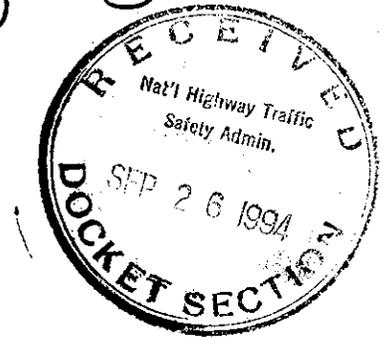


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01-22-N11B-5511

July 7, 1994

Penelope Johnson  
National Highway Traffic Safety Administration  
NRM-15, Rm 5307A  
400 7th St., SW  
Washington, DC 20590



**ORIGINAL**

RE: Submission of 49 CFR 565

Dear Ms. Johnson:

The coding used in the VIN scheme we will be using is as follows:

JP

**World Manufacturer Identifier, from SAE**

First Position: 1 (Assigned)  
Second Position: M (Assigned)  
Third Position: 9 (Assigned)

**Type of Trailer**

Fourth Position: A Standard Frame, Flat with ball hitch, Length 12 to 40 feet.  
B Non-standard Frame, Gooseneck etc.  
C Other type frames or connecting methods.

**Series or Body Type**

Fifth Position A Dry Freight Van Body, Insulated and non-insulated.  
B No Trailer Body Attached, Flat Bed.  
C Other, Screen, stake body, pipe rail.

**Length in Feet**

Sixth Position & Seventh Position Describes length of trailer main frame, excluding tongue and rear bumper or safety step. Normally in two foot increments.

**Number of Axles**

Eighth Position One, Two or Three axles.

**Check Digit**

Ninth Position                      See Check Digit Calculation Sheet

**Model Year**

Tenth Position                      See Model Year Table

**Plant Location**

Eleventh Position    C        Commerce City, CO

**Manufacturers Identifier**

Twelfth Position    0        (Assigned)

Thirteenth Position 0        (Assigned)

Fourteenth Position 8        (Assigned)

**Production Sequence**

Fifteenth Position                  Sequential Numbers assigned during production.

Sixteenth Position

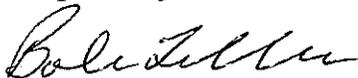
Seventeenth Position

Our production rate will probably never exceed 100 units per year. Our GVWR range will be 6,000 to 60,000. Most of units will be in the 10,000 to 14,000 lb. range.

Following is an example of check digit calculation to arrive at the character to appear in the ninth position of the VIN and our vehicle identification tag.

If you have any questions, or if any category needs further explanation, please do not hesitate to call at your earliest convenience.

Respectfully,



Bob Teller

ART/sv





MFD. BY MODEC, INC.

DATE OF MFG.  G.V.W.R.  LBS.

G.A.W.R.  AXLES  LBS. EACH WITH  
 TIRES  RIMS  P.S.I. COLD

THIS VEHICLE CONFORMS TO ALL APPLICABLE  
FEDERAL MOTOR SAFETY STANDARDS  
IN EFFECT ON THE DATE OF MANUFACTURE  
SHOWN ABOVE.

VEHICLE IDENT. NO.

VEHICLE TYPE: TRAILER

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