



Timothy J. Nalepka
Senior Vice President & General Counsel

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March 26, 2010

BY EMAIL AND
BY CERTIFIED MAIL

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS – 215)
1200 New Jersey Avenue, SE.
Washington, DC 20590

Re: AMENDED PART 573 NOTICE RE RICON WHEELCHAIR LIFT
NHTSA # 10V-087

Dear Sir or Madam:

After filing its initial Part 573 Defect and Noncompliance Report in this matter, Motor Coach Industries, Inc. (“MCI”) determined that there were additional vehicles that should have been included in the recall population, as well as certain vehicles that should not have been included, resulting in a new overall total recall population of 4,457 vehicles. Accordingly, I have enclosed MCI’s Amended Part 573 Defect and Noncompliance Report, proposed revised customer notification letter, draft Service Bulletin 341B, and sample envelope and mailing label to be used with the customer notification letters.

Please confirm receipt of this notice, and advise if the proposed revised customer notification letter, draft Service Bulletin 341B, and sample envelope and mailing label are satisfactory.

Thanks for your assistance with this matter.

Sincerely,
MOTOR COACH INDUSTRIES, INC.

By: Timothy J. Nalepka
Senior Vice President &
General Counsel

Enclosures

c: Sonny Murianka (by email, w/ encls.)

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report

On January 19, 2010 Motor Coach Industries, Inc. decided that a defect which relates to motor vehicle safety exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: **March 3, 2010** Amended March 26, 2010

Furnish the manufacturer's identification code for this recall (if applicable):

MCI Service Bulletin 341B

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

**Motor Coach Industries, Inc.
1700 E. Golf Road
Suite 300
Schaumburg, IL 60173**

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

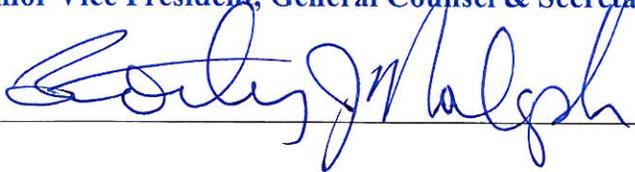
Bryan Couch, Vice President & General Manager of Operations

Telephone Number: **(204) 287-4447** Fax No.: **(204) 478-2867**

Name and Title of Person who prepared this report.

**Timothy J. Nalepka
Senior Vice President, General Counsel & Secretary**

Signed: _____



I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

All D series models equipped with a Ricon Wheelchair Lift (WCL) and a cassette-type WCL compartment door.

Make(s): MCI

- Model Years and Models Involved:
1. 1995 thru 2009 D4000
 2. 1997 thru 2010 D4500
 3. 2005 thru 2010 D4505

Production Dates:

1. 1995 thru 2009 D4000 Beginning: November 1994 Ending: February 2009
2. 1997 thru 2010 D4500 Beginning: November 1996 Ending: November 2009
3. 2005 thru 2010 D4505 Beginning: May 2005 Ending: December 2009

VIN Range:

1. 1995 thru 2009 D4000 Beginning: 46974 Ending: 58917
2. 1997 thru 2010 D4500 Beginning: 49205 Ending: 59260
3. 2005 thru 2010 D4505 Beginning: 56709 Ending: 59301

46974 – 46975	47096	47172	47453	47468
47523	47809	47864	47870	47905
48070	48281	48363 – 48364	48490	48883
49016	49205 – 49207	49221	49532	49558 – 49559
49626	49633	49706 – 49708	49815	50181 - 50182
50283	50505 – 50506	50797	50803	50868 – 50870
50881 – 50882	50917	50919	51319	51540
51590	52022	52068 – 52070	52163	52306
52331	52416 – 52417	52419	52423	52502
52508	52932 – 52933	52944	52988	52993

53046	53053	53078 – 53085	53088	53222
53226	53228 – 53244	53247	53250 – 53251	53253
53255 – 53258	53260 – 53261	53263 – 53273	53276 – 53286	53327 – 53331
53343 – 53356	53360 – 53361	53364 – 53393	53398	53404
53408	53411	53414	53417	53419
53424 – 53425	53427	53429 – 53431	53433 – 53435	53437 – 53454
53457 – 53464	53466 – 54370	53472 – 53476	53478 – 53482	53484 – 53488
53490 – 53494	53496 – 53500	53502 – 53504	53520 – 53544	53546 – 53550
53552 – 53556	53558 – 53562	53564 – 53568	53570 – 53574	53576
53578 – 53579	53581	53583	53585	53587
53589	53595	53597 – 53600	53602 – 53606	53608 – 53612
53614 – 53618	53620 – 53624	53626 – 53630	53632 – 53636	53638 – 53642
53644 – 53648	53650 – 53654	53656 – 53660	53662 – 53666	53668 – 53672
53674 – 53690	53692 – 53708	53710 – 53720	53722 – 53746	53748 – 53752
53760 – 53761	53764 – 53977	53995 – 54051	54054	54061 – 54064
54100 – 54110	54112 – 54145	54166 – 54261	54263 – 54282	54290
54292 – 54301	54306 – 54396	54398 – 54404	54414	54425 – 54429
54431 – 54438	54440 – 54443	54445 – 54448	54450 – 54453	54455 – 54462
54464 – 54467	54469 – 54472	54474 – 54477	54479 – 54483	54485 – 54488
54490 – 54493	54495 – 54498	54500 – 54507	54509 – 54512	54513
54514 – 54517	54519 – 54522	54524 – 54674	54676 – 54679	54681 – 54683
54686 – 54693	54695 – 54698	54700 – 54703	54705 – 54758	54760 – 54766
54769 – 54861	54866 – 54914	54916	54922	54928 – 55011
55012	55013 – 55017	55023	55028	55035 – 55088
55089 - 55091	55096 – 55153	55155 – 55161	55163 – 55363	55365 – 55403
55405 – 55416	55418 – 55443	55454 – 55455	55457 – 55460	55462 – 55465
55467 – 55504	55519 – 55594	55596 – 55605	55606	55607 – 55637
55638	55639 – 55643	55644	55645 – 55689	55691 - 55692
55694	55695 – 55754	55757 – 55763	55764 - 55765	55771 – 55773
55775 – 55777	55781 – 55838	55839 - 55840	55848	55852 – 55853
55856	55859	55864 – 55870	55873 – 55928	55929 - 55930
55932 – 55937	55939	55940	55944 – 55950	55953 – 55957
55958	55960 – 55961	55963 – 56031	56035 – 56110	56114 – 56116
56118 – 56120	56122 – 56123	56125 – 56127	56129 – 56130	56132 – 56133
56135 – 56137	56139 – 56140	56142 – 56163	56165 – 56184	56186 – 56199
56201 – 56219	56222 – 56311	56314 – 56328	56330 – 56350	56352 – 56364
56374 – 56405	56413 – 56435	56440 – 56450	56452	56455 – 56491
56497 – 56521	56525 – 56537	56539 – 56553	56555 – 56577	56579 – 56583
56591 – 56598	56600 – 56661	56663 – 56707	56709 – 56713	56723 – 56742
56758 – 56759	56766 – 56767	56773 – 56775	56784 – 56785	56795
56808 – 56811	56818 – 56892	56901 – 56902	56906 – 56925	56927 – 56930
56942 – 56996	56998 – 57000	57002 – 57004	57006 – 57008	57010 – 57012
57014 – 57015	57017	57020	57022	57035
57037 – 57038	57055	57061 – 57063	57067 – 57069	57072 – 57145
57147 – 57192	57200 – 57202	57219 – 57225	57227 – 57242	57244 – 57254

57256 – 57328	57331	57334 – 57340	57345 – 57352	57380 – 57404
57406 – 57416	57419 – 57428	57430 – 57433	57443 – 57444	57450 – 57513
57519 – 57520	57530 – 57533	57536 – 57549	57572 – 57609	57617 – 57696
57699 – 57703	57706 - 57707	57709	57713	57727 – 57734
57739 – 57741	57743 – 57744	57765 – 57813	57820 – 57836	57872 – 57884
57900 – 57917	57919 – 57949	57981	57989 – 58145	58159 – 58168
58171 – 58184	58188 - 58190	58197 – 58219	58221 – 58264	58278 - 58283
58285 – 58288	58322	58324	58326	58329
58331	58334	58336	58352 – 58354	58372
58373 – 58378	58379 - 58382	58383 – 58391	58430 - 58434	58479 – 58486
58492 – 58494	58508 – 58509	58511	58513 – 58521	58523
58534 – 58535	58550 - 58557	58590 – 58599	58601 – 58607	58608 – 58610
58611 – 58674	58678	58680 – 58684	58685 – 58686	58687 – 58688
58690 – 59691	58692 – 58694	58696 – 58706	58708	58710
58712	58714 – 58716	58720 – 58731	58741	58743
58746	58752	58775 - 58777	58811 – 58829	58838 – 58840
58861 – 58862	58879	58887 – 58889	58909	58911
58913	58915	58917	58949 – 58950	58961 - 58979
58992	59027 – 59046	59051 - 59052	59064 – 59069	59080
59092 – 59127	59130 – 59132	59256 – 59260	59270	59276 – 59280
59300 – 59301				

Descriptive information which characterizes /distinguishes the recalled vehicles from those model vehicles not included in the recall:

The recalled vehicles have a narrow, secondary opening (the “cassette door”) within the WCL compartment door. The cassette door is located at the bottom of the compartment door and is covered by a bottom-hinged, top-latched panel. The WCL compartment door is the #2 curb-side baggage compartment door. Coaches having a blank #2 curb-side baggage compartment door (i.e., no cassette door) are not affected by the recall, even if they are equipped with a Ricon WCL.



Figure 1Cassette door in #2 baggage bay door

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

The recall population is approximately ~~69~~ 36% of the total D series coach population produced during the model years referenced above.

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

<u>MODELS</u>	<u>MODEL YEARS</u>	<u>NUMBER OF VEHICLES POTENTIALLY INVOLVED</u>
<u>D4000</u>	<u>1995</u>	<u>7</u>
<u>D4000</u>	<u>1996</u>	<u>10</u>
<u>D4000</u>	<u>1997</u>	<u>8</u>
<u>D4000</u>	<u>1998</u>	<u>6</u>
<u>D4000</u>	<u>1999</u>	<u>2</u>
D4000	2000	33 <u>36</u>
D4000	2001	388
D4000	2002	569 <u>573</u>
D4000	2003	158 <u>161</u>
D4000	2004	24
D4000	2005	2
D4000	2006	4
D4000	2007	7
D4000	2009	9
<u>D4500</u>	<u>1997</u>	<u>6</u>
<u>D4500</u>	<u>1998</u>	<u>8</u>
<u>D4500</u>	<u>1999</u>	<u>8</u>
D4500	2000	28 <u>48</u>
D4500	2001	396 <u>397</u>
D4500	2002	365 <u>370</u>
D4500	2003	492 <u>513</u>
D4500	2004	229 <u>230</u>

D4500	2005	312 310
D4500	2006	382 379
D4500	2007	342 330
D4500	2008	279 280
D4500	2009	104
D4500	2010	5
D4505	2005	1
D4505	2006	48
D4505	2007	79
<u>D4505</u>	<u>2008</u>	<u>64</u>
<u>D4505</u>	<u>2009</u>	<u>32</u>
<u>D4505</u>	<u>2010</u>	<u>8</u>

Total Number Potentially Affected by the Recall: 4,256 4,457

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

The lack of a secondary locking mechanism in the Ricon WCL exists in all 4,256 4,457 vehicles noted in section II.3.

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

The recall population was selected by determining the two conditions that are necessary for the described potential failure to occur: (1) a Ricon WCL, and (2) a cassette door in the # 2 curb-side baggage compartment door.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The Ricon WCL is stowed in a storage structure mounted to the floor in baggage bay #2. In at least two circumstances of which MCI is aware (discussed further below), the Ricon WCL may become disengaged from a locked position and slide unrestrained on its rollers in the storage structure, potentially breaking through the cassette door and extending beyond the outside of the door when the coach is in motion, particularly when the coach is making a left turn.

Describe the cause(s) of the defect or noncompliance condition.

Normally, the Ricon WCL is deployed and stowed by means of an electric drive motor and a mechanical chain driven track/roller system. In this operating mode, the engagement of the drive motor to the mechanical drive mechanism is designed by Ricon to hold the WCL in position. A sprocket and chain arrangement connects the drive motor to an output driveshaft through an intermediate shaft. A primary drive chain with two sprockets connects the drive motor to the intermediate shaft, and a final drive chain with two sprockets connects the intermediate shaft to the output driveshaft. All of the sprockets are secured to their respective shafts by roll pins. When the output driveshaft rotates, pinion gears connected to each end of the shaft rotate on gear racks, which cause the WCL to move in or out of the structure. The WCL rolls on two rollers located on each side of the WCL.

MCI has become aware of instances in which the Ricon WCL experiences a failure of the roll pin that Ricon designed to secure the primary drive chain sprocket to the intermediate shaft. If this occurs, the output driveshaft is no longer connected to the drive mechanism and the WCL can then move freely in or out of the structure due to the lack of a secondary locking mechanism in the Ricon WCL design.

A second potential failure mode in the Ricon WCL is when the operator deploys the WCL manually. The WCL is equipped with provisions for manual operating mode, to be applied in instances when coach power is not available. In manual mode, the operator must disengage the mechanical drive mechanism by rotating a release shaft. This action disengages the output driveshaft pinion gears from the gear rack so that the operator can pull and push the WCL out of and into the storage structure manually. Normally when the operator manually stows the lift, the drive mechanism re-engages automatically. This automatic engagement occurs when a pin connected to the release shaft moves over a reset ramp that rotates the release shaft and re-engages the driveshaft pinion gears to the gear rack. If the reset ramps are not adjusted properly or if the pin is broken, the drive mechanism may not re-engage and the WCL will be able to move freely in or out of the structure due to the lack of a secondary locking mechanism in the Ricon WCL design.

If either of the two foregoing failure modes occur, the Ricon WCL may slide unrestrained on its rollers in the storage structure, potentially breaking through the cassette door and extending beyond the outside of the door when the coach is in motion, particularly when the coach is making a left turn.

Describe the consequence(s) of the defect or noncompliance condition.

If the Ricon WCL breaks through the cassette door and extends outside the side of the coach while the coach is in motion, potential injury to persons and/or damage to other vehicles or property could occur.

Identify any warning which can (a) precede or (b) occur.

If the Ricon WCL becomes unrestrained as a result of one of the failure modes discussed above, operators conducting normal pre-trip and post-trip inspections would be able to

observe the condition by manually attempting to slide the WCL. Operators may also become aware of audible and/or visual indicia of the WCL striking the cassette door prior to the WCL lift actually breaking through the cassette door.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Ricon Corporation
7900 Nelson Road
Panorama City, Calif. 91402

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

VP, Marketing & Product Planning - Stanton Saucier

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principal events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

In November 2007, a customer reported that a WCL had unexpectedly deployed while the coach (VIN 56959) was in motion. The customer advised that the WCL had broken through the cassette door, extended outward past the door, and struck a telephone pole. MCI was further advised that the roll pins on the WCL were both broken.

In July 2008, a customer reported a similar unintended WCL deployment involving coach 57903. Anecdotal reports indicated that the driver may have had electrical problems with the WCL and had to operate the coach in manual mode. The roll pins were not broken.

In November 2009, a customer reported a similar unintended WCL deployment involving coach 57652, and that the roll pins on the WCL were both broken.

MCI received partial, unconfirmed information regarding three other claimed unintended WCL deployments.

MCI had several discussions with Ricon concerning the reported instances of failures of the Ricon roll pins and unintended deployments of the Ricon WCL, and the lack of a secondary locking mechanism in the Ricon WCL design. As a result of those discussions and MCI's investigation, MCI decided in January 2010 to conduct a recall of the affected coaches in order to install a spring-loaded lock mechanism designed by Ricon as a retrofit (see section V.8. below).

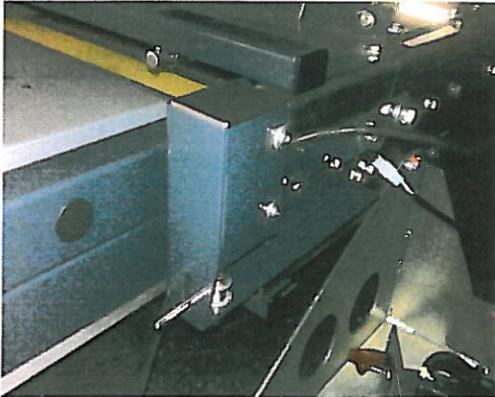
7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

N/A

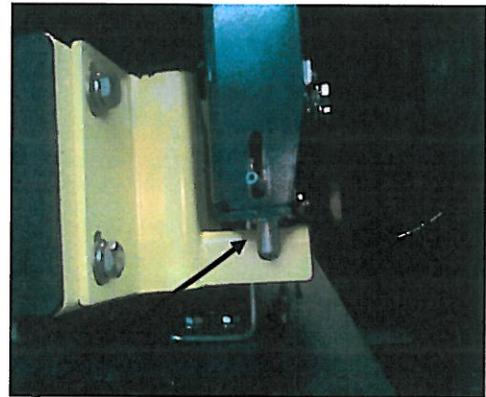
V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

MCI will provide the parts and labor to install, at no cost to customers, a Ricon-designed retrofit kit that includes a spring-loaded lock mechanism. The mechanism can be activated electrically or manually, but will always return to the "locked" position without power or without the operator holding it in the "unlocked" position. The additional lock mechanism will prevent unintended WCL deployments regardless of cause.



Current Lock Mechanism



New Spring Loaded Lock.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

See prior response.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The production remedy is identical to the field remedy, and was implemented with production of coach 59346.

VI. Identify the Recall Schedule

9. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please identify any foreseeable problems with implementing the recall.

MCI anticipates sending notifications to customers within one week after receiving approval by NHTSA of MCI's draft customer notification.

VII. Furnish Recall Communications

10. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

Please see the attached proposed customer notification letter and Service Bulletin 341B.

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.