Ricon
A Wabtec company

Ricon Corporation
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

April 9, 2010

Mr. Alexander Ainsley
National Highway Traffic Safety Administration

Re: NVS-215aa, EQ10-001, 08E-046

Mr. Ainsley,

In response to the questions in the above referenced document:

1). Provide the list of all customers – see attached

2). Seat bases for OEM use – Ricon distributes the seat base in question through Vantage Mobility International (VMI). VMI resells the seatbase to through their dealer network. Ricon has no knowledge of any seatbases that are used as OEM components Ricon's understanding is that seatbases are installed into customer or dealer owned vehicles, or as replacement (not original equipment).

3). Seat bases for replacement use - Ricon distributes the seat base in question through Vantage Mobility International (VMI). VMI resells the seatbase to through their dealer network. Ricon has no knowledge of how many seatbases were aftermarket and how many were replacements. Ricon sold a small number of seatbases through Ricon's Commercial dealer network as aftermarket components. Please refer to list of customers.

4). All of the seatbases affected were sold prior to January 1, 2010. As detailed to Ms Timian in our email of February 5, 2010, here are the facts:

The product involved in this recall – Ricon 6-way Power Transfer Seat Base (PSB) -- is a Ricon accessory item, which can be used in disabled passenger vehicles to allow users to transfer from their wheelchair to the front seat. This product is sold primarily through Vantage Mobility International (VMI), our exclusive dealer in the Personal (consumer retail) market in North America.

In January of 2004, Ricon licensed to VMI the rights to distribute products, including the PSB, in the Personal market. As part of this sale, Ricon generally gave up the right to sell to, communicate, solicit or otherwise engage other dealers in the Personal market during the term of the agreement.

Ricon
A Wabtec company

Ricon Corporation
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

On or about May 14, 2007, Ricon received a report from VMI that a seatbase had failed during installation at Lift Aids in Eulass TX. Ricon and VMI immediately identified the population of affected seatbases. Ricon and VMI immediately accounted for, inspected, repaired and quarantined recently sold material, and all unsold material. The quarantined seatbases were repaired and brought up to specifications. The design of the swivel post weldment was changed prior to resuming production, to further safeguard the assembly.

Although the actual population of affected units was small and limited to a few day's production, Ricon agreed in July 2008 to recall units produced between Jan 1, 2006 and May 14, 2007. ODI insisted on this date range because they had not received notice of the one failure.

Around the time when everything was in place to begin the recall process, Ricon and VMI became involved in a contract dispute that resulted in litigation that was not resolved until late 2009. During which time, the PSB recall was overlooked. This was explained in detail in the communication with Ms. Timian.

There have been no other reports of this failure in the Ricon PSB. Ricon believes that containment of non-conforming material was successful. Regardless, Ricon agreed to the PSB recall and is prepared to proceed with the recall process.

Ricon has discussed the recall matter with VMI and is prepared to go forward. VMI has expressed its desire to perform the notifications of its customers directly. Both Ricon and VMI dealers will be authorized to perform the recall remedy.

I hope this explains your questions. If you require further information, feel free to contact me directly,

Best regards,

Oscar Pardinas
V.P. Sales & Marketing
Ricon Corporation

Ricon
A Wabtec company

Ricon Corporation
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

February 5, 2010

Jennifer Timian
Recall Management Division (NVS-215)
Office of Defects Investigation
NHTSA

Dear Ms. Timian,

As requested, here is the background on the delay for recall 08E-046:

The product involved in this recall – Ricon 6-way Power Transfer Seat Base (PSB) -- is a Ricon accessory item, which can be used in vehicle conversions to allow users to transfer from their wheelchair to the front seat. This product is sold primarily through Vantage Mobility International (VMI), our exclusive dealer in the Personal (consumer retail) market in North America.

In January of 2004, Ricon licensed to VMI the rights to distribute products, including the PSB, in the Personal market. As part of this sale, Ricon generally gave up the right to sell to, communicate, solicit or otherwise engage other dealers in the Personal market during the term of the agreement.

Ricon discussed the PSB recall with VMI in 2008. Around the time when everything was in place to begin the recall process, Ricon and VMI became involved in a contract dispute that resulted in litigation that was not resolved until late 2009. During which time, the PSB recall was overlooked.

As discussed during recent telephone conversations with your office, there have been no incidents involving the PSB since the filing of the 573. Ricon believes that containment of non-conforming material was successful. Regardless, Ricon agreed to the PSB recall and will proceed with the recall process.

Ricon has discussed the recall matter with VMI and is prepared to go forward. VMI has expressed its desire to perform the notifications of its customers directly. Both Ricon and VMI dealers will be authorized to perform the recall remedy.

Regards,

Oscar Pardinas
V.P. Sales & Marketing
Ricon Corporation
7900 Nelson Road, Panorama City, CA 91402
(818) 267-3085
opardinas@wabtec.com

cc: David Eaton/VMI

ItemCode	DelDate	QtyOrd	Country	CustName	Ser
R1209	9/28/2006 0:00	1	US	ARKANSAS CONVERSION CENTER	0
R1209	1/15/2007 0:00	1	US	ARKANSAS CONVERSION CENTER	0
R1209	3/8/2006 0:00	1	US	HOGLUND BUS CO., INC.	0
R1209	3/27/2006 0:00	1	US	HOGLUND BUS CO., INC.	0
R1209	10/13/2006 0:00	1	US	ILDERTON CONVERSION CO	0
R1209	4/10/2007 0:00	1	US	MALLEY INDUSTRIES INC.	0
R1209	1/12/2006 0:00	1	US	NEW ENGLAND WHEELS INC	0
R1209	1/26/2006 0:00	1	US	NEW ENGLAND WHEELS INC	0
R1209	1/17/2007 0:00	1	US	NEW ENGLAND WHEELS INC	0
R1209	7/14/2006 0:00	1	US	NORTHERN BUS SALES, INC.	0
R1209	2/24/2006 0:00	1	US	RICON CORP. - PRODUCT SUPPORT	0
R1209	6/27/2006 0:00	1	US	SUNSET VANS, INC.	0
R1209	1/23/2006 0:00	1	US	SUNSET VANS, INC.	0
R1209	8/8/2006 0:00	1	US	SUNSET VANS, INC.	0
R1209	11/14/2006 0:00	1	US	SUNSET VANS, INC.	0
R1209	5/16/2006 0:00	1	US	THE MOBILITY SPECIALIST	0
R1209	12/12/2006 0:00	1	US	THE MOBILITY SPECIALIST	0
R1209	4/20/2007 0:00	1	US	THE MOBILITY SPECIALIST	0
R1209	3/23/2007 0:00	1	US	THE MOBILITY SPECIALIST	0
R1209	1/24/2007 0:00	1	US	THE MOBILITY SPECIALIST	0
R1209	3/14/2006 0:00	2	US	THE MOBILITY SPECIALIST	0
R1209	5/16/2006 0:00	1	US	THE MOBILITY SPECIALIST	0
R1209	5/23/2006 0:00	2	US	THE MOBILITY SPECIALIST	0
R1209	1/10/2007 0:00	1	US	THOMAS BUS SALES OF IA	0
R1209	3/28/2006 0:00	15	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/28/2006 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	5/4/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	5/19/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	6/13/2006 0:00	3	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	6/23/2006 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	6/30/2006 0:00	12	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	7/14/2006 0:00	15	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	7/18/2006 0:00	5	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	7/25/2006 0:00	9	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	7/28/2006 0:00	20	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	8/4/2006 0:00	12	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	8/9/2006 0:00	3	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	8/25/2006 0:00	15	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	8/29/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	9/15/2006 0:00	16	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	9/22/2006 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	9/28/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	10/27/2006 0:00	7	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	11/20/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	11/22/2006 0:00	11	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	12/8/2006 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	12/8/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	12/15/2006 0:00	15	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	1/5/2007 0:00	19	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	1/12/2007 0:00	5	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/2/2007 0:00	20	US	VANTAGE MOBILITY INTERNATIONAL	0

R1209	2/9/2007 0:00	25	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/21/2007 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/28/2007 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/28/2007 0:00	4	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	1/10/2006 0:00	4	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	1/19/2006 0:00	40	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	2/21/2006 0:00	5	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/28/2006 0:00	11	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	3/30/2006 0:00	26	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	3/31/2006 0:00	-2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/7/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/7/2006 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	5/17/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	5/27/2006 0:00	15	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	6/2/2006 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	6/8/2006 0:00	3	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	6/21/2006 0:00	12	US	VANTAGE MOBILITY INTERNATIONAL	3
R1209	6/23/2006 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	6/27/2006 0:00	5	US	VANTAGE MOBILITY INTERNATIONAL	2
R1209	7/12/2006 0:00	3	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	7/13/2006 0:00	4	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	7/14/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	10/3/2006 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	11/3/2006 0:00	4	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	11/10/2006 0:00	24	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	12/1/2006 0:00	20	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	12/1/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	12/8/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	1/31/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/9/2007 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/16/2007 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/28/2007 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/30/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	4/9/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/21/2007 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/26/2007 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	5/7/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	1/24/2006 0:00	7	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	1/25/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	2
R1209	1/27/2006 0:00	6	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/8/2006 0:00	7	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/10/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/14/2006 0:00	20	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/10/2006 0:00	15	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/21/2006 0:00	60	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	3/21/2006 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/28/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	2
R1209	3/30/2006 0:00	3	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/1/2006 0:00	16	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	4/1/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/24/2006 0:00	12	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	5/12/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0

R1209	5/26/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	6/8/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	2
R1209	6/8/2006 0:00	15	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	6/14/2006 0:00	25	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	6/14/2006 0:00	4	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	6/23/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	6/26/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	5
R1209	7/11/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	8/22/2006 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	8/25/2006 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	9/29/2006 0:00	11	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	10/20/2006 0:00	18	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	11/3/2006 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/16/2007 0:00	7	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/16/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209-E	2/16/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	2/23/2007 0:00	4	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	2/28/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	3/13/2007 0:00	6	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	3/23/2007 0:00	5	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	3/30/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/13/2007 0:00	15	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/27/2007 0:00	25	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/27/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	5/11/2007 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/7/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/7/2006 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/27/2006 0:00	25	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	3/15/2006 0:00	17	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/12/2006 0:00	6	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	4/12/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	5/5/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	8/23/2006 0:00	3	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	8/25/2006 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	9/8/2006 0:00	18	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	10/6/2006 0:00	5	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	10/13/2006 0:00	12	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	10/19/2006 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	11/14/2006 0:00	2	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	11/17/2006 0:00	11	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	12/22/2006 0:00	5	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	1/25/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	1/26/2007 0:00	20	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	2/1/2007 0:00	10	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	2/19/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209-E	2/23/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	1
R1209	3/27/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/10/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/13/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/20/2007 0:00	7	US	VANTAGE MOBILITY INTERNATIONAL	0
R1209	4/24/2007 0:00	1	US	VANTAGE MOBILITY INTERNATIONAL	0