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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Mobility Works
810 Moe Drive
Akron, OH 44310

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Mobility Works (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Mobility Transportation Services Inc.
4200 Koppernick Ste A-3
Canton, MI 48187

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Mobility Transportation Services Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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;

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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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
National Van Builders, Inc.
80 Pine Street
Attleboro, MA 02703-3907

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to National Van Builders, Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Quality Van Sales, Inc.
349 Old Colony Road, Route 123
Norton, MA 02766-2016

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Quality Van Sales, Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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;

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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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
New England Wheels Inc.
33 Manning Rd.
Billerica, MA 01821-5728

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

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Braun reported to NHTSA that it sold [redacted] of these defective units to New England Wheels Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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

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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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Van Conversions Inc
925 S.Trooper Road
Norristown, PA 19403

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Van Conversions Inc (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Mobility Services
19-57 Steinway St
Astoria, NY 11105

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Mobility Services (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Creative Bus Sales, Inc.
13501 Benson Ave
Chino, CA 91710

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Creative Bus Sales, Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

AUG 2 1 2012

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail
Warranty/ Compliance Department
National Bus Sales
800 Pickens Drive Ext.
Marietta, GA 30062

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to National Bus Sales (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Sonny Merryman Inc.
U. S. Route 29 South
Evington, VA 24550

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Sonny Merryman Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Siebert Mobility, Inc.
405 Coolidge St
Glenwood, IA 51534

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Siebert Mobility, Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Sunset Vans, Inc.
8851 Lakewood Boulevard
Downey, CA 90240-2301

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Sunset Vans, Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Ride-Away Corporation
54 Wentworth Ave
Londonderry, NH 03053

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Ride-Away Corporation (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Diamond State Bus Company
450 South Amity Rd
Conway, AR 72032

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Diamond State Bus Company (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
C&C Mobility
68 N. Wallace Ln
Sturgis, KY 42459

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to C&C Mobility (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

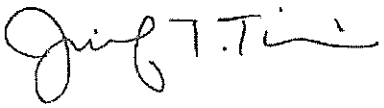
This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant 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 EQ12-005.

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,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
The Mobility Specialist
490 Capricorn Street
Brea, CA 92821

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to The Mobility Specialist (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

AUG 2 1 2012

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail
Warranty/ Compliance Department
Ilderton Conversions
701 South Main Street
High Point, NC 27261-0350

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Ilderton Conversions (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Cummnings Mobility Conversions
6540 Jansen Ave, NE
Albertville, MN 55301

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Cummnings Mobility Conversions (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Keystone Coach Works
4786 Liberty Road
Bethel Park, PA 15102

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Keystone Coach Works (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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;

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e. the approximate date on which the dealer notification will be completed.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

AUG 2 1 2012

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail
Warranty/ Compliance Department
American Bus and Accessories, Inc.
123 City Centre Drive
Cincinatti, OH 45216

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to American Bus and Accessories, Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
United Access LLC
9389 Natural Bridge
St. Louis, MO 63134

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to United Access LLC (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Fenton Mobility Products
1209 East 2nd Street
Jamestown, NY 14701

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Fenton Mobility Products (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

AUG 2 1 2012

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail
Warranty/ Compliance Department
Nor-Cal Mobility
1300 Nord Ave
Chico, CA 95926

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Nor-Cal Mobility (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Advanced Wheels of Technology, Inc.
15F International Dr
East Granby, CT 06026

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Advanced Wheels of Technology, Inc. (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Clock Mobility
6700 Clay Ave, SW
Grand Rapids, MI 49548

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Clock Mobility (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

AUG 2 1 2012

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail
Warranty/ Compliance Department
Midwest Transit Equipment
4500 S Indianapolis Rd
Whitestown, IN 46075

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Midwest Transit Equipment (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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 Part 573 Defect 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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

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

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 2 1 2012

Via USPS Certified Mail
Warranty/ Compliance Department
Gresham Driving Aids
30800 Wixom Road
Wixom, MI 48393

NVS-215aa
EQ12-005
12E-002

Re: Safety Recall 12E-002

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Braun Corporation (Braun) wheelchair lifts that Braun has decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-005.

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured or altered, and to remind you of your responsibilities under Federal law.

In a letter dated January 31, 2012, Braun notified the NHTSA that it had decided a defect exists in certain Century-2 and Vista-2 wheelchair lifts, manufactured from November 20, 2006 through September 10, 2010, and installed on various vans and transit buses. Over time and with frequent use, the roll stop latches on the outer barrier may become bent or misaligned. Should this occur, a wheelchair occupant may defeat or ride over the insufficiently latched roll stop. If this occurs when the lift platform is in an elevated position, the wheelchair's occupant could fall and sustain injury. NHTSA assigned recall number 12E-002 to this matter.

Braun reported to NHTSA that it sold [redacted] of these defective units to Gresham Driving Aids (your company) for possible installation into new motor vehicles.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists 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 this report from your company.

Please Note: A person/company that *alters* new vehicles with the installation of these wheelchair lifts may also be required to file a Part 573 Defect Report with NHTSA. Should this equipment be installed on a vehicle that is then delivered to the first retail purchaser, a Part 573 Defect Report will be required. A template of this report can be found on our website http://www.safercar.gov/Vehicle+Manufacturers labeled "Recall and Quarterly Guide/Form." Also, a guide to safety recalls can be found on the same website labeled "Safety Recall Compendium." 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 should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective wheelchair lifts. 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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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.

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 agree with Braun that a defect exists in these wheelchair lifts, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

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 EQ12-005.

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,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

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