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By Recall Management Division at 7:11 am, Aug 05, 2014

Daimler Trucks North America  
Nasser Zamani  
Senior Manager  
Compliance and Regulatory Affairs

August 4, 2014

Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attention: Recall Management Division (NVS-215)  
1200 New Jersey Avenue S.E.  
Washington D.C. 20590

## Re: Defect Information Report FL-663, Ricon Chair Lift Platform

Ms. Lewis,

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Daimler Trucks North America LLC herewith reports a safety campaign to recall approximately 4,386 Thomas Built Buses, FS-65, Saf-T-Liner C2, Saf-T-Liner HDX, Saf-T-Liner EF, Saf-T-Liner EFX, Minotour DRW manufactured January 3, 2006 through August 1, 2014, and equipped with Ricon wheelchair lifts with a defect in the platform side plate material. The breakdowns of school buses to non-school buses are as follows:

Vehicle	School Bus	Non-School bus
FS-65	116	0
Saf-T-Liner C2	2,459	0
Saf-T-Liner HDX	267	26
Saf-T-Liner EF	180	11
Saf-T-Liner EFX	39	3
Minotour DRW	1,273	12

Please note that this information is related to 14E-041 produced by the Ricon Corporation.

Attached is Daimler Trucks North America's Defect Information Report.

A Daimler Company

Daimler Trucks North America LLC  
4747 N. Channel Avenue  
Portland OR 97217-7699  
503-745-6910 Phone  
503-745-5544 Fax  
Nasser.Zamani@Daimler.com

Please contact me if you have any questions.

Sincerely yours,

A handwritten signature in black ink that reads "Nasser Zamani". The signature is written in a cursive style with a large, stylized initial 'N'.

Nasser Zamani

Cc: Amy Martin, Chief Counsel, CAL-OSHA  
Enclosure  
Certified Mail#

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## Defect Information Report

(Section 573.6)

August 4, 2014

**(c)(1) Manufacturer:** Daimler Trucks North America LLC  
P.O. BOX 3849  
Portland, Oregon 97208  
(503) 745-5219

**Brands:** Thomas Built Buses

**(c)(2) Vehicles identification:**

**Model(s) affected:** Saf-T-Liner HDX Non-School Bus, Saf-T-Liner EF Non-School Bus, Saf-T-Liner EFX Non-School Bus, Minotour DRW Non-School Bus

**Model Years affected:** 2006 - 2015

**Manufacture Dates:** 1/3/2006 – 8/1/2014

**Basis for determining population:** All of the affected models of Thomas Built Buses equipped with Ricon S Series lifts.

**Component manufacturer if other than the vehicle manufacturer:**

Ricon Corporation, A Wabtec Subsidiary  
1135 Aviation Place  
San Fernando, CA 91340

**(c)(3) Total number of vehicles potentially affected:** Approximately 52 Vehicles

26 – Saf-T-Liner HDX

11 – Saf-T-Liner EF

3 – Saf-T-Liner EFX

12 – Minotour DRW

**(c)(4) Percentage of vehicles estimated to contain the defect:** Unknown

**(c)(5) Description of the defect:** The platforms included on the subject S-Series model wheelchair lifts can exhibit cracking of the platform side plate while in the stowed position which, if left unchecked, can propagate to the point where separation of the rear portion of the side plate occurs rendering the lift potentially inoperable and possibly unsafe for the operator.

**49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety:** In the event the aforementioned crack occurs on both sides of the platform and is allowed to propagate to the point of material separation on both sides, it is possible for the lift platform to lean against the vehicle lift doors and fall out of the vehicle when the doors are opened putting the lift operator at risk.

**(c)(6) Chronology of principal events:**

3/24/14 First Student in Baltimore, MD Notified TBB of issuing a technical service report indicating that a Ricon wheelchair lift arm broke off causing the lift platform to drop against the door and fall to the ground if the door was opened.

3/25/14 TBB sent a Supplier Corrective Action Request (SCAR) to the supplier, Ricon, requesting information including root causes and failure modes analysis for platform cracks.

4/3/14 to 5/29 Investigation and communications with the supplier continued. Weekly conference calls established to obtain requested information as it became available.

6/26/14 Supplier provided TBB with a copy of a failure platform analysis and a service bulletin informing TBB that it had not been able to duplicate the failure and the issue did not present a hazard to vehicle safety.

6/26/14 DTNA discussed the issue internally and determined more information was necessary to make a decision. Communications with supplier continued.

7/23/14 Ricon provided a copy of its 573 document to TBB.

7/29/14 DTNA decided to issue a 573 to NHTSA.

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**(c)(7) Noncompliance-test or other data:** Not Applicable

**(c)(8) (i) Remedial program:** Lifts in the population will be inspected for platforms with cracks. Platforms without cracks will have a supplemental platform support bumper kit installed with no charge to the customer. Any platforms with a crack will be replaced with no charge to the customer. Repairs will be performed by Ricon authorized service facilities.

**Reimbursement Plan:** Copies will be submitted as a supplemental report when available.

**(ii) Estimated Owner and Dealer Notification Date:** Customer notification will be by first class mail using Daimler Trucks North America records to determine the customers affected. This will be completed no later than October 2, 2014.

Dealer and distributor notification will be completed no later than October 2, 2014.

**(c)(9) Information for tire recalls:** Not Applicable

**(c)(10) Communications sent to manufacturers, dealers and owners:** Copies will be submitted as a supplemental report when available.

**(c)(11) Manufacturer's campaign number:** FL-663