



Ricon Corporation  
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September 28, 2010

Mr. Alex Ansley  
US DOT- NHTSA  
Office of Defects Investigation  
Recall Management / W46-412  
1200 New Jersey Ave SE  
Washington, DC 20590

Subject: Motor Coach Industries Recall 10V-087 Related to Inadvertant Wheelchair Lift Deployment

Dear Mr. Ansley:

Please be advised that Ricon does not intend to submit an Equipment Defect Report for wheelchair lifts that allegedly might experience a roll pin failure because this potential failure mode has already been foreseen and is reflected in our installation policy.

Since the Mirage lift was originally introduced in the mid 1990's, it has been Ricon's policy that the lift be installed with a secondary locking device or behind a mechanically lockable door in the event of the operator's failure to properly re-engage the drive system after operating the unit manually or some other system failure.

Though the development of the MCI application was done many years ago, it is Ricon's understanding that an electro-mechanical stow locking device consistent with that used on other applications of the Mirage lift with other vehicle manufacturers was offered to MCI at the time. However, MCI refused this device based on the fact that the lift was to be installed behind a mechanically locked and electrically interlocked luggage bay door. Further, it was the position of the MCI engineers involved at the time that said door was adequate to hold back the wheelchair lift in the event of an inadvertent lift deployment.

Since MCI began using the Mirage lift, there have been two different types of luggage bay door configurations; the door-within-a-door type such as the one involved in the subject recall and another type where the luggage bay door is hinged along one edge and mechanically latched along the other. Other North American Coach Manufacturers have installed Mirage lifts wherein the luggage bay door configuration is similar to the latter MCI configuration.

The only known occurrences of inadvertent deployments have occurred with the MCI door-within-a-door type luggage bay door configuration. Accordingly, the only configuration involved in MCI's recall is the door-within-a-door configuration. Units installed behind the hinged luggage bay door apparently do not share the same weakness as the door-within-a-door type and are, therefore, not part of MCI's recall.



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Rest assured that we will continue to diligently monitor the situation and will take corrective action should the need arise.

Should you have any questions or wish to discuss the matter further, please contact me or my colleague, Oscar Pardinás.

Sincerely,

A handwritten signature in black ink, appearing to read "SDS", is positioned below the word "Sincerely,".

Stanton D. Saucier, PE  
Vice President – Marketing and  
Product Planning  
Ricon Corp.  
A Wabtec Company

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Good Evening Mr. Ansley:

Please find attached a response to your enquiry regarding MCI's 10V-087 recall.

Please let me know if you require anything further.

Kind Regards,

Stanton D. Saucier, PE  
VP – Marketing and Product Planning  
Ricon Corp.  
A Wabtec Company

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**From:**

Mr. Pardinas / Mr. Saucier,

Good afternoon,

Regarding MCI's 10V-087 recall (report attached), does Ricon intend to submit an equipment Defect Report for these wheelchair lifts that might experience a roll pin failure? We understand Ricon has supplied MCI a remedy for this issue, but we have not received notification of this safety defect from Ricon.

Did Ricon sell these same or similar wheelchair lifts to any other customers?

Please contact me with any questions.

Thank you,

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