

419 West Pike Street, PO Box 629, Jackson Center, OH 45334-0629

January 11, 2013

**VIA E-MAIL
RECEIPT CONFIRMATION REQUESTED**

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
1200 New Jersey Ave. S.E.
Washington, DC 20590

Re: Goshen Coach
Defect and Non-Compliance Report

Dear Ms. Lewis:

Goshen Coach (Goshen) has been notified by Ricon Corporation (Ricon) concerning a safety defect involving wheelchair lifts built between August 1, 2006 and September 29, 2012. Ricon has already initiated a safety recall campaign with respect to this defect. NHTSA has assigned recall number 12E-038 to the Ricon recall campaign.

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, we are hereby notifying the National Highway Traffic Safety Administration that certain buses manufactured by Goshen were built with Ricon wheelchair lifts that contain the defect.

As more specifically set forth below, Ricon has agreed to conduct the recall campaign involving these defective wheelchair lifts. Goshen will provide Ricon with a list of dealers and owners to assist Ricon in remedying the defect. Ricon will be filing the quarterly reports in connection with the recall campaign.

- A. Recall Population and Vehicle Identification. The recall population includes the following product brands manufactured by Goshen.

<u>Product Brand</u>	<u>Model Years</u>
GC II	2006-2012
GC II – 550	2007-2009
G-Force	2011-2012
Pacer	2006-2012
Pacer LS	2008,2010,2013
Pacer LTD	2012
Sentinel	2011

The total number of vehicles subject to this recall campaign is: 342.
These vehicles were built between October 13, 2006 and November 5, 2012.

- B. Description of Defect. The vehicles subject to this recall campaign were manufactured with the defective wheelchair lifts. Ricon has decided that the affected

lifts are equipped with a hand held pendant control where upon the cord is protected by a flexible, steel conduit (an armored pendant cable) and an external power lug at the base of the hydraulic pump. In the event the lift is installed such that the armored pendant cable is not managed to be kept clear of the wheelchair lift and the protective, elastomeric cover is either omitted or improperly installed, the armored pendant cable may contact the power lug resulting in a high current short circuit and possibly resulting in a fire.

- C. Basis for Determining that a Defect Exists. Goshen was notified by Ricon of the defect via a letter dated November 19, 2012. There have been no reports of accidents or personal injury as a result of this defect on any Goshen vehicles.
- D. Remediying of Defect. As outlined in the Ricon recall 12E-038 the remedy is to provide instructions on managing the pendant cord and supply a supplemental cover kit.
- E. Owner Notifications. Ricon on behalf of Goshen will notify the owners of the buses. A Copy of the letter is attached for approval.
- F. Quarterly Reporting Requirements. Ricon will be responsible for filing quarterly reports in connection with recall campaign 12E-038. Because the information included by Ricon in its quarterly reports will encompass the remediying of the Goshen buses subject to this recall campaign, Goshen will not file quarterly reports to avoid duplication.
- G. Campaign Number. Goshen does not have an internal campaign number for this recall. Goshen will use the recall campaign number assigned by NHTSA.

The enclosed information should comply with the NHTSA regulations and satisfy the obligations of Goshen with respect to this recall campaign. If you need any additional information regarding the participation of Goshen in this recall campaign, please feel free to contact David Mihalick at 937-596-7965 or Fred Schimmel, Goshen at 574-970-6701.

Sincerely,



David M. Mihalick
Thor Industries
Standards Compliance Manager