



Division of Independent Protection Co., Inc.  
67819 State Road 15 New Paris, Indiana 46553

Mr. Richard Boyd  
Chief  
Medium & Heavy Duty Vehicle Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, DC 20590  
April 21, 2004

RE: NHTSA File PE04-008

Response to requested peer information from Turtle Top regarding engine compartment fires in Turtle Top buses.

Dear Mr. Boyd,

Answers to questions in letter to Turtle Top regarding alleged defect in 2000-2002 buses built on General Motors and Ford cutaway chassis manufactured by Turtle Top. Alleged defect is:

- fire or evidence of fire of engine components, electrical components or any associated components in the engine compartment
- melting or evidence of melting of engine components, electrical components or any other material in the engine compartment
- smoke damage or evidence of smoke damage of any components in the engine department

Questions from NHTSA ODI (in italics):

1. *Furnish the total number of Turtle Top buses built on General Motors and Ford cutaway chassis manufactured for sale or lease in the United States.*

answer: 2,008 total units. (1,699 = Ford; 309 = General Motors). Source of information: Turtle Top History for TREAD Act. Date information gathered: 12-05-2003. Last date information gathered: 04-21-2004.

2. *Furnish the number of/and copies of all owner complaints and field reports, studies, surveys, or investigations from all sources which have been received or authorized by Turtle Top, or of which Turtle Top is aware, pertaining to the alleged defect in the subject vehicles. This should include information pertaining to the report included with this letter. Separate the number and copies of owner complaints from other sources. Also, if Turtle Top has issued any service or technical bulletins, advisories, or other communications to dealers pertaining to the alleged defect in the subject vehicles, provide a copy of each document. If no such documents have been issued, so state.*

answer: 1. Source of information: Turtle Top corporate records maintained at Independent Protection Company, Goshen Indiana. (Independent Protection Company is the parent company of

Phone 574 831-4340 • Fax 574-831-4340  
www.turtletop.com

Turtle Top and Terra Transit). Date information gathered: 01-02-2002. Copy of last notification on file included with this letter (copy of letter from [REDACTED]). Last date information gathered: 04-21-2004. Note: no Turtle Top bulletins, advisories or communication documents pertaining to the alleged defect were issued to dealers.

3. *Identify and describe all accidents, subrogation claims, or lawsuits known to Turtle Top pertaining to the alleged defect (where Turtle Top is or was a defendant or codefendant). Provide Turtle Top analysis of each item, clearly identifying the vehicle (model year and VIN), the vehicle owner, and any injuries or property damage which may have occurred.*

answer: 0. Source of information: Turtle Top corporate records maintained at Independent Protection Company, Goshen Indiana. (Independent Protection Company is the parent company of Turtle Top and Terra Transit). Last date information gathered: 04-21-2004.

4. *Identify and describe all significant modifications or changes that could relate to the alleged defect in the manufacture of the subject vehicles. The following information must be included for each modification or change:*

- a. *the reason for the modification or change;*
- b. *a description of the modification or change;*
- c. *the approximate calendar date on which the modification or change was incorporated into production; and*
- d. *state whether the modified or changed components could be interchanged with earlier production components.*

answer: (sources of information: Turtle Top engineering change request database, date information gathered: 04-21-2004).

1. Moving battery to slide-out tray:

- a. *reason:* per customer request or design specifications.
- b. *description:* one battery installed under hood may be moved to slide-out battery with other battery so that batteries are in one place allowing access to both batteries. If moved, junction block installed in place where battery was installed.
- c. *date:* on-going from approx. 1993 to YTD.
- d. *interchangeability:* yes, in most cases.

2. Installing additional battery cables and/or circuit protective devices:

- a. *reason:* per customer request or design specifications.
- b. *description:* additional battery cables or circuit protective devices for powering secondary body electrical requirements (i.e. wheelchair lift systems).
- c. *date:* on-going from approx. 1968 to YTD.
- d. *interchangeability:* yes, in most cases.

3. Alternator changes:

- a. *reason:* per customer request or design specifications for supplying sufficient power requirements.
- b. *description:* additional and/or removal and replacement of OEM installed alternator with higher performance alternator.
- c. *date:* on-going from approx. 1993 to YTD. Specifically Engineering Change Notice 20005-0030 dated 5-11-2000 for Ford gasoline engines in 2001 models with air conditioning upgrade. Also, ECN 20005-0223 dated 12-12-2001 for Chevrolet chassis in 2002 MY as required for higher output and ECN 2002-0228

dated 9-3-2002 for all fuel models of limo coaches for battery isolators, cables and alternator upgrades for supplying sufficient power.

d. *interchangeability*: yes, in most cases.

5. *Furnish the number of warranty claims related to the alleged defect on the subject vehicles by model series code, calendar month, and problem code. Each problem claims code must be identified.*

answer: 0. Source of information: Turtle Top Historical Report for Warranty Claims and Field Reports for TREAD ACT and also historical records of Turtle Top Warranty Repair Claims. Date information gathered: 01-23-2004. Last date information gathered: 04-21-2004.

Regards,



Janet L. Kercher-Dudley  
Standards Engineer

Enclosure

January 2, 2002

John Shin  
Silverman, Colura & Chernis, P.C.  
381 Park Ave South, Suite 1601  
New York, New York 10016

TT Body #

98930

Prod. DATE

1-17-2000

Re: [REDACTED]  
Overview of information included:

### Vehicle Information

- Owner [REDACTED]
  - Ford Chassis Manufacturer
  - Terra Transit Body Manufacturer
  - Vin # 1FDXE45F1 [REDACTED]
  - Terra Transit # TT-30539
  - Our cost \$54,500.00
  - Sale Price
  - Delivered March 13, 2000
  - Fire December 27, 2000
- Approx. 7,500 Miles

### Players

- [REDACTED]
- [REDACTED]
- [REDACTED]

- **Ford Motor Company**
  - Andrew Chabot            Claims Analyst
  - Thayne N. Hansen       Modified Vehicle Specialist
  - Steven Dains            Ford Rep
- **Slope Auto Sound & Security**
  - Installers of TV/VCR

1. Overview
2. ■■■ shop work performed (no electrical and very minimal other work performed)    Delivery slip    Glass receipt    Shop write up
3. ■■■ invoice from Central New York Coach            Sale invoice to Harlem Hospital            Air Conditioning warranty work invoiced to Terra Transit
4. Letter from Arnold Pack to Tom Dressel, 12/29/2000
  - From Arnold Pack to Ford, 1/2/2001
  - From Pack to Tom Dressel 2/15/2001
  - From Pack to Tom Dressel 3/6/2001
  - Certificate of Title
  - Pack to Kleinman 4/9/2001
  - 2 receipts for 2 ford buses for smoke coming from the steering wheel. It was determined it was the air bags.
  - Purchase Order from Harlem Hospital to JBS for bus
  - Receipt from Slope Auto Sound & Security billed to Metropolitan Hospital for TV's, VCR's and Antenna's installed in three buses. JBS did not have anything to do with this aftermarket installation. (All Electrical)
5. Letter to ■■■ from our Insurance carrier saying they could not cover us because I didn't report the loss as soon as it happened. This whole thing has been strange because NY is self- insured.
6. Letter 8/24/2001 from Kleinman to Tom Dressel saying Ford has been in communication with us and we have been unwilling to or unable to resolve the matter. I strongly disagreed in my letter back to Kleinman saying no one from Ford had tried to communicate with us. I think anyone can see that any time Kleinman contacted our office they were answered.
7. Faxed letters from ■■■ on 8/9/01 to Silverman, Cullinan and Nat notifying you all of possible lawsuits.
8. E-mails to Steve Dains (Ford) and replies.

9. 1 of 7 is pictures of burned Hospital Bus

10. 1 of 4 is pictures of a bus owned by [REDACTED] that I ran across the same day I looked at Hospital bus. (The day after the fire)

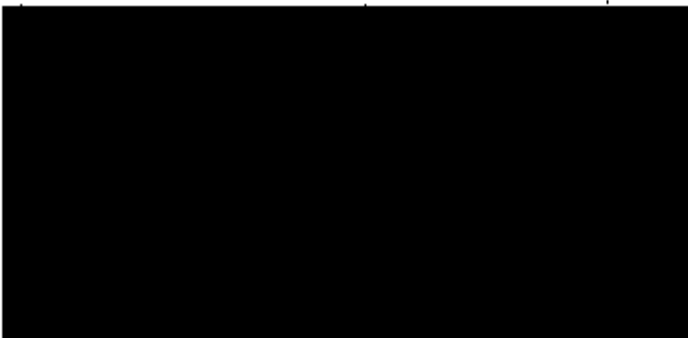
11. [REDACTED] bus that burned the day before [REDACTED] burned.

12. All three of these buses are built on Ford Chassis's. All three have diesel engines. [REDACTED] bus was being driven when it burned. [REDACTED] bus was parked in there parking lot at 8 o'clock at nite.

13. The next picture is an '85 Ford diesel that burned at nite, while parked and not running.

14. The next 41 pages are all the e-mails from Kleinman, Thayne Hansen, Phil Tom and myself.

Thanks,



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