

**RECEIVED**

By Recall Management Division at 8:43 am, Oct 18, 2013

13V-524  
(7 pages)

Safety Defect and Noncompliance Report Guide for Vehicles  
**PART 573 Defect and Noncompliance Responsibility and Reports**<sup>1</sup>

On October 1, 2013 Turtle Top [MFR] decided that (a defect which relates to motor vehicle safety)(~~a noncompliance with Federal Motor Vehicle Safety Standard No. \_\_\_\_\_~~) exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 **Defect and Noncompliance Responsibility and Reports**.

Date this report was prepared: October 1, 2013

Furnish the manufacturer's identification code for this recall (if applicable): Turtle Top: TBD and  
A&M Systems: 13E-045

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

Independent Protection Company, Inc., dba Turtle Top

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

Janet L. Kercher-Dudley, Standards Engineer

janetd@turtletop.com

Telephone Number: (574)831-4340 X146 Fax No.: (574)831-4349

Name and Title of Person who prepared this report.

Janet L. Kercher-Dudley

Standards Engineer

Signed:



<sup>1</sup> Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or by E-Mail to [RMD.ODI@dot.gov](mailto:RMD.ODI@dot.gov).

**I. Identify the Vehicle Models Involved in the Recall**

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

**Make(s):** Turtle Top **Model Years Involved:** 2009 **Model(s):** various

**Production Dates: Beginning:** 08-01-2009 **Ending:** 10-13-2009

**VIN Range: Beginning:** Various **Ending:** Various

**Vehicle Type:** Bus **Bodystyle:** Transit Bus

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

Buses included in the recall population have A & M Systems Incorporated passenger entrance / exit doors which have a model number 3230 printed circuit board (PCB), a component of the door assembly mechanism.

**Make(s):** \_\_\_\_\_ **Model Years Involved:** \_\_\_\_\_ **Model(s):** \_\_\_\_\_

**Production Dates: Beginning:** \_\_\_\_\_ **Ending:** \_\_\_\_\_

**VIN Range: Beginning:** \_\_\_\_\_ **Ending:** \_\_\_\_\_

**Vehicle Type:** \_\_\_\_\_ **Bodystyle:** \_\_\_\_\_

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

\_\_\_\_\_  
\_\_\_\_\_

**Make(s):** \_\_\_\_\_ **Model Years Involved:** \_\_\_\_\_ **Model(s):** \_\_\_\_\_

**Production Dates: Beginning:** \_\_\_\_\_ **Ending:** \_\_\_\_\_

**VIN Range: Beginning:** \_\_\_\_\_ **Ending:** \_\_\_\_\_

**Vehicle Type:** \_\_\_\_\_ **Bodystyle:** \_\_\_\_\_

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

\_\_\_\_\_  
\_\_\_\_\_

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

**II. Identify the Recall Population**

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

<b>Model</b>	<b>Year</b>	<b>Number of Vehicles Potentially Involved</b>
Ford Odyssey LT	2009	2

**Total Number Potentially Affected by the Recall:** 2

**4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:** 100%

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

Turtle Top learned of the recall through a notification from A & M Systems, Inc. in a letter and bulletin (DOC00039) concerning a problem with one model printed circuit board. A & M identified that the recall circuit boards were supplied and installed on A & M Systems door headers for the electrically operated passenger entrance / exit door. Based on purchasing records and a sales order query for buses built with optional electrical door assemblies, along with manufacture dates, and dates affected recalled equipment was ordered and installed, Turtle Top was able to determine the potential vehicles affected under this recall by model names and model years.

**III. Describe the Defect or Noncompliance**

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

*From A & M Systems, Inc. 573 report to the NHTSA dated August 15, 2013, note the following: The PC Board develops a high resistance and overheats and could eventually burn if the condition is left long enough.*

---

---

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

*From A & M Systems, Inc. 573 report: Anomalies such as voltage spikes damages electrical components and electrical circuit and cause failures. Poorly soldered connections could also have an effect on the integrity of the system.*

---

---

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

*From A & M Systems, Inc. 573 report: The condition causes a high resistance and the unit becomes hot; although not enough current flow to blow the fuse.*

---

---

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

*From A & M Systems, Inc. 573 report: Possible intermittent failure followed by normal operation.*

---

---

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

A & M Systems, Inc.

---

4121 Eastland Drive

---

Elkhart, IN 46516

---

www.anmsystems.com

---

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

James C. Miller, jimm@anmsystems.com 574-522-5000, ext. 12

---

**IV. Provide the Chronology in Determining the Defect/Noncompliance**

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

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

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

Turtle Top received a letter and technical bulletin from A & M Systems, Inc. on Sept. 16, 2013. Turtle Top began the record search for whether any buses could be affected by the recall. On Oct. 1, Turtle Top determined the recall population of buses.

---

---

---

**V. Identify the Remedy**

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

*From A & M Systems, Inc. 573 report: Any model 3230 PC Board sold as Original Equipment or Service Part sold will be replaced free of charge plus one (1) hour of labor.*

---

The A & M Systems, Inc. technical bulletin (DOC00039) details how to identify the 3230 PCB and how to obtain a replacement PCB through A & M Systems' warranty program and how to install the replacement board.

---

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

A & M Systems will be offering a free replacement PCB to replace any model 3230 board.

*From A & M Systems, Inc. 573 report:* The style of electrical components soldered into the assembly; surface mounted vs. thru-wire soldered. Additionally, the board layout is significantly different.

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

*From A & M Systems, Inc. Part 573 Report:* The style of electrical components soldered into the assembly; surface mounted vs. thru-wire soldered. Additionally, the board layout is significantly different.

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

According to A & M Systems, the problem had been corrected in production.

**VI. Identify the Recall Schedule**

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

October 2, 2013: 573 Defect Report and Draft Notification Letter sent to the NHTSA.

Once the NHTSA assigns a recall number to Turtle Top, sends an acknowledgement letter upon acceptance of this 573 defect report, and approves the draft notification letter to bus owners, then Turtle Top is ready to send out notification letters to owners on record. Based on whether the NHTSA Office of Defect Investigations is open or closed during the federal government shutdown and how soon Turtle Top receives feedback from the NHTSA will determine the estimated date notification letters can be mailed.

## VII. Furnish Recall Communications

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

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.