounds that the noncompliance is inconsequential as it relates to motor vehicle safety. As required by **Part 556 – Exemption for Inconsequential Defect of Noncompliance** section §556.4(b) (5) the following set forth our views and arguments supporting this petition:

It is Great Dane's position that lack of a certification plate that is affixed to the horizontal member of the rear impact guard in no way contributes to a decrease in safety to any motorist. These rear impact guards as manufactured and installed by Great Dane, are compliant as required by the Federal Standard.

www.greatdanetrailers.com

131 Technology Circle | Savannah, GA | 31407 | Office: 912.644.2100 | Fax: 912.644.2164
P.O. Box 67 | Savannah, GA | 31402

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Great Dane

The trailer itself has affixed to it a certification plate that attests to the fact that the entire trailer (including the rear impact guard) does meet and/or exceed the Federal Motor Vehicle Safety Standards in effect on the date of manufacture as indicated. The fact that the certification plate was not installed on this particular group of trailers does not make these trailers any less safe. The lack of the impact guard certification plate, would seem to us, to be an inconsequential type of noncompliance as it relates to vehicle safety.

Additionally, earlier this year the CVSA (Commercial Vehicle Safety Alliance) has agreed to petition both the NHTSA and FMCSA to remove the requirement for the certification plate on the rear impact guard. Great Dane has never installed a third party produced and marketed rear impact guard (to meet the standards of FMVSS 223 and 224) on any of the trailers that we have produced. Every trailer that we have built, that requires a rear impact guard as defined by FMVSS 223 and 224, also has the certification plate on its front that ensures the rear impact guard meets the Federal Standards. It would appear that the extra certification plate required on the rear impact guard horizontal is redundant, and again, the lack of a stamped date on these plates does not present itself as a hazard to motor vehicle safety.

This particular group of trailers (produced without the requisite impact guard certification plate) are no less safe and do not pose as a hazard to motor vehicle safety. The incident that lead to these trailers being produced without the plate attached has been investigated, resolved, and should not occur again in the future. This was an isolated incident.

Sincerely,

Daniel E. Carter
Director, Product Safety & Compliance
Great Dane LLC



Great Dane Trailers

Vehicle Report

NHTSA ID: 18V869 Transaction ID: 18-00573-21597-11 (Amendment 1)

Required fields indicated with *

Manufacturer: Great Dane Trailers	
602 E Lathrop Avenue Savannah GA 31415	James Brown Manager Customer Service/Warranty 9126442475,

This is a Noncompliance Report. Filing a petition pursuant to 49 CFR 556

Vehicle Information	
Great Dane Freedom Platform Trailer 2019	
* Model Yr. Start: 2019	* Model Yr. End: 2019
* Make: Great Dane	Type: TRAILERS
* Model: Freedom Platform Trailer	Body Style: OTHER
Production Dates	Powertrain:
Begin: 07/10/2018	Descriptive Information: A drawing change led to the certification plates being left off drop deck platform trailers. This continued until the error was noticed, and trailers still in production, or still on the manufacturing facility's yard were retrofitted prior to shipping.
End: 11/08/2018	
VIN Range(s): Begin: End:	

Number potentially involved: 72 **Estimated percentage of involved with defect:** 100%

Defect / Noncompliance Description	
For this Defect/Noncompliance:	
<p>* Describe the defect or noncompliance: Certain 2018 model year platform trailers produced in the Huntsville TN manufacturing facility may have been produced without a rear impact certification plate.</p> <p>If a noncompliance, provide the applicable FMVSS: 223 - Rear impact guards</p> <p>If applicable, provide any further FMVSS affected: 224 - Rear impact protection</p> <p>Describe the cause:</p>	<p>* Describe the safety risk: There is no safety risk. The rear impact guards meet the applicable certification standards, the certification plate was just not installed on the rear impact guards. Great Dane will be petitioning the agency since we believe this issue is inconsequential to motor vehicle safety.</p> <p>Identify any warning which can precede or occur:</p>
This Recall affects all vehicles.	
If applicable, identify the manufacturer of the defective or noncompliant component. If the manufacturer of the component is unknown, provide the information for the company that supplied the subject component.	
Component manufacturer	Company Contact Information
Company Information	
Company Name:	First Name:
Country:	Last Name:
Address 1:	Position:
Address 2:	Email:
City:	Phone:
State:	
Zip/Postal Code:	

Chronology of Defect / Noncompliance Determination
<p>Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.: Nov. 29, 2018: During a company wide review of rear impact guard certification plate procedures it was discovered that the Huntsville manufacturing facility may have produced some quantity of platform trailers with nonexempt rear impact guards without certification plates affixed to the rear impact horizontal. Nov. 30, 2018 begin research to determine the potential population of affected trailers. Dec. 6, 2018: File initial notice of defect on NHTSA portal</p>

Identify the Remedy
Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.

Describe what distinguishes the remedy component from the recalled component.
Identify and describe how and when the recall condition was corrected in production.

Identify the Recall Schedule

Describe the recall schedule for notifications.:

Planned Dealer Notification Begin Date:

Planned Dealer Notification End Date:

Planned Owner Notification Begin Date:

Planned Owner Notification End Date:

Manufacturer's identification code for this recall (if applicable):

Please be reminded that owner notification letters must be mailed no more than 60 days from submission of this report.

Manufacturer Comments to NHTSA Staff

Document Upload

There are 1 documents associated with this report.

1200 New Jersey Avenue, SE, West Building Washington DC 20590 USA 1.888.327.4236 TTY 1.800.424.9153
This application works best in IE9 and above and recent versions of Firefox, Chrome and Safari

Part 573 Safety Recall Report

18V-869

Manufacturer Name : Great Dane Trailers**Submission Date :** JAN 02, 2019**NHTSA Recall No. :** 18V-869**Manufacturer Recall No. :** NR**Manufacturer Information :**

Manufacturer Name : Great Dane Trailers

Address : 602 E Lathrop Avenue

Savannah GA 31415

Company phone : 912-232-4471

Population :

Number of potentially involved : 72

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2019-2019 Great Dane Freedom Platform Trailer

Vehicle Type : TRAILERS

Body Style : OTHER

Power Train : NR

Descriptive Information : A drawing change led to the certification plates being left off drop deck platform trailers. This continued until the error was noticed, and trailers still in production, or still on the manufacturing facility's yard were retrofitted prior to shipping.

Production Dates : JUL 10, 2018 - NOV 08, 2018

VIN Range 1 : Begin :

NR

End : NR

 Not sequential**Description of Noncompliance :**

Description of the Noncompliance : Certain 2018 model year platform trailers produced in the Huntsville TN manufacturing facility may have been produced without a rear impact certification plate.

FMVSS 1 : 223 - Rear impact guards

FMVSS 2 : 224 - Rear impact protection

Description of the Safety Risk : There is no safety risk. The rear impact guards meet the applicable certification standards, the certification plate was just not installed on the rear impact guards. Great Dane will be petitioning the agency since we believe this issue is inconsequential to motor vehicle safety.

Description of the Cause : NR

Identification of Any Warning that can Occur : NR

Supplier Identification :**Component Manufacturer**

Name : NR

Address : NR

NR

Country : NR

Chronology :

Nov. 29, 2018: During a company wide review of rear impact guard certification plate procedures it was discovered that the Huntsville manufacturing facility may have produced some quantity of platform trailers with nonexempt rear impact guards without certification plates affixed to the rear impact horizontal.

Nov. 30, 2018 begin research to determine the potential population of affected trailers.

Dec. 6, 2018: File initial notice of defect on NHTSA portal

Description of Remedy :

Description of Remedy Program : NR

How Remedy Component Differs
from Recalled Component : NRIdentify How/When Recall Condition
was Corrected in Production : NR**Recall Schedule :**

Description of Recall Schedule : NR

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported