



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Daimler Buses North America, Inc.
6012 High Point Rd.
Greensboro, NC 27407

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Daimler Buses North America, Inc.:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **3** of these defective units to Daimler Buses North America, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was



installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

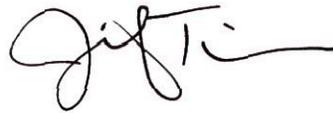
If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Matthew Sausaman
Turtle Top, Inc.
67819 State Road 15
New Paris, IN 46553

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Sausaman:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **178** of these defective units to Turtle Top, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was



installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Timian', with a long horizontal flourish extending to the right.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Andy Mulick
Transportation Collaborative, Inc.
7 Lake Station Rd.
Warwick, NY 10990

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Mulick:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **2** of these defective units to Transportation Collaborative, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle



manufacturer as to those vehicles it manufactured in which the defective equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Barry Hines
TMC Group, Inc.
2503 ADA Dr.
Elkhart, IN 46514

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Hines:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold 4 of these defective units to TMC Group, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was



installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J Timian", with a long horizontal line extending to the right.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Pat Moriarty
Oshkosh Speciality Vehicles
2150 Dolton Rd.
Calumet City, IL 60409

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Moriarty:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **1** of these defective units to Oshkosh Speciality Vehicles (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle



manufacturer as to those vehicles it manufactured in which the defective equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

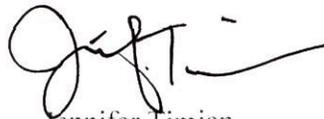
This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Al Groom
OBS, Inc.
1324 Tuscarawas St. West
Canton, OH 44702

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Groom:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **2** of these defective units to OBS, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was



installed. The content of that notification is specified in 49 U.S.C. 573.6. Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5. "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J Timian", with a long horizontal flourish extending to the right.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Denny Summers
Mobilityworks, Inc.
1020 Laskey Rd.
Toledo, OH 43612

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Summers:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **35** of these defective units to Mobilityworks, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was



installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J Timian". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke extending to the right.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Ms. Charlotte Powell
Mid Bus, Inc.
15 Compound Dr.
Hutchinson, KS 67502

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Ms. Powell:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold 17 of these defective units to Mid Bus, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was



installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5. "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Larry Hall
Forest River, Inc.
2367 Century Dr.
Goshen, IN 46528

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Hall:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **156** of these defective units to Forest River, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was



installed. The content of that notification is specified in 49 U.S.C. 573.6. Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J Timian", with a long horizontal flourish extending to the right.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Ken Farber
Farber Speciality Vehicles
7052 Americana Parkway
Columbus, OH 43068

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Farber:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold 2 of these defective units to Farber Speciality Vehicles (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle



manufacturer as to those vehicles it manufactured in which the defective equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Nathan Miles
Elkhart Coach Division
52807 County Rd. 7
Elkhart, IN 46514

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Miles:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **58** of these defective units to Elkhart Coach Division (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle



manufacturer as to those vehicles it manufactured in which the defective equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with the first name being more prominent.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Peter Dakin
Dodgen Industries, Inc.
Hwy. 169 North
Humbolt, IA 50548

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Dakin:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **1** of these defective units to Dodgen Industries, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle



manufacturer as to those vehicles it manufactured in which the defective equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J Timian", with a long horizontal flourish extending to the right.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Don Russel
DDT Mobility, LLC
2800 Bryant St.
Elkhart, IN 46516

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Russel:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold 1 of these defective units to DDT Mobility, LLC (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was



installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J Timian", with a long horizontal flourish extending to the right.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Barry Hines
Ameritrans Bus
26328 Parkview Ave.
Elkhart, IN 46514

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Hines:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **2** of these defective units to Ameritrans Bus (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was



installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

June 14, 2013

Mr. Denny Summers
Accubuilt, Inc.
1020 Laskey Rd.
Toledo, OH 43612

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Summers:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain S-Series and K-Series wheelchair lifts that the manufacturer has decided contain a safety related defect that could cause a short circuit resulting in a fire. This investigation has been assigned the identification EQ13-003.

The purpose of this letter is to make you aware of a potential safety problem in S-Series and K-Series Ricon Corporation (Ricon) wheelchair lifts, and to remind you of your responsibilities under Federal law. In a letter dated October 23, 2012, Ricon notified the NHTSA that it had decided a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006 and equipped with an optional armored pendant cable. The cable may have been installed such that it doesn't clear the wheelchair lift and without a protective cover or an improperly installed protective cover. The cable may contact the power lug at the base of the wheelchair lift causing a short circuit that could result in a fire. Ricon identified the number of units affected to be 3,780. This matter was assigned recall number 12E-038.

On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 had increased to 4,075. This matter was assigned recall number 13E-001. A copy of the notification is enclosed for your information. Recall 12E-038 has been superseded by recall 13E-001.

Ricon reported to NHTSA that it sold **3** of these defective units to Accubuilt, Inc. (your company) for possible installation into new motor vehicles, including trailer applications.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in one of their vehicles. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was

installed. The content of that notification is specified in 49 U.S.C. 573.6. Defect and Noncompliance Information Report. As of this date, we have not received the required report from your company.

In view of this safety risk and your company's obligations under Federal law should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5. "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;
- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and,
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these lifts are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5

U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure