B 6/15/88 pdg

1

Blackburn Engineering Co.
8222 Bruton Road
P.O. Box 17038
Dallas, Texas 75217

May 3, 1988

01-22-N11B-2978

ORIGINAL

3pgs

National Highway Traffic Safety Administration
VIN Coordinator
400 Seventh Street
S.W. Washington, D.C. 20590

Dear Sirs

I represent a client (Metro Fab Inc.) that wishes to build frame trailers that attach to specialized dump boxes that they presently attach to frame trailers that are manufactured by another company. In accordance with my client becoming a primary manufacturer we are submitting a Vehicle Identification Number identification system. The VIN system is as follows and shold conform to the Code of Federal Regulations 49 section 565.

The first, second and third digits are designated for the identification of the manufacturer and are respectively 4, 4 and Y.

The fourth digit signifies the Line of trailer which will be as follows.

1 = Frame Trailer
2 = Platform Trailer

The fifth digit specifies a frame configuration difference (model of trailer)

1 = Straight Frame Trailer w Grease Dump Box
2 = Drop Frame Trailer w Grease Dump Box
3 = Straight Frame Trailer only
4 = Drop Frame Trailer only
5 = Straight Frame platform
6 = Drop Frame platform
7 = Straight Frame Kit
8 = Drop Frame Kit

The sixth and seventh digits pertain to the length of the trailer in feet to the nearest foot within six inches. ie a 47'-7" trailer would have the sixth and seventh digits of 4 and 8 respectively.

Blackburn Engineering Co.
8222 Bruton Road
P.O. Box 17038
Dallas, Texas 75217

May 3, 1988

The eighth Digit pertains to the number of axles that are to be installed on the trailer.

1 = 1 Axle
2 = 2 Axles
3 = 3 Axles
4 = 4 Axles
5 = 5 Axles
6 = 6 Axles
7 = 7 Axles
8 = 8 Axles

The ninth digit is the check digit and shall be determined using the proceedure specified in the Code of Federal Regulations Title 49 Chapter 5 - National Highway Traffic Safety Administration, Department of Transportation. section 565.4. (49 CFR Ch 5 (10-1-87 Ed.) 565.4)

The tenth digit specifies the vehicle model year using a character specified in 49 CFR Ch 5 (10-1-87 Ed.) 565.4 .

The eleventh digit specifies the plant of manufacture. At this time my client only has one manufacturing facility but if he does decide to expand a revision to this VIN identification system will be submitted before the expansion occurs. The plant designation is as follows.

1 = Fort Worth, Texas Plant

The twelfth through the seventeenth digits shall be sequential manufacturing digits.

Note: My client estimates he will not manufacture more than 500 vehicles this year but he hopes to manufacture more than 500 vehicles/year in the future.

Example:

1st section			2nd section					3rd section	4th section							
Digit number																
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
==	==	==	==	==	==	==	==	==	==	==	==	==	==	==	==	==
4	4	Y	1	1	1	2	4	7	J	1	0	0	0	0	0	1

Also for your information the trailers to be manufactured shold have a GVWR of either 70,000lbs. or 80,000lbs..

2

Blackburn Engineering Co.
8222 Bruton Road
P.O. Box 17038
Dallas, Texas 75217

May 3, 1988

I believe that this should qualify as a valid VIN identification system. If this does not qualify please notify me (preferably by phone) at 817-483-9207 or by mail at 4905 Wild Holly Lane #1115 Arlington, Texas 76017. Please send written confirmation to Metro Fab Inc.
3701 N. Grove St.
Fort Worth, Texas 76106
Phone (817)-626-8821

Thank you very much,

Cy West Blackburn

Cy West Blackburn
Blackburn Engineering Co.

CWB/cwb