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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 0 2 2010

Durham School Services, L.P.
250 West 53rd St. North
Wichita, KS 67204

NVS-215aa
EQ10-003

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured.

In a letter dated February 1, 2010, Indiana Mills & Manufacturing, Inc. (IMMI) notified the National Highway Traffic Safety Administration (NHTSA) that it sold certain school bus seats, manufactured between October 6, 2009 and January 25, 2010, and that these seats did not meet Federal Motor Vehicle Safety Standard (FMVSS) No. 222, "School bus passenger seating and crash protection", when installed in a school bus application. IMMI stated that certain seat cushion locking mechanisms are capable of being misaligned during vehicle assembly or after the vehicle is in use. A seat cushion with a misaligned locking mechanism might not be able to meet the requirements of FMVSS No. 222 as it would not allow the cushion to remain attached to the seat during a certain threshold of upward force. Should a school bus seat cushion become detached from the seat during vehicle operation, personal injury is possible to the seat occupant(s).

IMMI has advised us that it shipped these school bus seats to Durham School Services, L.P. (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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.

★★★★★
NHTSA

This letter serves to remind you of your company's responsibilities, and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliant seats; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and IMMI; and an identification of your company's role in the distribution chain for potentially affected school bus seats. The full requirements for the information that you must provide may be found at 49 CFR 573.6. In addition to that required information, please include the date on which you received notification of this matter from IMMI.

In view of the risk of injury, 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 noncompliant school bus seats. 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 Noncompliance Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

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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 does not agree with the decision made by IMMI that the school bus seats are noncompliant, please provide an explanation for your company's position. Please include any research findings or test results that led to your company's conclusion regarding this safety issue. If, contrary to IMMI's information, your company has not received any of this equipment, please so state. If your company resold any of the equipment other than in its vehicles, please identify the purchaser by name.

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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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 **EQ10-003**. 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 submission 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

IMMI

Bringing Safety to People



February 1, 2010

Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Apparent Noncompliance with FMVSS No. 222

Dear Mr. Smith:

I am writing to inform you that Indiana Mills & Manufacturing, Inc. (IMMI), a manufacturer of seats used in school buses, has discovered a manufacturing concern that causes school buses equipped with certain of the seats that it manufactured between October 6, 2009 and January 25, 2010 to not comply with one of the performance requirements of Federal Motor Vehicle Safety Standard (FMVSS) No. 222, "School bus passenger seating and crash protection." Although FMVSS No. 222 applies only to school buses and not the seats themselves – and therefore IMMI is not required to submit a noncompliance information report to NHTSA pursuant to 49 CFR Part 573 – IMMI wants to bring this matter to your attention.

IMMI has discovered that the seat cushion retention locking mechanism in certain of its school bus seats can be misaligned. If the mechanism is misaligned, the seat will not meet the new seat cushion retention requirements specified in S5.1.5 of FMVSS No. 222. Effective October 21, 2009, S5.1.5 of FMVSS No. 222, "Seat Cushion Retention," requires the following:

> In the case of school bus passenger seats equipped with seat cushions, with all manual attachment devices between the seat and the seat cushion in the manufacturer's designated position for attachment, the seat cushion shall not separate from the seat at any attachment point when subjected to an upward force in newtons of 5 times the mass of the seat cushion in kilograms and multiplied by 9.8 m/s^2 , applied in any period of not less than 1 nor more than 5 seconds, and maintained for 5 seconds.

In the seats at issue, the seat cushion locking mechanism is capable of being misaligned, either during seat or vehicle assembly or after the vehicle is in use. A seat cushion with a misaligned locking mechanism would not be able to meet the new performance requirements specified above.

18881 U.S. 31 North • P.O. Box 408 • Westfield, IN 46074-0408 U.S.A. • P: 317.896.9531 • F: 317.896.2172 • www.immi.com

The total number of seats that are subject to this misalignment issue is 2,296. However, because the seats were manufactured and shipped to customers recently, many of them have not been installed on buses, and some of the buses on which the covered seats were installed have not yet been released to the public. In fact, IMMI has already worked with bus manufacturers to install a guide bracket on many of the covered seats, which positively locates the locking mechanism relative to the designed latch position. The bracket eliminates the possibility of misalignment, thus ensuring that the vehicles will comply with the S5.1.5 of FMVSS No. 222.

The seats covered by this letter were sold to the following entities. IMMI does not know how many buses, if any, each of these manufacturers has manufactured and sold with seats containing an unremedied locking mechanism.

1. Bus Air Manufacturing
   6630 East Highway 114
   Rhome, TX 76078

2. Bus West
   TransWest Truck Center
   10150 Cherry Avenue
   Fontana, CA 92335

3. Collins Bus Corp
   415 West 6th Street
   South Hutchinson, KS 67505

4. Durham School Services, L.P.
   250 West 53RD St. N.
   Wichita, KS 67204

5. First Group America
   140 Shawnee
   Buffalo, NY 14215

6. Matthews Buses
   7313 Northern Blvd.
   Syracuse Parts Location
   East Syracuse, NY 13057

7. H A DEHART & SON INC
   311 Crown Point Road
   FTBB9
   Thorofore, NJ 08086

8. IC Corp of Oklahoma, LLC
   2322 North Mingo Rd.
   Tulsa, OK 74116

9. IC Corp.
751 South Harkrider
Conway, AR 72032

10. Sartin Services, Inc.
Trans/South Services, Inc.
71 Highway 341 North
Fort Valley, GA 31030

11. Starcraft Bus
2367 Century Dr.
Goshen, IN 46528

12. State of Delaware Laurel School District
1160 S. Central Avenue
Laurel, DE 19956

13. Thomas Built Buses, Inc.
1408 Courtesy Road
High Point, NC 27260

14. Transportation South, Inc.
1400 McCain Parkway
Pelham, AL 35124

IMMI will expeditiously notify each of the vehicle manufacturers identified above of this situation, and it will work with them to assure that any noncompliant buses are remedies promptly.

If you have any questions, please contact James Johnson, Corporate Director of Sales. He can be reached at (317) 867-8143 or James.Johnson@imminet.com. Alternatively, you can contact me at (317) 867-8192 or steve.davis@imminet.com.

Sincerely,

Steven R. Davis
General Counsel

cc: George Person
Chief, Recall Management Division
Office of Defects Investigation

U.S. Department
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**National Highway
Traffic Safety
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1200 New Jersey Avenue SE
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IMMI has advised us that it shipped these school bus seats to Bus Air Manufacturing (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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.

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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.

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George H. Person
Chief, Recall Management Division
Office of Defects Investigation
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www.nhtsa.gov

U.S. Department
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1200 New Jersey Avenue SE
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Collins Bus Corp
415 West 6th St
South Hutchinson, KS 67505

NVS-215aa
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In view of the risk of injury, 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 noncompliant school bus seats. 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.

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George H. Person
Chief, Recall Management Division
Office of Defects Investigation
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1200 New Jersey Avenue SE
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First Group America
140 Shawnee
Buffalo, NY 14215

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IC Corp Of Oklahoma, LLC
2322 North Mingo Rd
Tulsa, OK 74116

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The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured.

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IMMI has advised us that it shipped these school bus seats to IC Corp Of Oklahoma, LLC (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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 the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliant seats; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and IMMI; and an identification of your company's role in the distribution chain for potentially affected school bus seats. The full requirements for the information that you must provide may be found at 49 CFR 573.6. In addition to that required information, please include the date on which you received notification of this matter from IMMI.

In view of the risk of injury, 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 noncompliant school bus seats. 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 Noncompliance 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 does not agree with the decision made by IMMI that the school bus seats are noncompliant, please provide an explanation for your company's position. Please include any research findings or test results that led to your company's conclusion regarding this safety issue. If, contrary to IMMI's information, your company has not received any of this equipment, please so state. If your company resold any of the equipment other than in its vehicles, please identify the purchaser by name.

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

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

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ10-003**. 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 submission 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

NHTSA
www.nhtsa.gov

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 0 2 2010

IC Corp.
751 South Harkrider
Conway, AR 72032

NVS-215aa
EQ10-003

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured.

In a letter dated February 1, 2010, Indiana Mills & Manufacturing, Inc. (IMMI) notified the National Highway Traffic Safety Administration (NHTSA) that it sold certain school bus seats, manufactured between October 6, 2009 and January 25, 2010, and that these seats did not meet Federal Motor Vehicle Safety Standard (FMVSS) No. 222, "School bus passenger seating and crash protection", when installed in a school bus application. IMMI stated that certain seat cushion locking mechanisms are capable of being misaligned during vehicle assembly or after the vehicle is in use. A seat cushion with a misaligned locking mechanism might not be able to meet the requirements of FMVSS No. 222 as it would not allow the cushion to remain attached to the seat during a certain threshold of upward force. Should a school bus seat cushion become detached from the seat during vehicle operation, personal injury is possible to the seat occupant(s).

IMMI has advised us that it shipped these school bus seats to IC Corp. (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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.

★★★★★
NHTSA

This letter serves to remind you of your company's responsibilities, and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliant seats; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and IMMI; and an identification of your company's role in the distribution chain for potentially affected school bus seats. The full requirements for the information that you must provide may be found at 49 CFR 573.6. In addition to that required information, please include the date on which you received notification of this matter from IMMI.

In view of the risk of injury, 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 noncompliant school bus seats. 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 Noncompliance 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 does not agree with the decision made by IMMI that the school bus seats are noncompliant, please provide an explanation for your company's position. Please include any research findings or test results that led to your company's conclusion regarding this safety issue. If, contrary to IMMI's information, your company has not received any of this equipment, please so state. If your company resold any of the equipment other than in its vehicles, please identify the purchaser by name.

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

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

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ10-003**. 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 submission 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

NHTSA
www.nhtsa.gov

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 0 2 2010

Starcraft Bus
2367 Century Dr.
Goshen, IN 46528

NVS-215aa
EQ10-003

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured.

In a letter dated February 1, 2010, Indiana Mills & Manufacturing, Inc. (IMMI) notified the National Highway Traffic Safety Administration (NHTSA) that it sold certain school bus seats, manufactured between October 6, 2009 and January 25, 2010, and that these seats did not meet Federal Motor Vehicle Safety Standard (FMVSS) No. 222, "School bus passenger seating and crash protection", when installed in a school bus application. IMMI stated that certain seat cushion locking mechanisms are capable of being misaligned during vehicle assembly or after the vehicle is in use. A seat cushion with a misaligned locking mechanism might not be able to meet the requirements of FMVSS No. 222 as it would not allow the cushion to remain attached to the seat during a certain threshold of upward force. Should a school bus seat cushion become detached from the seat during vehicle operation, personal injury is possible to the seat occupant(s).

IMMI has advised us that it shipped these school bus seats to Starcraft Bus (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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 the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliant seats; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and IMMI; and an identification of your company's role in the distribution chain for potentially affected school bus seats. The full requirements for the information that you must provide may be found at 49 CFR 573.6. In addition to that required information, please include the date on which you received notification of this matter from IMMI.

In view of the risk of injury, 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 noncompliant school bus seats. 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 Noncompliance 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 does not agree with the decision made by IMMI that the school bus seats are noncompliant, please provide an explanation for your company's position. Please include any research findings or test results that led to your company's conclusion regarding this safety issue. If, contrary to IMMI's information, your company has not received any of this equipment, please so state. If your company resold any of the equipment other than in its vehicles, please identify the purchaser by name.

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

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

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ10-003**. 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 submission 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

NHTSA
www.nhtsa.gov

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 0 2 2010

State of DE - Laurel School Dist.
1160 S. Central Avenue
Laurel, DE 19956

NVS-215aa
EQ10-003

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured.

In a letter dated February 1, 2010, Indiana Mills & Manufacturing, Inc. (IMMI) notified the National Highway Traffic Safety Administration (NHTSA) that it sold certain school bus seats, manufactured between October 6, 2009 and January 25, 2010, and that these seats did not meet Federal Motor Vehicle Safety Standard (FMVSS) No. 222, "School bus passenger seating and crash protection", when installed in a school bus application. IMMI stated that certain seat cushion locking mechanisms are capable of being misaligned during vehicle assembly or after the vehicle is in use. A seat cushion with a misaligned locking mechanism might not be able to meet the requirements of FMVSS No. 222 as it would not allow the cushion to remain attached to the seat during a certain threshold of upward force. Should a school bus seat cushion become detached from the seat during vehicle operation, personal injury is possible to the seat occupant(s).

IMMI has advised us that it shipped these school bus seats to State of DE - Laurel School Dist. (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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.

NHTSA

This letter serves to remind you of your company's responsibilities, and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliant seats; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and IMMI; and an identification of your company's role in the distribution chain for potentially affected school bus seats. The full requirements for the information that you must provide may be found at 49 CFR 573.6. In addition to that required information, please include the date on which you received notification of this matter from IMMI.

In view of the risk of injury, 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 noncompliant school bus seats. 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 Noncompliance 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 does not agree with the decision made by IMMI that the school bus seats are noncompliant, please provide an explanation for your company's position. Please include any research findings or test results that led to your company's conclusion regarding this safety issue. If, contrary to IMMI's information, your company has not received any of this equipment, please so state. If your company resold any of the equipment other than in its vehicles, please identify the purchaser by name.

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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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 **EQ10-003**. 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 submission 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

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 0 2 2010

Transportation South, Inc.
1400 McCain Parkway
Pelham, AL 35124

NVS-215aa
EQ10-003

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured.

In a letter dated February 1, 2010, Indiana Mills & Manufacturing, Inc. (IMMI) notified the National Highway Traffic Safety Administration (NHTSA) that it sold certain school bus seats, manufactured between October 6, 2009 and January 25, 2010, and that these seats did not meet Federal Motor Vehicle Safety Standard (FMVSS) No. 222, "School bus passenger seating and crash protection", when installed in a school bus application. IMMI stated that certain seat cushion locking mechanisms are capable of being misaligned during vehicle assembly or after the vehicle is in use. A seat cushion with a misaligned locking mechanism might not be able to meet the requirements of FMVSS No. 222 as it would not allow the cushion to remain attached to the seat during a certain threshold of upward force. Should a school bus seat cushion become detached from the seat during vehicle operation, personal injury is possible to the seat occupant(s).

IMMI has advised us that it shipped these school bus seats to Transportation South, Inc. (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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.

NHTSA

This letter serves to remind you of your company's responsibilities, and to request that you supply the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliant seats; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and IMMI; and an identification of your company's role in the distribution chain for potentially affected school bus seats. The full requirements for the information that you must provide may be found at 49 CFR 573.6. In addition to that required information, please include the date on which you received notification of this matter from IMMI.

In view of the risk of injury, 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 noncompliant school bus seats. 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.

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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 does not agree with the decision made by IMMI that the school bus seats are noncompliant, please provide an explanation for your company's position. Please include any research findings or test results that led to your company's conclusion regarding this safety issue. If, contrary to IMMI's information, your company has not received any of this equipment, please so state. If your company resold any of the equipment other than in its vehicles, please identify the purchaser by name.

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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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 **EQ10-003**. 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 submission 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

NHTSA
www.nhtsa.gov

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 0 2 2010

Matthews Buses
7313 Northern Blvd.
Syracuse Parts Location
East Syracuse, NY 13057

NVS-215aa
EQ10-003

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured.

In a letter dated February 1, 2010, Indiana Mills & Manufacturing, Inc. (IMMI) notified the National Highway Traffic Safety Administration (NHTSA) that it sold certain school bus seats, manufactured between October 6, 2009 and January 25, 2010, and that these seats did not meet Federal Motor Vehicle Safety Standard (FMVSS) No. 222, "School bus passenger seating and crash protection", when installed in a school bus application. IMMI stated that certain seat cushion locking mechanisms are capable of being misaligned during vehicle assembly or after the vehicle is in use. A seat cushion with a misaligned locking mechanism might not be able to meet the requirements of FMVSS No. 222 as it would not allow the cushion to remain attached to the seat during a certain threshold of upward force. Should a school bus seat cushion become detached from the seat during vehicle operation, personal injury is possible to the seat occupant(s).

IMMI has advised us that it shipped these school bus seats to Matthews Buses (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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 the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliant seats; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and IMMI; and an identification of your company's role in the distribution chain for potentially affected school bus seats. The full requirements for the information that you must provide may be found at 49 CFR 573.6. In addition to that required information, please include the date on which you received notification of this matter from IMMI.

In view of the risk of injury, 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 noncompliant school bus seats. 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 Noncompliance 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 does not agree with the decision made by IMMI that the school bus seats are noncompliant, please provide an explanation for your company's position. Please include any research findings or test results that led to your company's conclusion regarding this safety issue. If, contrary to IMMI's information, your company has not received any of this equipment, please so state. If your company resold any of the equipment other than in its vehicles, please identify the purchaser by name.

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

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

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ10-003**. 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 submission 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

NHTSA
www.nhtsa.gov

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 0 2 2010

H A Dehart & Son Inc
311 Crown Point Rd
FTBB9
Thorofore, NJ 08086

NVS-215aa
EQ10-003

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured.

In a letter dated February 1, 2010, Indiana Mills & Manufacturing, Inc. (IMMI) notified the National Highway Traffic Safety Administration (NHTSA) that it sold certain school bus seats, manufactured between October 6, 2009 and January 25, 2010, and that these seats did not meet Federal Motor Vehicle Safety Standard (FMVSS) No. 222, "School bus passenger seating and crash protection", when installed in a school bus application. IMMI stated that certain seat cushion locking mechanisms are capable of being misaligned during vehicle assembly or after the vehicle is in use. A seat cushion with a misaligned locking mechanism might not be able to meet the requirements of FMVSS No. 222 as it would not allow the cushion to remain attached to the seat during a certain threshold of upward force. Should a school bus seat cushion become detached from the seat during vehicle operation, personal injury is possible to the seat occupant(s).

IMMI has advised us that it shipped these school bus seats to H A Dehart & Son Inc (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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 the required report. In that report, please be sure to include an identification and description of your company's vehicle(s) that potentially contain the noncompliant seats; a chronology of all principal events involving the determination that a noncompliance may exist in your company's vehicle(s), including related communications between your company and IMMI; and an identification of your company's role in the distribution chain for potentially affected school bus seats. The full requirements for the information that you must provide may be found at 49 CFR 573.6. In addition to that required information, please include the date on which you received notification of this matter from IMMI.

In view of the risk of injury, 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 noncompliant school bus seats. 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 Noncompliance 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 does not agree with the decision made by IMMI that the school bus seats are noncompliant, please provide an explanation for your company's position. Please include any research findings or test results that led to your company's conclusion regarding this safety issue. If, contrary to IMMI's information, your company has not received any of this equipment, please so state. If your company resold any of the equipment other than in its vehicles, please identify the purchaser by name.

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

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

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ10-003**. 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 submission 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

NHTSA
www.nhtsa.gov

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

1200 New Jersey Avenue SE
Washington, DC 20590

APR 0 2 2010

Sartin Services, Inc.
Trans/South Services, Inc.
71 Highway 341 North
Fort Valley, GA 31030

NVS-215aa
EQ10-003

Dear Sir or Madam,

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured.

In a letter dated February 1, 2010, Indiana Mills & Manufacturing, Inc. (IMMI) notified the National Highway Traffic Safety Administration (NHTSA) that it sold certain school bus seats, manufactured between October 6, 2009 and January 25, 2010, and that these seats did not meet Federal Motor Vehicle Safety Standard (FMVSS) No. 222, "School bus passenger seating and crash protection", when installed in a school bus application. IMMI stated that certain seat cushion locking mechanisms are capable of being misaligned during vehicle assembly or after the vehicle is in use. A seat cushion with a misaligned locking mechanism might not be able to meet the requirements of FMVSS No. 222 as it would not allow the cushion to remain attached to the seat during a certain threshold of upward force. Should a school bus seat cushion become detached from the seat during vehicle operation, personal injury is possible to the seat occupant(s).

IMMI has advised us that it shipped these school bus seats to Sartin Services, Inc. (your company) and we are concerned that you may have included them in new motor vehicles that you manufactured. A copy of IMMI's letter 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 noncompliant 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.

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In view of the risk of injury, 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 noncompliant school bus seats. 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.

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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 does not agree with the decision made by IMMI that the school bus seats are noncompliant, please provide an explanation for your company's position. Please include any research findings or test results that led to your company's conclusion regarding this safety issue. If, contrary to IMMI's information, your company has not received any of this equipment, please so state. If your company resold any of the equipment other than in its vehicles, please identify the purchaser by name.

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Sincerely,

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

Enclosures

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Sincerely,

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

Enclosures