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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 2 6 2010

Siebert Mobility
P.O. Box 2347
Benton, AR 72018

NVS-215aa
EQ10-001
08E-046

Attn: President/Chief Counsel

Dear Sir or Madam,

On April 20, 2010, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving 6-way power seat bases that were manufactured by Ricon Corporation and sold to your company to be installed in new or used motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter. We have also attached a copy of the certified mail receipt signed by a representative of your company on April 23, 2010.

This letter is being sent to you to remind you that you must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Should you need an electronic copy of our earlier letter, please e-mail Alex Ansley at alexander.ansley@dot.gov and a copy can be e-mailed to you. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov. If you are unable to reply by that time, you may request an extension by calling me at (202) 366-5210.

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

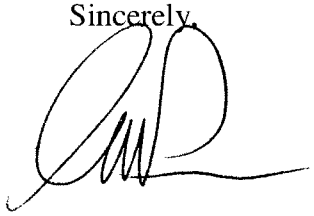
word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

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. It constitutes a new request for information. 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. A person that violates 49 U.S.C. § 30166 could be liable to the United States Government for a maximum penalty of $6,000 per violation per day. The maximum penalty for a related series of daily violations is $16,375,000.

I urge you to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,



George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

ENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Siebert Mobility
P.O. Box 2347
Benton, AR 72018
Attn: Warranty/Compliance Dept.

COMPLETE THIS SECTION ON DELIVERY

A Signature

☐ Agent
☐ Addressee

B. Received by (Printed Name) Carlton Finney

C. Date of Delivery

☐ Yes
☐ No

☐ Express Mail
☐ Return Receipt for Merchandise
☐ C.O.D.

Delivery? *(Extra Fee)* ☐ Yes

Article Number
(Transfer from service label)

Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 2 0 2010

Siebert Mobility
P.O. Box 2347
Benton, AR 72018

NVS-215aa
EQ10-001
08E-046

Attn: Compliance Dept. / Warranty Dept.

Sear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured and to remind you of your responsibilities under Federal law. We also request a written response from your company upon processing the required information outlined below.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 08E-046. In a letter dated July 30, 2008 Ricon Corporation (Ricon) reported that certain 6-way power seat bases, produced between January 1, 2006 and May 14, 2007, contain a weld on the pivot shaft that may fail due to poor (cold) welding. A failed pivot shaft weld can cause the driver's seat to become detached from the seat base, possibly causing injury to the driver and increasing the risk of a crash. NHTSA assigned recall number 08E-046 to this matter.

In Ricon's Defect Information Report, Siebert Mobility (your company) was identified as a purchaser of 2 of these defective power seat bases. A copy of Ricon's Defect Information Report is enclosed for your information.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA whenever a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard is identified 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.

This letter serves to remind you of your company's responsibilities, and to request that you supply a report if required. Guidance is provided in the following paragraphs to assist you in determining whether or not you are required to file a report. If you are required to file a report, please provide the information required by 49 CFR 573.6. Detailed information about that report follows. Additionally, please include the date on which you received notification of this matter from Ricon.

If you primarily sell new vehicles or equipment for purposes other then resale, please identify yourself as a dealer. If you primarily sell new vehicles or equipment for resale, please identify yourself as a distributor. If you manufacture new motor vehicles, please identify yourself as a vehicle manufacturer. Please keep in mind trailers are defined by the U.S. Safety Act as motor vehicles. If you manufacture original equipment for new motor vehicles, please identify yourself as an original equipment manufacturer. If you manufacture motor vehicle equipment for resale, please identify yourself as a replacement equipment manufacturer. (For more detailed definitions please see 49 U.S.C. § 30102). Only vehicle and equipment manufacturers are required to file 573 Defect and Noncompliance Reports with NHTSA.

Please Note: A person/company that *alters* new vehicles with the installation of these power seat bases may also be required to file a Defect Information Report with NHTSA. Should this equipment be installed on a vehicle that is then sold to the first retail purchaser, a Defect Information Report will be required. Should you have any questions regarding your company's obligations in this matter, please contact Alex Ansley of NHTSA RMD at (202) 493-0481 or alexander.ansley@dot.gov.

In view of this safety risk, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective power seat bases. 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 manufacture motor vehicles and has not resold this equipment, but this equipment is in your possession, NHTSA recommends contacting Ricon for the appropriate action.

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.

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To summarize, RMD asks that you respond to this letter identifying the following:

1. Your company's role in the distribution of this equipment (i.e. dealer, distributor, vehicle manufacturer, etc.).

2. If you have not incorporated this equipment into new motor vehicles you manufacture, please so state. Please also contact Ricon at 1-818-267-3000 referring to recall 08E-046 to assist Ricon with contacting your retail customers.

3. If you have incorporated this equipment into new motor vehicles you manufacture, please reply with the aforementioned Defect Information Report and review your obligations to provide 6 quarterly reports.

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 EQ10-001.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

08E-046
(4 pages)

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

July 30, 2008

Mr. Daniel Smith
Associate Administrator for Enforcement
NHTSA - 215
1200 New Jersey Ave., SE
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report
Reference: Ricon 6-Way Power Transfer Seat Base

Dear Sir:

On July 30, 2008, Ricon Corporation identified that a potential defect may exist in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 – Defect and Noncompliance Reports.

This report was prepared on July 30, 2008

1. The full corporate name of the fabricating manufacturer is:

   Ricon Corporation
   A Wabtec Company
   7900 Nelson Road
   Panorama City, CA 91402

   The corporate officials that the agency should contact with respect to this recall are:

   Stanton Saucier
   General Manager
   ssaucier@wabtec.com
   Phone 818 267-3016
   Fax 818 267-3187

   Oscar Pardinas
   Vice President of Sales and Marketing
   opardinas@wabtec.com
   Phone 818 267-3085
   Fax 818 267-3155

Sincerely,

Oscar Pardinas
Vice President of Sales and Marketing

RECEIVED
2008 AUGUST 7
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report

I. Identify the Recalled Items of Equipment

2. **Identify the Items of Equipment Involved in this Recall:**

   a. This recall applies to pivoting plate used on Ricon's 6-way power transfer seat base.

   b. There are three Model names for these 6-way power transfer seat bases:

      (1) Standard 6-way Power Seat Base (Right turn)
      (2) R1209-L 6-way Power Seat Base (Left turn)
      (3) R1209-E 6-way Power Seat Base (Extended travel)

   c. The model numbers for the seat bases are:

      (1) R1209
      (2) R1209-L
      (3) R1209-E

II. Identify the Recall Population

3. **Identify the Recall Population:** 6-way Power Seat Bases manufactured between January 1, 2006, and May 14, 2007 inclusive.

4. **Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 50%

III. Describe the Defect or Noncompliance

5. **Describe the defect or noncompliance:** The weld on the pivot pin, which is welded to the swivel plate may fail

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Describe the cause(s) of the defect or noncompliance: A poor (cold) weld

Describe the consequence(s) of the defect or noncompliance: The occupant, seated in a seat attached to the pivoting plate, may fall of the seat.

Identify any warning which can (a) precede or (b) occur: The seat may appear crooked or out of vertical alignment

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

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

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.**

- March 2006 - Received notification from European staff of a failure - no injury
- April 2006 - Received notification of a domestic failure from Lift Aids of Fortworth TX, - no injury

- Between May 2006 and October 2006, Ricon recalled 126, 6-way Power Seat Bases in various inventories
- Between May 2006 and October 2006 Ricon:
  - Inspected and found no problems in 35, 6-way Power Seat Bases
  - Repaired 78 questionable 6-way Power Seat Bases
  - Scrapped 13, 6-way Power Seat Base which we were not able to ascertain condition

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.** N/A

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

V. Identify the Remedy

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

Inspect the swivel plate weldment per Ricon Service Bulletin RSB105.A. Replace swivel plate as necessary.

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

The Replacement parts can be distinguished from the recall components by the reduced number of components. The recalled weldment consists of a pin a bushing and a swivel pate. The new components consist of a pin and a swivel plate only.

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.

The recall condition was corrected in production on all lifts manufactured after May 14, 2007.

VI. Identify the Recall Schedule

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

Ricon Corporation anticipates the recall campaign will begin in September 1, 2008. At that time, manufacturers, distributors and dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population.

VII. Furnish Recall Communications

9. **Furnish Recall Communications:** Attached for NHTSA review and approval.

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 2 6 2010

Hoglund Bus Co., Inc.
1701 East Anson
Marshalltown, IA 50158

NVS-215aa
EQ10-001
08E-046

Attn: President/Chief Counsel

Dear Sir or Madam,

On April 20, 2010, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving 6-way power seat bases that were manufactured by Ricon Corporation and sold to your company to be installed in new or used motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

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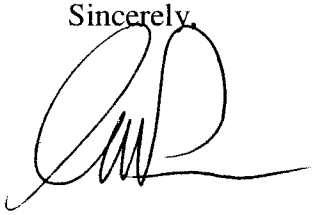
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I urge you to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,



George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

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Print your name and address on the reverse so that we can return the card to you.
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Article Addressed to:

Hoglund Bus Co., Inc.
1701 East Anson
Marshalltown, IA 50158
Attn: Warranty/Compliance Dept.

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☒ Agent ☐ Addressee

B. Received by (Printed Name) [illegible] C. Date of Delivery 8/4/10

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Mail ☐ Express Mail
d ☐ Return Receipt for Merchandise
lail ☐ C.O.D.

elivery? *(Extra Fee)* ☐ Yes

Article Number
(Transfer from service label) 7008 1830 0001 4173 2939

S Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

U.S. Department
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**National Highway
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1200 New Jersey Avenue SE
Washington, DC 20590

APR 2 0 2010

Hoglund Bus Co., Inc.
1701 East Anson
Marshalltown, IA 50158

NVS-215aa
EQ10-001
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Attn: Compliance Dept. / Warranty Dept.

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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 manufacture motor vehicles and has not resold this equipment, but this equipment is in your possession, NHTSA recommends contacting Ricon for the appropriate action.

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3. If you have incorporated this equipment into new motor vehicles you manufacture, please reply with the aforementioned Defect Information Report and review your obligations to provide 6 quarterly reports.

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 EQ10-001.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

08E-046
(4 pages)

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

July 30, 2008

Mr. Daniel Smith
Associate Administrator for Enforcement
NHTSA - 215
1200 New Jersey Ave., SE
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report
Reference: Ricon 6-Way Power Transfer Seat Base

Dear Sir:

On July 30, 2008, Ricon Corporation identified that a potential defect may exist in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 – Defect and Noncompliance Reports.

This report was prepared on July 30, 2008

1. The full corporate name of the fabricating manufacturer is:

   Ricon Corporation
   A Wabtec Company
   7900 Nelson Road
   Panorama City, CA 91402

   The corporate officials that the agency should contact with respect to this recall are:

   Stanton Saucier
   General Manager
   ssaucier@wabtec.com
   Phone 818 267-3016
   Fax 818 267-3187

   Oscar Pardinas
   Vice President of Sales and Marketing
   opardinas@wabtec.com
   Phone 818 267-3085
   Fax 818 267-3155

Sincerely,

Oscar Pardinas
Vice President of Sales and Marketing

RECEIVED
2008 AUGUST 7
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report

I. Identify the Recalled Items of Equipment

2. **Identify the Items of Equipment Involved in this Recall:**

   a. This recall applies to pivoting plate used on Ricon's 6-way power transfer seat base.

   b. There are three Model names for these 6-way power transfer seat bases:

      (1) Standard 6-way Power Seat Base (Right turn)
      (2) R1209-L 6-way Power Seat Base (Left turn)
      (3) R1209-E 6-way Power Seat Base (Extended travel)

   c. The model numbers for the seat bases are:

      (1) R1209
      (2) R1209-L
      (3) R1209-E

II. Identify the Recall Population

3. **Identify the Recall Population:** 6-way Power Seat Bases manufactured between January 1, 2006, and May 14, 2007 inclusive.

4. **Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 50%

III. Describe the Defect or Noncompliance

5. **Describe the defect or noncompliance:** The weld on the pivot pin, which is welded to the swivel plate may fail

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Describe the cause(s) of the defect or noncompliance: A poor (cold) weld

Describe the consequence(s) of the defect or noncompliance: The occupant, seated in a seat attached to the pivoting plate, may fall of the seat.

Identify any warning which can (a) precede or (b) occur: The seat may appear crooked or out of vertical alignment

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

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

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.**

- March 2006 - Received notification from European staff of a failure - no injury
- April 2006 - Received notification of a domestic failure from Lift Aids of Fortworth TX, - no injury

- Between May 2006 and October 2006, Ricon recalled 126, 6-way Power Seat Bases in various inventories
- Between May 2006 and October 2006 Ricon:
    - Inspected and found no problems in 35, 6-way Power Seat Bases
    - Repaired 78 questionable 6-way Power Seat Bases
    - Scrapped 13, 6-way Power Seat Base which we were not able to ascertain condition

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.** N/A

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

V. Identify the Remedy

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

Inspect the swivel plate weldment per Ricon Service Bulletin RSB105.A. Replace swivel plate as necessary.

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

The Replacement parts can be distinguished from the recall components by the reduced number of components. The recalled weldment consists of a pin a bushing and a swivel pate. The new components consist of a pin and a swivel plate only.

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.

The recall condition was corrected in production on all lifts manufactured after May 14, 2007.

VI. Identify the Recall Schedule

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

Ricon Corporation anticipates the recall campaign will begin in September 1, 2008. At that time, manufacturers, distributors and dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population.

VII. Furnish Recall Communications

9. **Furnish Recall Communications:** Attached for NHTSA review and approval.

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 2 6 2010

Ilderton Conversion Co
701 South Main Street
High Point, NC 27261-0350

NVS-215aa
EQ10-001
08E-046

Attn: President/Chief Counsel

Dear Sir or Madam,

On April 20, 2010, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving 6-way power seat bases that were manufactured by Ricon Corporation and sold to your company to be installed in new or used motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter. We have also attached a copy of the certified mail receipt signed by a representative of your company on April 22, 2010.

This letter is being sent to you to remind you that you must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Should you need an electronic copy of our earlier letter, please e-mail Alex Ansley at alexander.ansley@dot.gov and a copy can be e-mailed to you. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov. If you are unable to reply by that time, you may request an extension by calling me at (202) 366-5210.

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.

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. It constitutes a new request for information. 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. A person that violates 49 U.S.C. § 30166 could be liable to the United States Government for a maximum penalty of $6,000 per violation per day. The maximum penalty for a related series of daily violations is $16,375,000.

I urge you to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

ENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Gina Stone ☐ Agent ☐ Addressee

B. Received by (Printed Name) Gina Stone | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Ilderton Conversion Co
701 South Main Street
High Point, NC 27261-0350
Attn: Warranty/Compliance Dept.

Mail ☐ Express Mail
d ☐ Return Receipt for Merchandise
Mail ☐ C.O.D.

elivery? *(Extra Fee)* ☐ Yes

Article Number
(Transfer from service label) 7008 1830 0001 4173 2946

S Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 2 0 2010

Ilderton Conversion Co
701 South Main Street
High Point, NC 27261-0350

NVS-215aa
EQ10-001
08E-046

Attn: Compliance Dept. / Warranty Dept.

Sear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured and to remind you of your responsibilities under Federal law. We also request a written response from your company upon processing the required information outlined below.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 08E-046. In a letter dated July 30, 2008 Ricon Corporation (Ricon) reported that certain 6-way power seat bases, produced between January 1, 2006 and May 14, 2007, contain a weld on the pivot shaft that may fail due to poor (cold) welding. A failed pivot shaft weld can cause the driver's seat to become detached from the seat base, possibly causing injury to the driver and increasing the risk of a crash. NHTSA assigned recall number 08E-046 to this matter.

In Ricon's Defect Information Report, Ilderton Conversion Co (your company) was identified as a purchaser of 1 of these defective power seat bases. A copy of Ricon's Defect Information Report is enclosed for your information.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA whenever a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard is identified 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.

This letter serves to remind you of your company's responsibilities, and to request that you supply a report if required. Guidance is provided in the following paragraphs to assist you in determining whether or not you are required to file a report. If you are required to file a report, please provide the information required by 49 CFR 573.6. Detailed information about that report follows. Additionally, please include the date on which you received notification of this matter from Ricon.

If you primarily sell new vehicles or equipment for purposes other then resale, please identify yourself as a dealer. If you primarily sell new vehicles or equipment for resale, please identify yourself as a distributor. If you manufacture new motor vehicles, please identify yourself as a vehicle manufacturer. Please keep in mind trailers are defined by the U.S. Safety Act as motor vehicles. If you manufacture original equipment for new motor vehicles, please identify yourself as an original equipment manufacturer. If you manufacture motor vehicle equipment for resale, please identify yourself as a replacement equipment manufacturer. (For more detailed definitions please see 49 U.S.C. § 30102). Only vehicle and equipment manufacturers are required to file 573 Defect and Noncompliance Reports with NHTSA.

Please Note: A person/company that *alters* new vehicles with the installation of these power seat bases may also be required to file a Defect Information Report with NHTSA. Should this equipment be installed on a vehicle that is then sold to the first retail purchaser, a Defect Information Report will be required. Should you have any questions regarding your company's obligations in this matter, please contact Alex Ansley of NHTSA RMD at (202) 493-0481 or alexander.ansley@dot.gov.

In view of this safety risk, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective power seat bases. 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 manufacture motor vehicles and has not resold this equipment, but this equipment is in your possession, NHTSA recommends contacting Ricon for the appropriate action.

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.

To summarize, RMD asks that you respond to this letter identifying the following:

1. Your company's role in the distribution of this equipment (i.e. dealer, distributor, vehicle manufacturer, etc.).

2. If you have not incorporated this equipment into new motor vehicles you manufacture, please so state. Please also contact Ricon at 1-818-267-3000 referring to recall 08E-046 to assist Ricon with contacting your retail customers.

3. If you have incorporated this equipment into new motor vehicles you manufacture, please reply with the aforementioned Defect Information Report and review your obligations to provide 6 quarterly reports.

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 EQ10-001.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

08E-046
(4 pages)

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

July 30, 2008

Mr. Daniel Smith
Associate Administrator for Enforcement
NHTSA - 215
1200 New Jersey Ave., SE
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report
Reference: Ricon 6-Way Power Transfer Seat Base

Dear Sir:

On July 30, 2008, Ricon Corporation identified that a potential defect may exist in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 – Defect and Noncompliance Reports.

This report was prepared on July 30, 2008

1. The full corporate name of the fabricating manufacturer is:

   Ricon Corporation
   A Wabtec Company
   7900 Nelson Road
   Panorama City, CA 91402

   The corporate officials that the agency should contact with respect to this recall are:

   Stanton Saucier
   General Manager
   ssaucier@wabtec.com
   Phone 818 267-3016
   Fax 818 267-3187

   Oscar Pardinas
   Vice President of Sales and Marketing
   opardinas@wabtec.com
   Phone 818 267-3085
   Fax 818 267-3155

Sincerely,

Oscar Pardinas
Vice President of Sales and Marketing

RECEIVED
2008 AUGUST 7
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report

I. Identify the Recalled Items of Equipment

2. **Identify the Items of Equipment Involved in this Recall:**

   a. This recall applies to pivoting plate used on Ricon's 6-way power transfer seat base.

   b. There are three Model names for these 6-way power transfer seat bases:

      (1) Standard 6-way Power Seat Base (Right turn)
      (2) R1209-L 6-way Power Seat Base (Left turn)
      (3) R1209-E 6-way Power Seat Base (Extended travel)

   c. The model numbers for the seat bases are:

      (1) R1209
      (2) R1209-L
      (3) R1209-E

II. Identify the Recall Population

3. **Identify the Recall Population:** 6-way Power Seat Bases manufactured between January 1, 2006, and May 14, 2007 inclusive.

4. **Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 50%

III. Describe the Defect or Noncompliance

5. **Describe the defect or noncompliance:** The weld on the pivot pin, which is welded to the swivel plate may fail

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Describe the cause(s) of the defect or noncompliance: A poor (cold) weld

Describe the consequence(s) of the defect or noncompliance: The occupant, seated in a seat attached to the pivoting plate, may fall of the seat.

Identify any warning which can (a) precede or (b) occur: The seat may appear crooked or out of vertical alignment

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

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

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.**

- March 2006 - Received notification from European staff of a failure - no injury
- April 2006 - Received notification of a domestic failure from Lift Aids of Fortworth TX, - no injury

- Between May 2006 and October 2006, Ricon recalled 126, 6-way Power Seat Bases in various inventories
- Between May 2006 and October 2006 Ricon:
    - Inspected and found no problems in 35, 6-way Power Seat Bases
    - Repaired 78 questionable 6-way Power Seat Bases
    - Scrapped 13, 6-way Power Seat Base which we were not able to ascertain condition

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.** N/A

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

V. Identify the Remedy

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

Inspect the swivel plate weldment per Ricon Service Bulletin RSB105.A. Replace swivel plate as necessary.

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

The Replacement parts can be distinguished from the recall components by the reduced number of components. The recalled weldment consists of a pin a bushing and a swivel pate. The new components consist of a pin and a swivel plate only.

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.

The recall condition was corrected in production on all lifts manufactured after May 14, 2007.

VI. Identify the Recall Schedule

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

Ricon Corporation anticipates the recall campaign will begin in September 1, 2008. At that time, manufacturers, distributors and dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population.

VII. Furnish Recall Communications

9. **Furnish Recall Communications:** Attached for NHTSA review and approval.

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 2 6 2010

New England Wheels Inc
33 Manning Rd
Billerica, MA 01821-5728

NVS-215aa
EQ10-001
08E-046

Attn: President/Chief Counsel

Dear Sir or Madam,

On April 20, 2010, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving 6-way power seat bases that were manufactured by Ricon Corporation and sold to your company to be installed in new or used motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter. We have also attached a copy of the certified mail receipt signed by a representative of your company on April 22, 2010.

This letter is being sent to you to remind you that you must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Should you need an electronic copy of our earlier letter, please e-mail Alex Ansley at alexander.ansley@dot.gov and a copy can be e-mailed to you. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov. If you are unable to reply by that time, you may request an extension by calling me at (202) 366-5210.

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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.

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. It constitutes a new request for information. 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. A person that violates 49 U.S.C. § 30166 could be liable to the United States Government for a maximum penalty of $6,000 per violation per day. The maximum penalty for a related series of daily violations is $16,375,000.

I urge you to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

ENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

New England Wheels Inc
33 Manning Rd
Billerica, MA 01821-5728
Attn: Warranty/Compliance Dept.

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) Barry LeBlanc
C. Date of Delivery 4/22/10

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

[illegible] ☐ Express Mail
☐ Return Receipt for Merchandise
☐ C.O.D.

[illegible]livery? (Extra Fee) ☐ Yes

Article Number
(Transfer from service label) 7008 1830 0001 4173 2953

Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 2 0 2010

New England Wheels Inc
33 Manning Rd
Billerica, MA 01821-5728

NVS-215aa
EQ10-001
08E-046

Attn: Compliance Dept. / Warranty Dept.

Sear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured and to remind you of your responsibilities under Federal law. We also request a written response from your company upon processing the required information outlined below.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 08E-046. In a letter dated July 30, 2008 Ricon Corporation (Ricon) reported that certain 6-way power seat bases, produced between January 1, 2006 and May 14, 2007, contain a weld on the pivot shaft that may fail due to poor (cold) welding. A failed pivot shaft weld can cause the driver's seat to become detached from the seat base, possibly causing injury to the driver and increasing the risk of a crash. NHTSA assigned recall number 08E-046 to this matter.

In Ricon's Defect Information Report, New England Wheels Inc (your company) was identified as a purchaser of 3 of these defective power seat bases. A copy of Ricon's Defect Information Report is enclosed for your information.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA whenever a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard is identified 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.

This letter serves to remind you of your company's responsibilities, and to request that you supply a report if required. Guidance is provided in the following paragraphs to assist you in determining whether or not you are required to file a report. If you are required to file a report, please provide the information required by 49 CFR 573.6. Detailed information about that report follows. Additionally, please include the date on which you received notification of this matter from Ricon.

If you primarily sell new vehicles or equipment for purposes other then resale, please identify yourself as a dealer. If you primarily sell new vehicles or equipment for resale, please identify yourself as a distributor. If you manufacture new motor vehicles, please identify yourself as a vehicle manufacturer. Please keep in mind trailers are defined by the U.S. Safety Act as motor vehicles. If you manufacture original equipment for new motor vehicles, please identify yourself as an original equipment manufacturer. If you manufacture motor vehicle equipment for resale, please identify yourself as a replacement equipment manufacturer. (For more detailed definitions please see 49 U.S.C. § 30102). Only vehicle and equipment manufacturers are required to file 573 Defect and Noncompliance Reports with NHTSA.

Please Note: A person/company that *alters* new vehicles with the installation of these power seat bases may also be required to file a Defect Information Report with NHTSA. Should this equipment be installed on a vehicle that is then sold to the first retail purchaser, a Defect Information Report will be required. Should you have any questions regarding your company's obligations in this matter, please contact Alex Ansley of NHTSA RMD at (202) 493-0481 or alexander.ansley@dot.gov.

In view of this safety risk, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective power seat bases. 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 manufacture motor vehicles and has not resold this equipment, but this equipment is in your possession, NHTSA recommends contacting Ricon for the appropriate action.

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.

To summarize, RMD asks that you respond to this letter identifying the following:

1. Your company's role in the distribution of this equipment (i.e. dealer, distributor, vehicle manufacturer, etc.).

2. If you have not incorporated this equipment into new motor vehicles you manufacture, please so state. Please also contact Ricon at 1-818-267-3000 referring to recall 08E-046 to assist Ricon with contacting your retail customers.

3. If you have incorporated this equipment into new motor vehicles you manufacture, please reply with the aforementioned Defect Information Report and review your obligations to provide 6 quarterly reports.

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 EQ10-001.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

08E-046
(4 pages)

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

July 30, 2008

Mr. Daniel Smith
Associate Administrator for Enforcement
NHTSA - 215
1200 New Jersey Ave., SE
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report
Reference: Ricon 6-Way Power Transfer Seat Base

Dear Sir:

On July 30, 2008, Ricon Corporation identified that a potential defect may exist in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 – Defect and Noncompliance Reports.

This report was prepared on July 30, 2008

1. The full corporate name of the fabricating manufacturer is:

   Ricon Corporation
   A Wabtec Company
   7900 Nelson Road
   Panorama City, CA 91402

   The corporate officials that the agency should contact with respect to this recall are:

   Stanton Saucier
   General Manager
   ssaucier@wabtec.com
   Phone 818 267-3016
   Fax 818 267-3187

   Oscar Pardinas
   Vice President of Sales and Marketing
   opardinas@wabtec.com
   Phone 818 267-3085
   Fax 818 267-3155

Sincerely,

Oscar Pardinas
Vice President of Sales and Marketing

RECEIVED
2008 AUGUST 7
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report

I. Identify the Recalled Items of Equipment

2. **Identify the Items of Equipment Involved in this Recall:**

   a. This recall applies to pivoting plate used on Ricon's 6-way power transfer seat base.

   b. There are three Model names for these 6-way power transfer seat bases:

      (1) Standard 6-way Power Seat Base (Right turn)
      (2) R1209-L 6-way Power Seat Base (Left turn)
      (3) R1209-E 6-way Power Seat Base (Extended travel)

   c. The model numbers for the seat bases are:

      (1) R1209
      (2) R1209-L
      (3) R1209-E

II. Identify the Recall Population

3. **Identify the Recall Population:** 6-way Power Seat Bases manufactured between January 1, 2006, and May 14, 2007 inclusive.

4. **Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 50%

III. Describe the Defect or Noncompliance

5. **Describe the defect or noncompliance:** The weld on the pivot pin, which is welded to the swivel plate may fail

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Describe the cause(s) of the defect or noncompliance: A poor (cold) weld

Describe the consequence(s) of the defect or noncompliance: The occupant, seated in a seat attached to the pivoting plate, may fall of the seat.

Identify any warning which can (a) precede or (b) occur: The seat may appear crooked or out of vertical alignment

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

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

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.**

- March 2006 - Received notification from European staff of a failure - no injury
- April 2006 - Received notification of a domestic failure from Lift Aids of Fortworth TX, - no injury

- Between May 2006 and October 2006, Ricon recalled 126, 6-way Power Seat Bases in various inventories
- Between May 2006 and October 2006 Ricon:
    - Inspected and found no problems in 35, 6-way Power Seat Bases
    - Repaired 78 questionable 6-way Power Seat Bases
    - Scrapped 13, 6-way Power Seat Base which we were not able to ascertain condition

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.** N/A

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

V. Identify the Remedy

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

Inspect the swivel plate weldment per Ricon Service Bulletin RSB105.A. Replace swivel plate as necessary.

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

The Replacement parts can be distinguished from the recall components by the reduced number of components. The recalled weldment consists of a pin a bushing and a swivel pate. The new components consist of a pin and a swivel plate only.

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.

The recall condition was corrected in production on all lifts manufactured after May 14, 2007.

VI. Identify the Recall Schedule

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

Ricon Corporation anticipates the recall campaign will begin in September 1, 2008. At that time, manufacturers, distributors and dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population.

VII. Furnish Recall Communications

9. **Furnish Recall Communications:** Attached for NHTSA review and approval.

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 2 6 2010

Northern Bus Sales, Inc.
13 Rebel Rd
Hudson, NH 03051

NVS-215aa
EQ10-001
08E-046

Attn: President/Chief Counsel

Dear Sir or Madam,

On April 20, 2010, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving 6-way power seat bases that were manufactured by Ricon Corporation and sold to your company to be installed in new or used motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter. We have also attached a copy of the certified mail receipt signed by a representative of your company on April 22, 2010.

This letter is being sent to you to remind you that you must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Should you need an electronic copy of our earlier letter, please e-mail Alex Ansley at alexander.ansley@dot.gov and a copy can be e-mailed to you. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov. If you are unable to reply by that time, you may request an extension by calling me at (202) 366-5210.

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

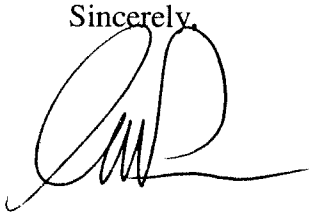
word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

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. It constitutes a new request for information. 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. A person that violates 49 U.S.C. § 30166 could be liable to the United States Government for a maximum penalty of $6,000 per violation per day. The maximum penalty for a related series of daily violations is $16,375,000.

I urge you to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,



George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

ENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Northern Bus Sales, Inc.
13 Rebel Rd
Hudson, NH 03051
Attn: Warranty/Compliance Dept.

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X

☐ Agent
☐ Addressee

B. Received by *(Printed Name)*

C. Date of Delivery
4/22/10

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

...Mail ☐ Express Mail
...d ☐ Return Receipt for Merchandise
...ail ☐ C.O.D.

...elivery? *(Extra Fee)* ☐ Yes

Article Number
(Transfer from service label) 7008 1830 0001 4173 2960

3 Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 2 0 2010

Northern Bus Sales, Inc.
13 Rebel Rd
Hudson, NH 03051

NVS-215aa
EQ10-001
08E-046

Attn: Compliance Dept. / Warranty Dept.

Sear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured and to remind you of your responsibilities under Federal law. We also request a written response from your company upon processing the required information outlined below.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 08E-046. In a letter dated July 30, 2008 Ricon Corporation (Ricon) reported that certain 6-way power seat bases, produced between January 1, 2006 and May 14, 2007, contain a weld on the pivot shaft that may fail due to poor (cold) welding. A failed pivot shaft weld can cause the driver's seat to become detached from the seat base, possibly causing injury to the driver and increasing the risk of a crash. NHTSA assigned recall number 08E-046 to this matter.

In Ricon's Defect Information Report, Northern Bus Sales, Inc. (your company) was identified as a purchaser of 1 of these defective power seat bases. A copy of Ricon's Defect Information Report is enclosed for your information.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA whenever a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard is identified 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.

This letter serves to remind you of your company's responsibilities, and to request that you supply a report if required. Guidance is provided in the following paragraphs to assist you in determining whether or not you are required to file a report. If you are required to file a report, please provide the information required by 49 CFR 573.6. Detailed information about that report follows. Additionally, please include the date on which you received notification of this matter from Ricon.

If you primarily sell new vehicles or equipment for purposes other then resale, please identify yourself as a dealer. If you primarily sell new vehicles or equipment for resale, please identify yourself as a distributor. If you manufacture new motor vehicles, please identify yourself as a vehicle manufacturer. Please keep in mind trailers are defined by the U.S. Safety Act as motor vehicles. If you manufacture original equipment for new motor vehicles, please identify yourself as an original equipment manufacturer. If you manufacture motor vehicle equipment for resale, please identify yourself as a replacement equipment manufacturer. (For more detailed definitions please see 49 U.S.C. § 30102). Only vehicle and equipment manufacturers are required to file 573 Defect and Noncompliance Reports with NHTSA.

Please Note: A person/company that *alters* new vehicles with the installation of these power seat bases may also be required to file a Defect Information Report with NHTSA. Should this equipment be installed on a vehicle that is then sold to the first retail purchaser, a Defect Information Report will be required. Should you have any questions regarding your company's obligations in this matter, please contact Alex Ansley of NHTSA RMD at (202) 493-0481 or alexander.ansley@dot.gov.

In view of this safety risk, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective power seat bases. 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 manufacture motor vehicles and has not resold this equipment, but this equipment is in your possession, NHTSA recommends contacting Ricon for the appropriate action.

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.

To summarize, RMD asks that you respond to this letter identifying the following:

1. Your company's role in the distribution of this equipment (i.e. dealer, distributor, vehicle manufacturer, etc.).

2. If you have not incorporated this equipment into new motor vehicles you manufacture, please so state. Please also contact Ricon at 1-818-267-3000 referring to recall 08E-046 to assist Ricon with contacting your retail customers.

3. If you have incorporated this equipment into new motor vehicles you manufacture, please reply with the aforementioned Defect Information Report and review your obligations to provide 6 quarterly reports.

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 EQ10-001.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

08E-046
(4 pages)

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

July 30, 2008

Mr. Daniel Smith
Associate Administrator for Enforcement
NHTSA - 215
1200 New Jersey Ave., SE
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report
Reference: Ricon 6-Way Power Transfer Seat Base

Dear Sir:

On July 30, 2008, Ricon Corporation identified that a potential defect may exist in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 – Defect and Noncompliance Reports.

This report was prepared on July 30, 2008

1. The full corporate name of the fabricating manufacturer is:

   Ricon Corporation
   A Wabtec Company
   7900 Nelson Road
   Panorama City, CA 91402

   The corporate officials that the agency should contact with respect to this recall are:

   Stanton Saucier
   General Manager
   ssaucier@wabtec.com
   Phone 818 267-3016
   Fax 818 267-3187

   Oscar Pardinas
   Vice President of Sales and Marketing
   opardinas@wabtec.com
   Phone 818 267-3085
   Fax 818 267-3155

Sincerely,

Oscar Pardinas
Vice President of Sales and Marketing

RECEIVED
2008 AUGUST 7
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report

I. Identify the Recalled Items of Equipment

2. **Identify the Items of Equipment Involved in this Recall:**

   a. This recall applies to pivoting plate used on Ricon's 6-way power transfer seat base.

   b. There are three Model names for these 6-way power transfer seat bases:

      (1) Standard 6-way Power Seat Base (Right turn)
      (2) R1209-L 6-way Power Seat Base (Left turn)
      (3) R1209-E 6-way Power Seat Base (Extended travel)

   c. The model numbers for the seat bases are:

      (1) R1209
      (2) R1209-L
      (3) R1209-E

II. Identify the Recall Population

3. **Identify the Recall Population:** 6-way Power Seat Bases manufactured between January 1, 2006, and May 14, 2007 inclusive.

4. **Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 50%

III. Describe the Defect or Noncompliance

5. **Describe the defect or noncompliance:** The weld on the pivot pin, which is welded to the swivel plate may fail

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Describe the cause(s) of the defect or noncompliance: A poor (cold) weld

Describe the consequence(s) of the defect or noncompliance: The occupant, seated in a seat attached to the pivoting plate, may fall of the seat.

Identify any warning which can (a) precede or (b) occur: The seat may appear crooked or out of vertical alignment

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

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

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.**

- March 2006 - Received notification from European staff of a failure - no injury
- April 2006 - Received notification of a domestic failure from Lift Aids of Fortworth TX, - no injury

- Between May 2006 and October 2006, Ricon recalled 126, 6-way Power Seat Bases in various inventories
- Between May 2006 and October 2006 Ricon:
    - Inspected and found no problems in 35, 6-way Power Seat Bases
    - Repaired 78 questionable 6-way Power Seat Bases
    - Scrapped 13, 6-way Power Seat Base which we were not able to ascertain condition

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.** N/A

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

V. Identify the Remedy

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

Inspect the swivel plate weldment per Ricon Service Bulletin RSB105.A. Replace swivel plate as necessary.

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

The Replacement parts can be distinguished from the recall components by the reduced number of components. The recalled weldment consists of a pin a bushing and a swivel pate. The new components consist of a pin and a swivel plate only.

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.

The recall condition was corrected in production on all lifts manufactured after May 14, 2007.

VI. Identify the Recall Schedule

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

Ricon Corporation anticipates the recall campaign will begin in September 1, 2008. At that time, manufacturers, distributors and dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population.

VII. Furnish Recall Communications

9. **Furnish Recall Communications:** Attached for NHTSA review and approval.

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 2 6 2010

Sunset Vans, Inc.
8851 Lakewood Boulevard
Downey, CA 90240-2301

NVS-215aa
EQ10-001
08E-046

Attn: President/Chief Counsel

Dear Sir or Madam,

On April 20, 2010, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving 6-way power seat bases that were manufactured by Ricon Corporation and sold to your company to be installed in new or used motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter. We have also attached a copy of the certified mail receipt signed by a representative of your company on April 23, 2010.

This letter is being sent to you to remind you that you must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Should you need an electronic copy of our earlier letter, please e-mail Alex Ansley at alexander.ansley@dot.gov and a copy can be e-mailed to you. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov. If you are unable to reply by that time, you may request an extension by calling me at (202) 366-5210.

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.

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. It constitutes a new request for information. 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. A person that violates 49 U.S.C. § 30166 could be liable to the United States Government for a maximum penalty of $6,000 per violation per day. The maximum penalty for a related series of daily violations is $16,375,000.

I urge you to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

ENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Sunset Vans, Inc.
3851 Lakewood Boulevard
Downey, CA 90240-2301
Attn: Warranty Compliance Dept.

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

☐ Express Mail
☐ Return Receipt for Merchandise
☐ C.O.D.

☐ Yes

Article Number
(Transfer from service label) 7008 1830 0001 4173 2977

Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 2 0 2010

Sunset Vans, Inc.
8851 Lakewood Boulevard
Downey, CA 90240-2301

NVS-215aa
EQ10-001
08E-046

Attn: Compliance Dept. / Warranty Dept.

Sear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured and to remind you of your responsibilities under Federal law. We also request a written response from your company upon processing the required information outlined below.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 08E-046. In a letter dated July 30, 2008 Ricon Corporation (Ricon) reported that certain 6-way power seat bases, produced between January 1, 2006 and May 14, 2007, contain a weld on the pivot shaft that may fail due to poor (cold) welding. A failed pivot shaft weld can cause the driver's seat to become detached from the seat base, possibly causing injury to the driver and increasing the risk of a crash. NHTSA assigned recall number 08E-046 to this matter.

In Ricon's Defect Information Report, Sunset Vans, Inc. (your company) was identified as a purchaser of 4 of these defective power seat bases. A copy of Ricon's Defect Information Report is enclosed for your information.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA whenever a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard is identified 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.

This letter serves to remind you of your company's responsibilities, and to request that you supply a report if required. Guidance is provided in the following paragraphs to assist you in determining whether or not you are required to file a report. If you are required to file a report, please provide the information required by 49 CFR 573.6. Detailed information about that report follows. Additionally, please include the date on which you received notification of this matter from Ricon.

If you primarily sell new vehicles or equipment for purposes other then resale, please identify yourself as a dealer. If you primarily sell new vehicles or equipment for resale, please identify yourself as a distributor. If you manufacture new motor vehicles, please identify yourself as a vehicle manufacturer. Please keep in mind trailers are defined by the U.S. Safety Act as motor vehicles. If you manufacture original equipment for new motor vehicles, please identify yourself as an original equipment manufacturer. If you manufacture motor vehicle equipment for resale, please identify yourself as a replacement equipment manufacturer. (For more detailed definitions please see 49 U.S.C. § 30102). Only vehicle and equipment manufacturers are required to file 573 Defect and Noncompliance Reports with NHTSA.

Please Note: A person/company that *alters* new vehicles with the installation of these power seat bases may also be required to file a Defect Information Report with NHTSA. Should this equipment be installed on a vehicle that is then sold to the first retail purchaser, a Defect Information Report will be required. Should you have any questions regarding your company's obligations in this matter, please contact Alex Ansley of NHTSA RMD at (202) 493-0481 or alexander.ansley@dot.gov.

In view of this safety risk, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective power seat bases. 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 manufacture motor vehicles and has not resold this equipment, but this equipment is in your possession, NHTSA recommends contacting Ricon for the appropriate action.

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.

To summarize, RMD asks that you respond to this letter identifying the following:

1. Your company's role in the distribution of this equipment (i.e. dealer, distributor, vehicle manufacturer, etc.).

2. If you have not incorporated this equipment into new motor vehicles you manufacture, please so state. Please also contact Ricon at 1-818-267-3000 referring to recall 08E-046 to assist Ricon with contacting your retail customers.

3. If you have incorporated this equipment into new motor vehicles you manufacture, please reply with the aforementioned Defect Information Report and review your obligations to provide 6 quarterly reports.

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 EQ10-001.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

08E-046
(4 pages)

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

July 30, 2008

Mr. Daniel Smith
Associate Administrator for Enforcement
NHTSA - 215
1200 New Jersey Ave., SE
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report
Reference: Ricon 6-Way Power Transfer Seat Base

Dear Sir:

On July 30, 2008, Ricon Corporation identified that a potential defect may exist in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 – Defect and Noncompliance Reports.

This report was prepared on July 30, 2008

1. The full corporate name of the fabricating manufacturer is:

   Ricon Corporation
   A Wabtec Company
   7900 Nelson Road
   Panorama City, CA 91402

   The corporate officials that the agency should contact with respect to this recall are:

   Stanton Saucier
   General Manager
   ssaucier@wabtec.com
   Phone 818 267-3016
   Fax 818 267-3187

   Oscar Pardinas
   Vice President of Sales and Marketing
   opardinas@wabtec.com
   Phone 818 267-3085
   Fax 818 267-3155

Sincerely,

Oscar Pardinas
Vice President of Sales and Marketing

RECEIVED
2008 AUGUST 7
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report

I. Identify the Recalled Items of Equipment

2. **Identify the Items of Equipment Involved in this Recall:**

   a. This recall applies to pivoting plate used on Ricon's 6-way power transfer seat base.

   b. There are three Model names for these 6-way power transfer seat bases:

      (1) Standard 6-way Power Seat Base (Right turn)
      (2) R1209-L 6-way Power Seat Base (Left turn)
      (3) R1209-E 6-way Power Seat Base (Extended travel)

   c. The model numbers for the seat bases are:

      (1) R1209
      (2) R1209-L
      (3) R1209-E

II. Identify the Recall Population

3. **Identify the Recall Population:** 6-way Power Seat Bases manufactured between January 1, 2006, and May 14, 2007 inclusive.

4. **Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 50%

III. Describe the Defect or Noncompliance

5. **Describe the defect or noncompliance:** The weld on the pivot pin, which is welded to the swivel plate may fail

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Describe the cause(s) of the defect or noncompliance: A poor (cold) weld

Describe the consequence(s) of the defect or noncompliance: The occupant, seated in a seat attached to the pivoting plate, may fall of the seat.

Identify any warning which can (a) precede or (b) occur: The seat may appear crooked or out of vertical alignment

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

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

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.**

- March 2006 - Received notification from European staff of a failure - no injury
- April 2006 - Received notification of a domestic failure from Lift Aids of Fortworth TX, - no injury

- Between May 2006 and October 2006, Ricon recalled 126, 6-way Power Seat Bases in various inventories
- Between May 2006 and October 2006 Ricon:
    - Inspected and found no problems in 35, 6-way Power Seat Bases
    - Repaired 78 questionable 6-way Power Seat Bases
    - Scrapped 13, 6-way Power Seat Base which we were not able to ascertain condition

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.** N/A

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

V. Identify the Remedy

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

Inspect the swivel plate weldment per Ricon Service Bulletin RSB105.A. Replace swivel plate as necessary.

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

The Replacement parts can be distinguished from the recall components by the reduced number of components. The recalled weldment consists of a pin a bushing and a swivel pate. The new components consist of a pin and a swivel plate only.

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.

The recall condition was corrected in production on all lifts manufactured after May 14, 2007.

VI. Identify the Recall Schedule

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

Ricon Corporation anticipates the recall campaign will begin in September 1, 2008. At that time, manufacturers, distributors and dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population.

VII. Furnish Recall Communications

9. **Furnish Recall Communications:** Attached for NHTSA review and approval.

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

1200 New Jersey Avenue SE
Washington, DC 20590

MAY 2 6 2010

The Mobility Specialist
490 Capricorn Street
Brea, CA 92821

NVS-215aa
EQ10-001
08E-046

Attn: President/Chief Counsel

Dear Sir or Madam,

On April 20, 2010, we wrote to your company as part of an ongoing investigation being conducted by the National Highway Traffic Safety Administration (NHTSA) about a safety issue involving 6-way power seat bases that were manufactured by Ricon Corporation and sold to your company to be installed in new or used motor vehicles. Your company's response to that letter was due to NHTSA within 10 days of receipt. At this time, we have not received your response.

A copy of our original letter is enclosed with this letter. We have also attached a copy of the certified mail receipt signed by a representative of your company on April 23, 2010.

This letter is being sent to you to remind you that you must respond to the earlier letter and that your company may have additional obligations under Federal law as we explained in the earlier letter.

A written response to our earlier letter must be submitted to this office within 7 days of your receipt of this letter. Should you need an electronic copy of our earlier letter, please e-mail Alex Ansley at alexander.ansley@dot.gov and a copy can be e-mailed to you. Response submission may be made by US Mail to the address listed therein, fax to (202) 366-7882, or e-mail rmd.odi@dot.gov. If you are unable to reply by that time, you may request an extension by calling me at (202) 366-5210.

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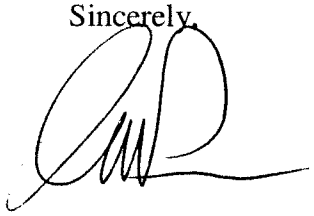
word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

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. It constitutes a new request for information. 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. A person that violates 49 U.S.C. § 30166 could be liable to the United States Government for a maximum penalty of $6,000 per violation per day. The maximum penalty for a related series of daily violations is $16,375,000.

I urge you to comply with this information request in order to ensure that these important issues relating to motor vehicle safety are promptly addressed.

Should you have any questions regarding this inquiry, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,



George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

ENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

The Mobility Specialist
490 Capricorn Street
Brea, CA 92821
Attn: Warranty/Compliance Dept.

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Nancy Orozco ☐ Agent ☐ Addressee

B. Received by (Printed Name) Nancy Orozco | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No



Mail ☐ Express Mail
d ☐ Return Receipt for Merchandise
ail ☐ C.O.D.

elivery? (Extra Fee) ☐ Yes

Article Number (Transfer from service label) 7008 1830 0001 4173 2984

3 Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 2 0 2010

The Mobility Specialist
490 Capricorn Street
Brea, CA 92821

NVS-215aa
EQ10-001
08E-046

Attn: Compliance Dept. / Warranty Dept.

Sear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured and to remind you of your responsibilities under Federal law. We also request a written response from your company upon processing the required information outlined below.

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 08E-046. In a letter dated July 30, 2008 Ricon Corporation (Ricon) reported that certain 6-way power seat bases, produced between January 1, 2006 and May 14, 2007, contain a weld on the pivot shaft that may fail due to poor (cold) welding. A failed pivot shaft weld can cause the driver's seat to become detached from the seat base, possibly causing injury to the driver and increasing the risk of a crash. NHTSA assigned recall number 08E-046 to this matter.

In Ricon's Defect Information Report, The Mobility Specialist (your company) was identified as a purchaser of 8 of these defective power seat bases. A copy of Ricon's Defect Information Report is enclosed for your information.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA whenever a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard is identified 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.

This letter serves to remind you of your company's responsibilities, and to request that you supply a report if required. Guidance is provided in the following paragraphs to assist you in determining whether or not you are required to file a report. If you are required to file a report, please provide the information required by 49 CFR 573.6. Detailed information about that report follows. Additionally, please include the date on which you received notification of this matter from Ricon.

If you primarily sell new vehicles or equipment for purposes other then resale, please identify yourself as a dealer. If you primarily sell new vehicles or equipment for resale, please identify yourself as a distributor. If you manufacture new motor vehicles, please identify yourself as a vehicle manufacturer. Please keep in mind trailers are defined by the U.S. Safety Act as motor vehicles. If you manufacture original equipment for new motor vehicles, please identify yourself as an original equipment manufacturer. If you manufacture motor vehicle equipment for resale, please identify yourself as a replacement equipment manufacturer. (For more detailed definitions please see 49 U.S.C. § 30102). Only vehicle and equipment manufacturers are required to file 573 Defect and Noncompliance Reports with NHTSA.

Please Note: A person/company that *alters* new vehicles with the installation of these power seat bases may also be required to file a Defect Information Report with NHTSA. Should this equipment be installed on a vehicle that is then sold to the first retail purchaser, a Defect Information Report will be required. Should you have any questions regarding your company's obligations in this matter, please contact Alex Ansley of NHTSA RMD at (202) 493-0481 or alexander.ansley@dot.gov.

In view of this safety risk, and your company's obligations under Federal law, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective power seat bases. 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 manufacture motor vehicles and has not resold this equipment, but this equipment is in your possession, NHTSA recommends contacting Ricon for the appropriate action.

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.

To summarize, RMD asks that you respond to this letter identifying the following:

1. Your company's role in the distribution of this equipment (i.e. dealer, distributor, vehicle manufacturer, etc.).

2. If you have not incorporated this equipment into new motor vehicles you manufacture, please so state. Please also contact Ricon at 1-818-267-3000 referring to recall 08E-046 to assist Ricon with contacting your retail customers.

3. If you have incorporated this equipment into new motor vehicles you manufacture, please reply with the aforementioned Defect Information Report and review your obligations to provide 6 quarterly reports.

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 EQ10-001.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

08E-046
(4 pages)

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

July 30, 2008

Mr. Daniel Smith
Associate Administrator for Enforcement
NHTSA - 215
1200 New Jersey Ave., SE
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report
Reference: Ricon 6-Way Power Transfer Seat Base

Dear Sir:

On July 30, 2008, Ricon Corporation identified that a potential defect may exist in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 – Defect and Noncompliance Reports.

This report was prepared on July 30, 2008

1. The full corporate name of the fabricating manufacturer is:

   Ricon Corporation
   A Wabtec Company
   7900 Nelson Road
   Panorama City, CA 91402

   The corporate officials that the agency should contact with respect to this recall are:

   Stanton Saucier
   General Manager
   ssaucier@wabtec.com
   Phone 818 267-3016
   Fax 818 267-3187

   Oscar Pardinas
   Vice President of Sales and Marketing
   opardinas@wabtec.com
   Phone 818 267-3085
   Fax 818 267-3155

Sincerely,

Oscar Pardinas
Vice President of Sales and Marketing

RECEIVED
2008 AUGUST 7
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

Ricon
A Wabtec company

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report

I. Identify the Recalled Items of Equipment

2. **Identify the Items of Equipment Involved in this Recall:**

   a. This recall applies to pivoting plate used on Ricon's 6-way power transfer seat base.

   b. There are three Model names for these 6-way power transfer seat bases:

      (1) Standard 6-way Power Seat Base (Right turn)
      (2) R1209-L 6-way Power Seat Base (Left turn)
      (3) R1209-E 6-way Power Seat Base (Extended travel)

   c. The model numbers for the seat bases are:

      (1) R1209
      (2) R1209-L
      (3) R1209-E

II. Identify the Recall Population

3. **Identify the Recall Population:** 6-way Power Seat Bases manufactured between January 1, 2006, and May 14, 2007 inclusive.

4. **Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 50%

III. Describe the Defect or Noncompliance

5. **Describe the defect or noncompliance:** The weld on the pivot pin, which is welded to the swivel plate may fail

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www.Wabtec.com

Describe the cause(s) of the defect or noncompliance: A poor (cold) weld

Describe the consequence(s) of the defect or noncompliance: The occupant, seated in a seat attached to the pivoting plate, may fall of the seat.

Identify any warning which can (a) precede or (b) occur: The seat may appear crooked or out of vertical alignment

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

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

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.**

- March 2006 - Received notification from European staff of a failure - no injury
- April 2006 - Received notification of a domestic failure from Lift Aids of Fortworth TX, - no injury

- Between May 2006 and October 2006, Ricon recalled 126, 6-way Power Seat Bases in various inventories
- Between May 2006 and October 2006 Ricon:
    - Inspected and found no problems in 35, 6-way Power Seat Bases
    - Repaired 78 questionable 6-way Power Seat Bases
    - Scrapped 13, 6-way Power Seat Base which we were not able to ascertain condition

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.** N/A

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V. Identify the Remedy

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

Inspect the swivel plate weldment per Ricon Service Bulletin RSB105.A. Replace swivel plate as necessary.

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

The Replacement parts can be distinguished from the recall components by the reduced number of components. The recalled weldment consists of a pin a bushing and a swivel pate. The new components consist of a pin and a swivel plate only.

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.

The recall condition was corrected in production on all lifts manufactured after May 14, 2007.

VI. Identify the Recall Schedule

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

Ricon Corporation anticipates the recall campaign will begin in September 1, 2008. At that time, manufacturers, distributors and dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population.

VII. Furnish Recall Communications

9. **Furnish Recall Communications:** Attached for NHTSA review and approval.