

Part 573 Safety Recall Report

21E-037

Manufacturer Name : Full Vision, Inc.

Submission Date : APR 29, 2021

NHTSA Recall No. : 21E-037

Manufacturer Recall No. : NR



Manufacturer Information :

Manufacturer Name : Full Vision, Inc.

Address : 3017 Full Vision Drive
Newton KS 67114

Company phone : 316-283-3344

Population :

Number of potentially involved : 6

Estimated percentage with defect : 1 %

Equipment Information :

Brand / Trade 1 : Full Vision

Model : Rogers Brothers Rear Impact Guard

Part No. : 315-07010

Size : N/A

Function : Underride guard

Descriptive Information : Certain rear impact guards supplied to Rogers Brothers for installation as original equipment in Rogers Brothers' trailers. Full Vision Inc. (FVI) found that a shipment of steel from its supplier may have contained nonconforming steel, which, based upon a review of production records, may potentially have been used in the suspect population.

Production Dates : MAY 13, 2019 - MAY 16, 2019

Description of Noncompliance :

Description of the Noncompliance : Although materials reports for the steel that was likely used in the suspect population of rear impact guards indicate that the steel met Full Vision's specification, Full Vision cannot rule out the possibility that nonconforming steel may have been used to produce parts during this period. A rear impact guard using this nonconforming steel may not meet the strength requirements of FMVSS 223 S5.2.1.

FMVSS 1 : 223 - Rear impact guards

FMVSS 2 : NR

Description of the Safety Risk : A rear impact guard that does not meet the strength requirements of FMVSS 223 may not provide adequate protection to a light duty vehicle involved in an impact with a trailer equipped with the subject guard.

Description of the Cause : Full Vision could not rule out the use of nonconforming steel in the subject rear impact guards.

Identification of Any Warning N/A
that can Occur :

Involved Components :

Component Name : Steel Tube

Component Description : Steel Tube

Component Part Number : 006-1152

Supplier Identification :

Component Manufacturer

Name : Steel Ventures, LLC d/b/a EXLTUBE

Address : 1000 Burlington Street
North Kansas City Missouri 64116

Country : United States

Chronology :

- Feb. 1, 2021: FVI received an information request from NHTSA regarding compliance test results from MGA Research Corporation titled Report No. 223-MGA-20-001 conducted on May 26, 2020. According to the report, an FVI rear impact guard supplied to Rogers Brothers Corp. failed to meet the guard strength requirements in FMVSS 223 S5.2.1 at the P1 location on the right side of the guard.
- Feb. to Mar. 1, 2021: After reviewing the MGA test report, FVI collected and reviewed testing records, production records, and design documents to review the compliance testing for rear impact guards supplied to Rogers Brothers. FVI concluded that the last shipment of production parts was in December 2019.
- Mar. 2021 – Apr. 2021: FVI continued its investigation of the production records, material specification, the supplier's materials reports, and quality processes to evaluate the MGA test results.
- Apr 1 – Apr 21, 2021: FVI investigated the materials reports for steel that was used during the production period that included the suspect rear impact guards. This investigation indicated that a batch of steel that did not meet FVI's material specifications was received during the production period from which the rear impact guard used in MGA's testing was produced. Although FVI's investigation determined that the suspect population likely used conforming steel, FVI could not rule out the possibility that some of the nonconforming steel may have been used in rear impact guards produced during this time period.
- Apr. 22, 2021: Because FVI could not confirm that none of the nonconforming steel was used in the suspect population, out of an abundance of caution FVI made a noncompliance determination with respect to the subject rear impact guards.

FVI is not aware of any reports of injuries or property damage related to the rear impact guards.

Description of Remedy :

Description of Remedy Program :	The remedy program will be determined by the affected trailer manufacturer.
How Remedy Component Differs from Recalled Component :	Any replacement guards or parts will include steel conforming to FVI's material specification. FVI's part number for the steel tube in question is 006-1152.
Identify How/When Recall Condition was Corrected in Production :	After discovering the potential issue, FVI held training with all production personnel on the materials requirements and the importance of ensuring compliance with the materials specification. FVI also notes that it last manufactured a rear impact guard on May 16, 2019 and is no longer manufacturing rear impact guards.

Recall Schedule :

Description of Recall Schedule :	Any recall will be handled by the affected OEM.
Planned Dealer Notification Date :	NR - NR
Planned Owner Notification Date :	NR - NR

Purchaser Information :

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name :	Rogers Brothers Corp.
Address :	100 Orchard Street Albion PA 16401
Country :	US
Company Phone :	8147564121

* NR - Not Reported