

10V-148
(8 pages)

Barry Wolff
Director of Risk Management
631W 11th Street
Winamac, IN 46996 USA
Phone: (574) 946-6153 ext. 3024
(800) 946-7513
Fax: (574) 946-2341
Email: barry.wolff@braunlift.com

www.braunmobility.com

 **THE BRAUN CORPORATION**
"Providing Access to the World"



April 9, 2010

Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.
Washington, DC 20590



Re: Recall of Braun manufactured handicapped accessible mobility vehicles
Ref. NHTSA Campaign Number:

Dear Mr. Smith:

Pursuant to 49 CFR Part 573, we are submitting the enclosed Defect and Noncompliance Report. Attached are drafts of the proposed Dealer notification letter, and the proposed notification to the end user. In addition, I have included our Safety Recall Notice Service Bulletin.

Our Director of Product Support, Mr. Rick Nelson will be coordinating the recall campaign in the event you or your staff needs to speak with him. He may be reached at 1-800-946-7513, extension 3272.

Sincerely,

Barry E. Wolff

Barry E. Wolff
Director of Risk Management

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

On April 9, 2010, The Braun Corporation 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 Responsibility and Reports.

Date this report was prepared: **April 9, 2010**

Furnish the manufacturer's identification code for this recall: **N/A**

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:

The Braun Corporation

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

Rick Nelson
Director of Product Support

Telephone Number: **1-800-946-7513 Extension 3272**
Fax Number: **574-946-3143**

Name and Title of Person who prepared this report:

Barry Wolff
Director of Risk Management

Signed: Barry E. Wolff

I. Identify the Vehicle Models Involved in this Recall

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

Make(s): **Chrysler Corporation**

Model Years Involved: **2008-2010**

Model(s): **Chrysler Town & Country/Dodge Caravan**

Production Dates: Beginning: **January 21, 2009**
Ending: **March 19, 2010**

Chrysler VIN Range: Beginning: **2A8HR44H78R811708**
Ending: **2A4RR4DE0AR153683**

Dodge VIN Range: Beginning: **2D8HN44E69R560269**
Ending: **2D8HN44H88R732343**

Vehicle Type: **Low floor minivan**

Bodystyle: **Commercial ADA Entervan**

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall. **N/A**

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: **100 percent.**

II. Identify the Recall Population

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

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
--------------	-------------	--

Chrysler Town & Country	2008-2010	35
Dodge Caravan	2008-2010	799

Total Number Potentially Affected by the Recall: **834**

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: **Less than 1 percent.**

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 items of equipment:

The recall population was determined to be all handicapped accessible, body raised ADA low floor minivan conversions built on a Chrysler minivan chassis. The beginning date was determined to be the date on which the first 2008 model Commercial ADA Entervan was manufactured. The final date was determined to be the date the design was changed to implement the fuel fill pipe restraint strap remedy.

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.

During conversion, the chassis is raised and the floor is lowered to accommodate wheelchair accessibility features. This allows the required Americans with Disabilities Act doorway head clearance to be achieved. In raising the chassis, the fuel pipe comes into closer proximity to the left rear tire. In rough or aggressive driving situations the tire may intermittently contact the fuel pipe.

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

The cause results from the fact that the chassis is raised.

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

The consequence of the defect is that tire/fuel pipe contact may wear a hole in one or the other components over time. This may result in loss of vehicle control in the event of tire pressure loss, or a vehicle fire in the event the fuel pipe is compromised.

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

A driver may hear a rubbing, scraping, or grinding noise emanating from the left rear of the vehicle.

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

N/A

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

N/A

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 principle 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.

On January 27, 2010, Braun received communication from one of its mobility dealers who stated that he noticed the left rear tire rubbing the fuel fill pipe. The mobility dealer simply pushed the fuel fill pipe out of the path of the tire to eliminate the interference. Subsequent to the initial finding, Braun was later noticed in March, 2010, that a transit agency was experiencing similar symptoms with several of their Braun vehicles. Based on these instances, Braun initiated an internal

investigation and later discovered the chassis raise was contributing to the tire/fuel pipe interference. The symptoms include unusual noises emanating from the left rear of the vehicle. To date, there have been no reports of injuries, or fatalities.

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. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred the costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

Braun will notify our dealer network of this event which will include the remedy procedure. Braun will provide our dealer network a supply of remedy parts to have on hand to reduce the wait time for our end user customers. Once this notification to our dealer network is complete, we will mail the end user notifications one week afterward using first class U.S. mail service. The Braun Corporation will enlist the services of a professional mailing service to send the notifications to our dealer network and the end user customers. These notifications will be sent first class U.S. mail.

Braun will reimburse our dealers one hour labor to apply the remedy. Our dealer network will use a recall reimbursement program located on

our website to reduce administrative effort and increase reporting accuracy.

We will supply a toll free phone number for the end user customers to ask questions concerning this recall.

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

See the attached Service Bulletin. The recall condition lacks the fuel pipe strap remedy required by the recall.

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

See the attached Service Bulletin.

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 recall condition was corrected in production on March 19, 2010. Additionally, many undelivered units still under our control had the remedy applied. This took the form of implementing the fuel pipe strap as depicted in the attached Service Bulletin. The production remedy is identical to the recall remedy.

VI. Identify the Recall Schedule

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.

The Braun Corporation anticipates the recall campaign will begin during April, 2010. At that time, Dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population. Also, end users will begin to be notified regarding

the recall. The only foreseeable problem centers on our ability in identifying end users, as their identities are only known if they submitted a warranty registration card to The Braun Corporation. We will work closely with Dealers to identify end users who are unknown to us. We will also enlist the registration services of RL Polk to help identify current vehicle owners.

VII. Furnish Recall Communications

9. 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) or by E-mail to RMD.ODI@dot.gov for review prior to mailing.*

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

See the attached proposed recall communications.