OMB Control No.: 2127-0004

Part 573 Safety Recall Report

21V-177

Manufacturer Name: Charles Machine Works, Inc.

Submission Date: MAR 25, 2021 NHTSA Recall No.: 21V-177 Manufacturer Recall No.: NR



Manufacturer Information:

Manufacturer Name: Charles Machine Works, Inc.

Address: 1959 Fir Street

Box 66 Perry OK 73077

Company phone: 580-572-2223

Population:

Number of potentially involved : 456 Estimated percentage with defect : 100 %

Vehicle Information:

Vehicle 1: 2008-2020 Ditch Witch S4S

Vehicle Type: TRAILERS

Body Style : Power Train : NR

Descriptive Information: The trailer is designed specifically for carrying the FX20 vacuum excavator skid. One

trailer was inspected in factory inventory by the National Association of Trailer Manufacturers (NATM) in late 2020 and found to not meet the requirements per 49 CFR Part 571.108. Specifically, the trailer in inventory lacked side reflex reflectors or conspicuity tape near the front portion of the trailer. This same model of trailer was previously inspected by the NATM in 2017 and 2019, and found to be compliant both times. CMW has investigated whether this condition was isolated to the inventory unit, and has been unable to rule out that other subject trailers may have been produced and delivered without the required side reflex reflectors. Accordingly, CMW decided that, in an abundance of caution, it would determine the existence of a

non-compliance and notify NHTSA.

Because CMW has been unable to identify if and when the required side reflex reflectors were omitted on units that were delivered to customers, CMW will notify dealers and request them to stop sale, until they can inspect all trailers of this model in their inventories for the required reflectors or conspicuity tape and repair as necessary. CMW will also prepare a customer notification and provide it to NHTSA

RMD staff for review.

Production Dates: JUN 10, 2008 - APR 20, 2020

VIN Range 1: Begin: 1DSB141W381702427 End: 1DSB321WXL1700326 Not sequential

Vehicle 2: 2015-2021 Ditch Witch 025-1020

Vehicle Type: TRAILERS

Body Style: Power Train: NR

Descriptive Information: The trailer is designed specifically for carrying the FX20 vacuum excavator skid. One trailer was inspected in factory inventory by the National Association of Trailer Manufacturers (NATM) in late 2020 and found to not meet the requirements per 49 CFR Part 571.108. Specifically, the trailer in inventory lacked side reflex reflectors or conspicuity tape near the front portion of the trailer. This same model of trailer was previously inspected by the NATM in 2017 and 2019, and found to be compliant both times. CMW has investigated whether this condition was isolated to the inventory unit, and has been unable to rule out that other subject trailers may have been produced and delivered without the required side reflex reflectors. Accordingly, CMW decided that, in an abundance of caution, it would determine the existence of a non-compliance and notify NHTSA.

> Because CMW has been unable to identify if and when the required side reflex reflectors were omitted on units that were delivered to customers, CMW will notify dealers and request them to stop sale, until they can inspect all trailers of this model in their inventories for the required reflectors or conspicuity tape and repair as necessary. CMW will also prepare a customer notification and provide it to NHTSA

RMD staff for review.

Production Dates: JAN 16, 2015 - FEB 02, 2021

VIN Range 1: Begin: 1DSB141W1F1701712 End: 1DSB321W0W1700322 Not sequential

Vehicle 3: 2010-2010 Ditch Witch ZS6S-1

Vehicle Type: TRAILERS

Body Style: Power Train: NR

Descriptive Information: The trailer is designed specifically for carrying the FX20 vacuum excavator skid. One trailer was inspected in factory inventory by the National Association of Trailer Manufacturers (NATM) in late 2020 and found to not meet the requirements per 49 CFR Part 571.108. Specifically, the trailer in inventory lacked side reflex reflectors or conspicuity tape near the front portion of the trailer. This same model of trailer was previously inspected by the NATM in 2017 and 2019, and found to be compliant both times. CMW has investigated whether this condition was isolated to the inventory unit, and has been unable to rule out that other subject trailers may have been produced and delivered without the required side reflex reflectors. Accordingly, CMW decided that, in an abundance of caution, it would determine the existence of a non-compliance and notify NHTSA.

> Because CMW has been unable to identify if and when the required side reflex reflectors were omitted on units that were delivered to customers, CMW will notify dealers and request them to stop sale, until they can inspect all trailers of this model in their inventories for the required reflectors or conspicuity tape and repair as necessary. CMW will also prepare a customer notification and provide it to NHTSA

RMD staff for review.

Production Dates: JUL 09, 2010 - JUL 09, 2010

VIN Range 1: Begin: 1DSB141W5A1700961 End: 1DSB141W5A1700961 ☐ Not sequential

Vehicle 4: 2009-2019 Ditch Witch ZS6S

Vehicle Type: TRAILERS

Body Style : Power Train : NR

Descriptive Information: The trailer is designed specifically for carrying the FX20 vacuum excavator skid. One

trailer was inspected in factory inventory by the National Association of Trailer Manufacturers (NATM) in late 2020 and found to not meet the requirements per 49 CFR Part 571.108. Specifically, the trailer in inventory lacked side reflex reflectors or conspicuity tape near the front portion of the trailer. This same model of trailer was previously inspected by the NATM in 2017 and 2019, and found to be compliant both times. CMW has investigated whether this condition was isolated to the inventory unit, and has been unable to rule out that other subject trailers may have been produced and delivered without the required side reflex reflectors. Accordingly, CMW decided that, in an abundance of caution, it would determine the existence of a

non-compliance and notify NHTSA.

Because CMW has been unable to identify if and when the required side reflex reflectors were omitted on units that were delivered to customers, CMW will notify dealers and request them to stop sale, until they can inspect all trailers of this model in their inventories for the required reflectors or conspicuity tape and repair as necessary. CMW will also prepare a customer notification and provide it to NHTSA

RMD staff for review.

Production Dates: MAY 22, 2009 - NOV 20, 2019

VIN Range 1: Begin: 1DSB141W091700975 End: 1DSB321WXL1700312 Not sequential

Vehicle 5: 2015-2015 Ditch Witch 745-7900

Vehicle Type: TRAILERS

Body Style : Power Train : NR

Descriptive Information: The trailer is designed specifically for carrying the FX20 vacuum excavator skid. One

trailer was inspected in factory inventory by the National Association of Trailer Manufacturers (NATM) in late 2020 and found to not meet the requirements per 49 CFR Part 571.108. Specifically, the trailer in inventory lacked side reflex reflectors or conspicuity tape near the front portion of the trailer. This same model of trailer was previously inspected by the NATM in 2017 and 2019, and found to be compliant both times. CMW has investigated whether this condition was isolated to the inventory unit, and has been unable to rule out that other subject trailers may have been produced and delivered without the required side reflex reflectors. Accordingly, CMW decided that, in an abundance of caution, it would determine the existence of a non-compliance and notify NHTSA.

Because CMW has been unable to identify if and when the required side reflex reflectors were omitted on units that were delivered to customers, CMW will notify dealers and request them to stop sale, until they can inspect all trailers of this model in their inventories for the required reflectors or conspicuity tape and repair as necessary. CMW will also prepare a customer notification and provide it to NHTSA

RMD staff for review

Production Dates: APR 17, 2015 - APR 17, 2015

Description of Noncompliance:

Description of the The trailer is designed specifically for carrying the FX20 vacuum excavator Noncompliance : skid. One trailer was inspected in factory inventory by the National Association of Trailer Manufacturers (NATM) in late 2020 and found to not meet the requirements per 49 CFR Part 571.108. Specifically, the trailer in inventory lacked side reflex reflectors or conspicuity tape near the front portion of the trailer. This same model of trailer was previously inspected by the NATM in 2017 and 2019, and found to be compliant both times. CMW has investigated whether this condition was isolated to the inventory unit, and has been unable to rule out that other subject trailers may have been produced and delivered without the required side reflex reflectors. Accordingly, CMW decided that, in an abundance of caution, it would determine the existence of a non-compliance and notify NHTSA.

> Because CMW has been unable to identify if and when the required side reflex reflectors were omitted on units that were delivered to customers, CMW will notify dealers and request them to stop sale, until they can inspect all trailers of this model in their inventories for the required reflectors or conspicuity tape and repair as necessary. CMW will also prepare a customer notification and provide it to NHTSA RMD staff for review.

FMVSS 1: 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2: NR

Description of the Safety Risk: Potential crash hazard due to potentially missing side reflex reflectors.

Description of the Cause: The past was missing from a production unit that was inspected at the end of

2020. Some other units previously manufactured, however, were found to

have the part.

Identification of Any Warning NR

that can Occur:

Involved Components:

Component Name 1: AMBER SAE A DOT REFLECTOR

Component Description: reflector (amber)

Component Part Number: 270-8482

Component Name 2: RED SAE A DOT REFLECTOR

Component Description: reflector (red)

Component Part Number: 270-8483

Supplier Identification:

Component Manufacturer

Name: NR

Address: NR

NR

Country: NR

Chronology:

The trailer is designed specifically for carrying the FX20 vacuum excavator skid. One trailer was inspected in factory inventory by the National Association of Trailer Manufacturers (NATM) in late 2020 and found to not meet the requirements per 49 CFR Part 571.108. Specifically, the trailer in inventory lacked side reflex reflectors or conspicuity tape near the front portion of the trailer. This same model of trailer was previously inspected by the NATM in 2017 and 2019, and found to be compliant both times. CMW has investigated whether this condition was isolated to the inventory unit, and has been unable to rule out that other subject trailers may have been produced and delivered without the required side reflex reflectors. Accordingly, CMW decided that, in an abundance of caution, it would determine the existence of a non-compliance and notify NHTSA.

Because CMW has been unable to identify if and when the required side reflex reflectors were omitted on units that were delivered to customers, CMW will notify dealers and request them to stop sale, until they can inspect all trailers of this model in their inventories for the required reflectors or conspicuity tape and repair as necessary. CMW will also prepare a customer notification and provide it to NHTSA RMD staff for review.

Description of Remedy:

Description of Remedy Program: Dealers and customers to inspect for side reflex reflectors or conspicuity

tape near the front portion of the trailer. If not present, dealer will add

reflectors.

How Remedy Component Differs They are the same component.

from Recalled Component:

How/When Recall Condition The component is included in

Identify How/When Recall Condition The component is included in the bill of materials and has been added to was Corrected in Production: the end of the line inspection checklist, as well as the pre-ship audit

checklist.

Recall Schedule:

Description of Recall Schedule: The dealer channel will be notified today. The customer notification letter

will be sent once approved by NHTSA staff.

Planned Dealer Notification Date: MAR 18, 2021 - MAR 31, 2021

21V-177

Page 8

Planned Owner Notification Date: MAR 31, 2021 - MAR 31, 2021

* NR - Not Reported

The information contained in this report was submitted pursuant to 49 CFR §573