

Subject: Trailer Lighting in Compliance with Federal Motor Vehicle Standard No. 108 and Related Harnesses No Longer Available
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Due to a recent D.O.T. letter of interpretation of Federal Motor Vehicle Safety Standard (FMVSS) No. 108, *Lights, reflective devices, and associated equipment*, Utility Trailer Mfg. Co. can no longer provide light packages with greater than (5) lamps on the rear header or greater than (2) lamps on the front wall on VAN trailers or more than (2) stop/turn/tail lights per side on FLATBED models.

The Department of Transportation's letter of interpretation has forced us to remove many of the popular clearance light option packages on all models of trailers that will be manufactured after November 1, 2003.

The D.O.T. has stated in very specific language that the Identification Lamp cluster of three lights must not be surrounded by other lights that will *impair the effectiveness* of the (3) light Identification Lamp cluster.

On VAN trailers, we will no longer be able to install more than (5) clearance lights on the rear header. These (5) lights are the 3-light identification cluster and (1) clearance light on each outboard end of the header. (See Drawing 1 for details.) Note that the areas in-between the outboard clearance lights and the I.D. cluster on either side are no longer available for installation of additional lights.

In the case of FLATBED models, the outside stop/turn/tail light on the rear rail is the clearance light that indicates the overall width of the trailer. Adding additional Stop/Turn/Tail lights to the rear of FLATBED trailers is no longer allowed because the D.O.T. has ruled that those additional lights reduce the effectiveness of the 3-light Identification cluster.

Effective immediately, we will no longer quote or manufacture after November 1, 2003 any trailer that does not comply with this new policy. Future DQS Updates and TPO confirmations will reflect this change. In addition, we will issue OCN's to adjust any "Final" TPO's in our production backlog for trailers that have more than the allowable light quantities and are scheduled to be manufactured after November 1, 2003

It is our belief that the D.O.T. will be reviewing all trailer manufacturers for compliance to the newest interpretation of FMVSS 108.

It is important to also remind you that all *dealer or customer-installed* lights must also be in compliance with FMVSS 108. It is with that in mind that Utility's Aftermarket Parts Division **will no longer sell** van harnesses with plugs for more than the above (5) lamps on the rear header, or more than the (2) lamps on the front top rail.

Field Service Department
UTILITY TRAILER MANUFACTURING COMPANY

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Drawing 1 - Van Trailers

