



U.S. Department  
of Transportation

1200 New Jersey Avenue, SE.  
Washington, DC 20590

**National Highway  
Traffic Safety  
Administration**

*August 12, 2008*

MR. JOE LABONTE  
COMPLIANCE AND SAFETY OFFICER  
DAIMLER BUSES NORTH CAROLINA  
350 HAZELHURST ROAD  
MISSISSAUGA, ONTARIO, CANADA 00 L5J 4T8

NVS-215dgl  
08V-387

Subject: ANTI-STOW INTERLOCK/FMVSS 403/RICON

Dear MR. LABONTE:

This letter serves to acknowledge Daimler Buses North Carolina's (Daimler Buses) notification to the National Highway Traffic Safety Administration (NHTSA) of a noncompliance with Federal Motor Vehicle Safety Standard No. 403, "Platform Lift Systems For Motor Vehicles," in the products described below, for which a safety recall campaign shall be conducted pursuant to 49 U.S.C. § 30119.

Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**

SPRINTER/2500/2004-2008  
SPRINTER/3500/2004-2008

**NHTSA Campaign Number:** 08V-387

**Mfg's Report Date:** July 23, 2008

**Components:** EQUIPMENT ADAPTIVE

**Potential Number of Units Affected:** 465

**Summary:**

DAIMLER BUSES IS RECALLING 465 MY 2004-2008 SPRINTER 2500 AND 3500 BUSES EQUIPPED WITH RICON PLATFORM STYLE WHEELCHAIR LIFTS. THE LIFTS FAIL TO COMPLY WITH THE REQUIREMENTS OF FEDERAL MOTOR VEHICLE SAFETY STANDARD NO. 403, "PLATFORM LIFT SYSTEMS FOR MOTOR VEHICLES." THE ANTI-STOW INTERLOCK MAY NOT DETECT THE PRESENCE OF A WHEELCHAIR OR MOBILITY AID USER. THE PRESSURE SENSING SWITCH THAT DETECTS THE PRESENCE OF WEIGHT ON THE PLATFORM WAS NOT ADJUSTED TO THE NECESSARY SENSITIVITY LEVEL. THE LIFT COULD STOW EVEN THOUGH SOMEONE OR SOMETHING IS STILL ON THE LIFT.

**Consequence:**

A LIFT OCCUPANT CAN BE INJURED SHOULD THE LIFT BEGIN TO STOW UNINTENTIONALLY.

**Remedy:**

DAIMLER BUSES IS WORKING WITH RICON TO CORRECT THE WHEELCHAIR LIFTS (PLEASE SEE 07E097). OWNERS MAY CONTACT RICON AT 1-818-267-3000 OR DAIMLER BUSES AT 1-905-403-7807.

**Notes:**

CUSTOMERS MAY ALSO CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S VEHICLE SAFETY HOTLINE AT 1-888-327-4236 (TTY 1-800-424-9153), OR GO TO [HTTP://WWW.SAFERCAR.GOV](http://www.safercar.gov).

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

The information in your noncompliance report appears to satisfy the requirements of 49 CFR 573.6 except for the following items:

Federal law requires that the vehicle manufacturer notify owners, dealers and distributors about the defect and offer a free remedy as well as other things. Also, manufacturers are required to submit a draft of their owner notification letter to the Recall Management Division at least 5 days prior to mailing it to owners, and to submit a representative copy of any communication about the recall that is sent to more than one owner, dealer or distributor within 5 days of mailing it. The owner notification must be mailed to current registered owners using State motor vehicle registration records, or, if State registration records fail to yield a usable address, to the most recent owner known to the manufacturer. The vehicle manufacturers must notify their dealers even though they may not be involved in this recall, since owners may contact them for information.

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in your report, Ricon will be handling the remedy and quarterly reporting for this campaign. However, please be advised that 49 CFR 573.6 provides that the vehicle manufacturer is responsible for any safety related defect or any noncompliance in the vehicle or any item of original equipment. If Ricon's campaign is not satisfactory, you may be required to conduct a follow-up notification.

Your contacts for this recall will be Pat Wallace or Delia Lopez, who may be reached by phone at 202-366-5232 or 202-366-9525, by email at [Patricia.wallace@dot.gov](mailto:Patricia.wallace@dot.gov), [Delia.lopez@dot.gov](mailto:Delia.lopez@dot.gov), or through the office email at [RMD.ODI@dot.gov](mailto:RMD.ODI@dot.gov). We look forward to working with you for successful completion of this recall campaign.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Person", written in a cursive style.

George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement