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Harbour
INDUSTRIES
High Performance Wire & Cable

March 28, 2001

National Highway Traffic
Safety Administration
Docket Management
Room PL-401
400 Seventh Street, SW
Washington, DC 20590

Docket No. NHTSA 2001-8677; Notice 1 RIN 2127-A125 - 54

Dear Sir or Madam:

In the Federal Register of January 22, 2001 the National Highway Traffic Safety Administration (NHTSA) published an Advanced Notice of Proposed Rulemaking (ANPR) requesting comments on ways in which NHTSA could implement the "early warning requirements" of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act.

Harbour Industries, Inc. (Harbour) is a manufacturer of wire and cable which may be used in the automotive industry but has broader uses. In fact, only a very small percentage of its production may be used in automotive applications. No direct sales to this industry are made by Harbour and no products are made to any automotive specifications.

Harbour submits that those manufacturers and products brought within the ultimate scope of a final regulation be limited in a manner reasonably related to the purposes of the law. Harbour believes that manufacturers of products which may be used in many applications and industries, and which are not designated specifically for automotive use, be expressly excluded from the regulation.

In many cases, these companies may not even know that their product has automotive applications and do not sell directly into that industry.

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A member of The Marmon Group of companies

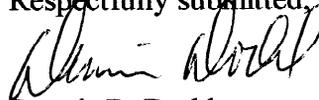
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The burden which would be imposed on such businesses establishing an early warning system would substantially outweigh any potential benefit. Such companies are unlikely to identify an automotive related problem and any safety-related issues are likely to come to the attention of the manufacturer of a component made specifically for automotive use or the vehicle manufacturer rather than those who produce products not made for industry-specific purposes.

Therefore, Harbour Industries, Inc. respectfully submits that manufacturers of multi-use bulk components should be excluded from the scope of the regulation.

We appreciate the opportunity to comment on the ANPR.

Respectfully submitted,



Dennis R. Dodd
President