

SURE-LOK
Safe and Secure

Sure-Lok, Inc.
151 Industrial Parkway
Branchburg, NJ 08876-3451
Tel 908 231-1804
Fax 908 231-6887
www.sure-lok.com

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August 16, 2004

VIA FAX 202-366-7882, 2 pages total
ATTENTION MR. CHARGE PERSON

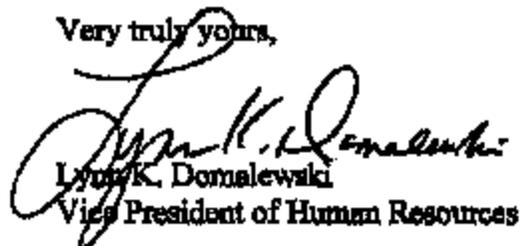
Subject: Recall No. 04E058
Notification Pursuant to 49 CFR Part 573 of Defective Retractors

Dear Sir/Madame:

As requested in your fax of August 13, we have corrected the Auto Safety Hotline number in the notice to customers. The final copy is attached.

If you have any questions, please contact me at 908-231-1800 X128. My direct fax number is 908-218-1143.

Very truly yours,


Lynn K. Domalewski
Vice President of Human Resources

Attachment: Notice to customers - final

August 16, 2004

Dear Valued Customer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Sure-Lok, Inc. has decided that a defect which relates to motor vehicle safety exists in its Wheelchair Securement Retractor Assemblies. While this defect only occurs in a small number of the retractor assemblies, it needs to be addressed.

The description of the defect is set forth in the attached Safety Bulletin. As long as this malfunction exists, the wheelchair may not be secured during a crash. Following the instructions set forth in the attached Safety Bulletin will ensure that the problem does not occur regarding your Sure-Lok wheelchair securement systems.

If the system is not checked as the Safety Bulletin instructs, then in a crash the wheelchair could possibly not be secured resulting in injury to the wheelchair passenger.

If you identify a defective retractor assembly, it should be returned to us as instructed. Sure-Lok, Inc. will replace the defective part at no cost. (In the event you have already paid for a replacement of the defective part, Sure-Lok will reimburse you.)

If the above-mentioned recall and remedy are not completed to your satisfaction, you may contact the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street SW, Washington, DC 20590 or call the toll free Auto Safety Hotline at 888-327-4236 and reference NHTSA Recall #04E058.

We appreciate your business and truly regret any inconvenience that this recall may cause you. Should you require more specific information, contact Sure-Lok Customer Service at 866-787-3565.

Sincerely,

Dana Yarnell, CQM, CQE, CQA
Quality Assurance Manager

Attachment: Safety Bulletin 08/04 (3 pages) re NHTSA Recall #04E058

SAFETY BULLETIN

Page 1 of 3

August 4, 2004

There is a possibility of a component related defect in Sure-Lok retractable wheelchair tie-down assemblies. It has been identified in only a few retractor assemblies; however, the potential for serious injury is sufficient to warrant this alert. This safety bulletin affects all retractable wheelchair tie-down assemblies shipped through July 2004.

The component defect places the sprocket teeth of the retractor assembly out of alignment, causing the load pawl to not fully seat in the sprocket teeth. **ALL retractable wheelchair tie-down assemblies must be inspected for this potential condition.** See instructions below. Any retractor, which meets the defined criteria, needs to be removed from service immediately and returned to Sure-Lok for replacement at no charge. Contact Customer Service at 866-787-3565 for further instructions.

Instructions for Inspecting Retractors

Retractor Operation:

Each retractor assembly has a load pawl that engages into two sprockets (one on each side). As the retractor strap is wound into the case, the load pawl ratchets or clicks into the teeth of the sprockets. On units that have the proper alignment (phasing) of the sprockets, the load pawl clicks into and seats in both sprockets simultaneously. On these units, there are 24 teeth encountered on one full rotation of the retractor knob.

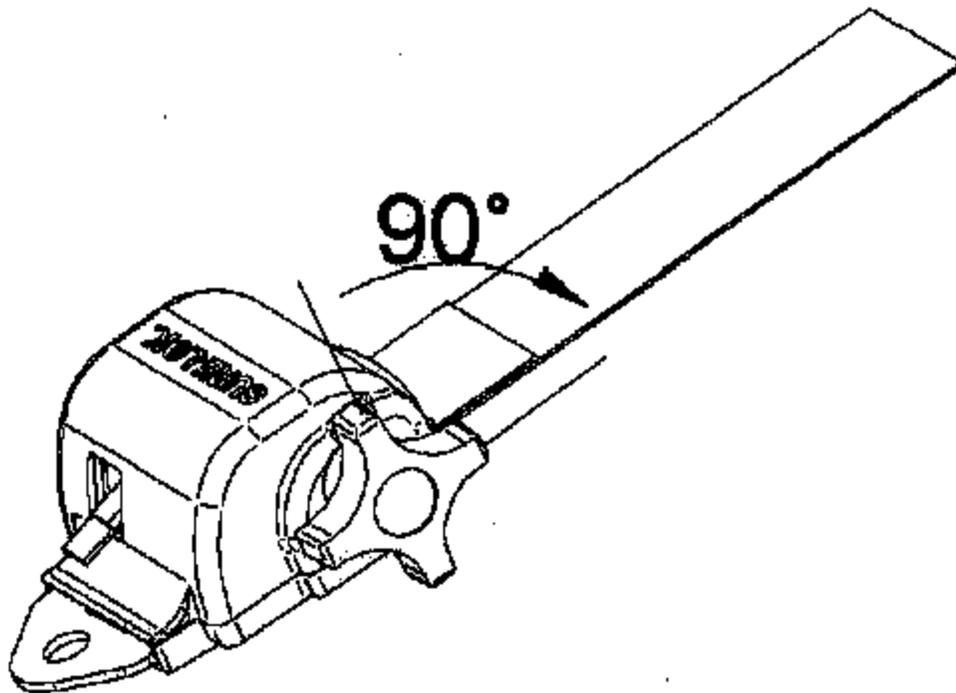
On units that exhibit the identified alignment or phase problem, the load pawl does not seat in both sprockets simultaneously, but encounters the sprocket teeth on one sprocket and then the other in succession. One full rotation of the retractor knob will click through 48 teeth (24 teeth for each sprocket) on these units.

SAFETY BULLETIN

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Inspecting Units That Have A Retractor Knob:

Release the retractor strap and pull approximately 1 foot of webbing from the retractor. Position the retractor knob so that one of the lugs on the knob is at the 12:00 o'clock position. Slowly rotate the retractor knob one-quarter rotation (90 degrees) and count the clicks as the load pawl encounters the sprocket teeth. Units that are out of phase and require replacement will have 12 clicks. Contact Sure-Lok customer service at 866-787-3565.



Rotate the knob $\frac{1}{4}$ turn as shown in the picture and count the clicks

6 clicks identifies a properly functioning retractor

12 clicks identifies a defective unit that requires replacement

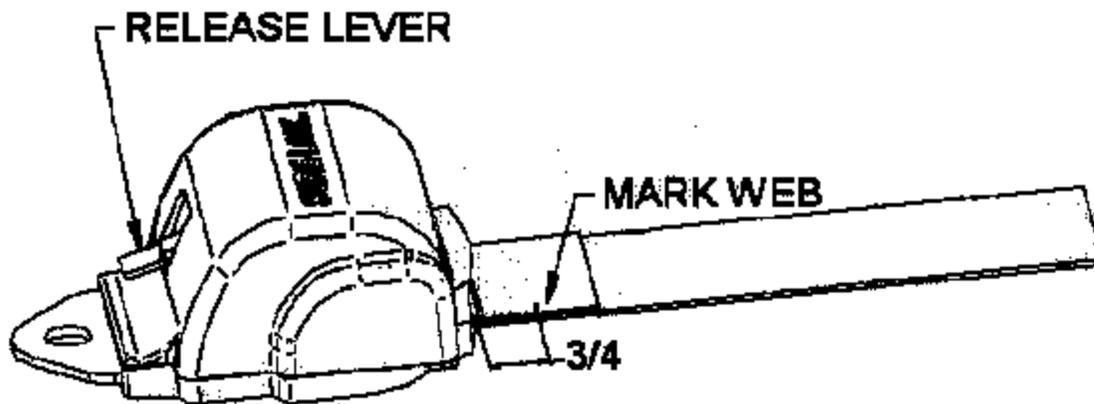
SAFETY BULLETIN

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Inspecting Units That Do Not Have A Retractor Knob:

Fully extend the webbing from the retractor, and measure $\frac{3}{4}$ inch from the entrance throat of the retractor. Draw a line on the webbing at this point $\frac{3}{4}$ inch from the entrance throat of the retractor. While holding the extended webbing taut, slowly depress the release lever to the point that it just releases the web.

Allow the webbing to be drawn into the retractor until the mark that you made is at the entrance of the retractor housing. Go slowly, one ratchet step at a time while counting the feel of ratchet clicks. It is necessary to let the release lever ride over the top of the sprocket teeth to feel the clicks. There should be the feel of six ratchet clicks encountered for a $\frac{3}{4}$ inch length of webbing. 12 clicks over the $\frac{3}{4}$ inch span of webbing indicates a defective retractor which needs to be removed from service immediately. Contact Sure-Lok customer service at 866-787-3565.



6 clicks to retract $\frac{3}{4}$ " of fully-extended web identifies a properly functioning retractor
12 clicks to retract $\frac{3}{4}$ " of fully-extended web identifies a defective unit that requires replacement

Sample envelope for notice to customers re retractor (notation is positioned in accordance with instructions from the US Postal Service):

Sure-Lok, Inc.
151 Industrial Parkway
Branchburg, NJ 08876-3451

RECALL SAFETY NOTICE

John Doe
Acme Co
123 Main Street
Anywhere NJ 99999