

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

January 8, 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: Eldorado National - Kansas  
Defect and Non-Compliance Report

Dear Ms. Lewis:

Eldorado National – Kansas (Eldorado) 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 Eldorado 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. Eldorado 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 Eldorado.

<u>Product Brand</u>	<u>Model Years</u>
Aerotech 240	2012

The total number of vehicles subject to this recall campaign is: 21.  
These vehicles were built between May 2012 and October 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. Eldorado 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 Eldorado vehicles.
  - D. Remedying 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 Eldorado 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 remedying of the Eldorado buses subject to this recall campaign, Eldorado will not file quarterly reports to avoid duplication.
  - G. Campaign Number. Eldorado does not have an internal campaign number for this recall. Eldorado will use the recall campaign number assigned by NHTSA.

The enclosed information should comply with the NHTSA regulations and satisfy the obligations of Eldorado with respect to this recall campaign. If you need any additional information regarding the participation of Eldorado in this recall campaign, please feel free to contact David Mihalick at 937-596-7965 or Bernie Regnier, Eldorado at 785-827-1033.

Sincerely,



David M. Mihalick  
Thor Industries  
Standards Compliance Manager