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

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

July 31, 2013

Ms. Femarie Rincon
A-Z Bus Sales
1900 S Riverside Avenue
Colton, CA 92324

NVS-215cg
EQ 13-005
13E-020

Subject: Safety Recalls EQ 13-005, 13E-020

Dear Ms. Rincon:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain "Flip Seats" sold exclusively to school bus manufacturers that may cause a pinch point injury to the passenger's toes and/or foot. This investigation has been assigned the identification EQ 13-005.

The purpose of this letter is to make you aware of a potential safety defect in the Flip Seat models: Flip Seat, Quasi Static "QSJ11" – 30", 36", 39"and 45"; Flip Seat, Student Safety Seat "SSSJ" – 30", 36", 39"and 45"; and, Flip Seat, School Bus Seat "SBJ" – 30", 36", 39"and 45", manufactured by The C.E. White Company (CE White). It is also to remind you of your responsibility under Federal Law.

In a letter dated April 18, 2013, CE White notified the NHTSA that it decided a defect exists in the model Flip Seats identified above and shipped to CE White customers between the dates of September 12, 2005 and January 31, 2013. When a Flip Seat is placed in a location in the bus with a seat located behind, it is possible for the occupant of the other seat to insert their toes and/or foot into the lower frame area of the Flip Seat. Should a passenger occupy the Flip Seat, the occupant of the seat located to the rear of the Flip Seat could suffer a pinch point injury to their toes and/or foot. CE White identified the total number of units affected to be 2,160. This matter was assigned recall number 13E-020. A copy of the notification is enclosed for your information.

CE White reported to NHTSA that it sold **1** of these defective seats to A-Z Bus Sales (your company) for possible installation into school buses.

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 the required report from your company.

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 Flip Seats. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;
b. 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,
c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these Flip Seats are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include 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 EQ 13-005.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@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

Via USPS Certified Mail

July 31, 2013

Mr. Joe Labonte
IC Bus Corporation, Tulsa Bus Plant
2322 N. Mingo Road
Tulsa, OK 74116

NVS-215cg
EQ 13-005
13E-020

Subject: Safety Recalls EQ 13-005, 13E-020

Dear Mr. Labonte:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain "Flip Seats" sold exclusively to school bus manufacturers that may cause a pinch point injury to the passenger's toes and/or foot. This investigation has been assigned the identification EQ 13-005.

The purpose of this letter is to make you aware of a potential safety defect in the Flip Seat models: Flip Seat, Quasi Static "QSJ11" – 30", 36", 39"and 45"; Flip Seat, Student Safety Seat "SSSJ" – 30", 36", 39"and 45"; and, Flip Seat, School Bus Seat "SBJ" – 30", 36", 39"and 45", manufactured by The C.E. White Company (CE White). It is also to remind you of your responsibility under Federal Law.

In a letter dated April 18, 2013, CE White notified the NHTSA that it decided a defect exists in the model Flip Seats identified above and shipped to CE White customers between the dates of September 12, 2005 and January 31, 2013. When a Flip Seat is placed in a location in the bus with a seat located behind, it is possible for the occupant of the other seat to insert their toes and/or foot into the lower frame area of the Flip Seat. Should a passenger occupy the Flip Seat, the occupant of the seat located to the rear of the Flip Seat could suffer a pinch point injury to their toes and/or foot. CE White identified the total number of units affected to be 2,160. This matter was assigned recall number 13E-020. A copy of the notification is enclosed for your information.

CE White reported to NHTSA that it sold **2** of these defective seats to IC Bus Corporation, Tulsa Bus Plant (your company) for possible installation into school buses.

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 the required report from your company.

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 Flip Seats. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;
b. 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,
c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these Flip Seats are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include 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 EQ 13-005.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@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

Via USPS Certified Mail

July 31, 2013

Mr. Jose Vazquez
TransTech Bus, Inc.
7 Lake Station Road
Warwick, NY 10990

NVS-215cg
EQ 13-005
13E-020

Subject: Safety Recalls EQ 13-005, 13E-020

Dear Mr. Vazquez:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain "Flip Seats" sold exclusively to school bus manufacturers that may cause a pinch point injury to the passenger's toes and/or foot. This investigation has been assigned the identification EQ 13-005.

The purpose of this letter is to make you aware of a potential safety defect in the Flip Seat models: Flip Seat, Quasi Static "QSJ11" – 30", 36", 39"and 45"; Flip Seat, Student Safety Seat "SSSJ" – 30", 36", 39"and 45"; and, Flip Seat, School Bus Seat "SBJ" – 30", 36", 39"and 45", manufactured by The C.E. White Company (CE White). It is also to remind you of your responsibility under Federal Law.

In a letter dated April 18, 2013, CE White notified the NHTSA that it decided a defect exists in the model Flip Seats identified above and shipped to CE White customers between the dates of September 12, 2005 and January 31, 2013. When a Flip Seat is placed in a location in the bus with a seat located behind, it is possible for the occupant of the other seat to insert their toes and/or foot into the lower frame area of the Flip Seat. Should a passenger occupy the Flip Seat, the occupant of the seat located to the rear of the Flip Seat could suffer a pinch point injury to their toes and/or foot. CE White identified the total number of units affected to be 2,160. This matter was assigned recall number 13E-020. A copy of the notification is enclosed for your information.

CE White reported to NHTSA that it sold **3** of these defective seats to TransTech Bus, Inc. (your company) for possible installation into school buses.

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 the required report from your company.

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 Flip Seats. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;
b. 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,
c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these Flip Seats are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include 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 EQ 13-005.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@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

Via USPS Certified Mail

July 31, 2013

Ms. Darla Sweet
Allied Bus Sales, Inc.
1101 Kenneth Street
Nixa, MO 65714

NVS-215cg
EQ 13-005
13E-020

Subject: Safety Recalls EQ 13-005, 13E-020

Dear Ms. Sweet:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain "Flip Seats" sold exclusively to school bus manufacturers that may cause a pinch point injury to the passenger's toes and/or foot. This investigation has been assigned the identification EQ 13-005.

The purpose of this letter is to make you aware of a potential safety defect in the Flip Seat models: Flip Seat, Quasi Static "QSJ11" – 30", 36", 39"and 45"; Flip Seat, Student Safety Seat "SSSJ" – 30", 36", 39"and 45"; and, Flip Seat, School Bus Seat "SBJ" – 30", 36", 39"and 45", manufactured by The C.E. White Company (CE White). It is also to remind you of your responsibility under Federal Law.

In a letter dated April 18, 2013, CE White notified the NHTSA that it decided a defect exists in the model Flip Seats identified above and shipped to CE White customers between the dates of September 12, 2005 and January 31, 2013. When a Flip Seat is placed in a location in the bus with a seat located behind, it is possible for the occupant of the other seat to insert their toes and/or foot into the lower frame area of the Flip Seat. Should a passenger occupy the Flip Seat, the occupant of the seat located to the rear of the Flip Seat could suffer a pinch point injury to their toes and/or foot. CE White identified the total number of units affected to be 2,160. This matter was assigned recall number 13E-020. A copy of the notification is enclosed for your information.

CE White reported to NHTSA that it sold **4** of these defective seats to Allied Bus Sales, Inc. (your company) for possible installation into school buses.

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 the required report from your company.

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 Flip Seats. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;
b. 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,
c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these Flip Seats are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include 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 EQ 13-005.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@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

Via USPS Certified Mail

July 31, 2013

Mr. Mario Martinez
Desert Sands, Unified School District
47-950 Dune Palms Road
La Quinta, CA 92253

NVS-215cg
EQ 13-005
13E-020

Subject: Safety Recalls EQ 13-005, 13E-020

Dear Mr. Martinez:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain "Flip Seats" sold exclusively to school bus manufacturers that may cause a pinch point injury to the passenger's toes and/or foot. This investigation has been assigned the identification EQ 13-005.

The purpose of this letter is to make you aware of a potential safety defect in the Flip Seat models: Flip Seat, Quasi Static "QSJ11" – 30", 36", 39"and 45"; Flip Seat, Student Safety Seat "SSSJ" – 30", 36", 39"and 45"; and, Flip Seat, School Bus Seat "SBJ" – 30", 36", 39"and 45", manufactured by The C.E. White Company (CE White). It is also to remind you of your responsibility under Federal Law.

In a letter dated April 18, 2013, CE White notified the NHTSA that it decided a defect exists in the model Flip Seats identified above and shipped to CE White customers between the dates of September 12, 2005 and January 31, 2013. When a Flip Seat is placed in a location in the bus with a seat located behind, it is possible for the occupant of the other seat to insert their toes and/or foot into the lower frame area of the Flip Seat. Should a passenger occupy the Flip Seat, the occupant of the seat located to the rear of the Flip Seat could suffer a pinch point injury to their toes and/or foot. CE White identified the total number of units affected to be 2,160. This matter was assigned recall number 13E-020. A copy of the notification is enclosed for your information.

CE White reported to NHTSA that it sold **5** of these defective seats to Desert Sands, Unified School District (your company) for possible installation into school buses.

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 the required report from your company.

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 Flip Seats. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;
b. 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,
c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these Flip Seats are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include 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 EQ 13-005.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@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

Via USPS Certified Mail

July 31, 2013

Mr. Travis Thompson
Harlow's Bus Sales, Inc.
PO Box 399, Highway 66
Rolette, ND 58366

NVS-215cg
EQ 13-005
13E-020

Subject: Safety Recalls EQ 13-005, 13E-020

Dear Mr. Thompson:

The National Highway Traffic Safety Administration's (NHTSA), Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain "Flip Seats" sold exclusively to school bus manufacturers that may cause a pinch point injury to the passenger's toes and/or foot. This investigation has been assigned the identification EQ 13-005.

The purpose of this letter is to make you aware of a potential safety defect in the Flip Seat models: Flip Seat, Quasi Static "QSJ11" – 30", 36", 39"and 45"; Flip Seat, Student Safety Seat "SSSJ" – 30", 36", 39"and 45"; and, Flip Seat, School Bus Seat "SBJ" – 30", 36", 39"and 45", manufactured by The C.E. White Company (CE White). It is also to remind you of your responsibility under Federal Law.

In a letter dated April 18, 2013, CE White notified the NHTSA that it decided a defect exists in the model Flip Seats identified above and shipped to CE White customers between the dates of September 12, 2005 and January 31, 2013. When a Flip Seat is placed in a location in the bus with a seat located behind, it is possible for the occupant of the other seat to insert their toes and/or foot into the lower frame area of the Flip Seat. Should a passenger occupy the Flip Seat, the occupant of the seat located to the rear of the Flip Seat could suffer a pinch point injury to their toes and/or foot. CE White identified the total number of units affected to be 2,160. This matter was assigned recall number 13E-020. A copy of the notification is enclosed for your information.

CE White reported to NHTSA that it sold **6** of these defective seats to Harlow's Bus Sales, Inc. (your company) for possible installation into school buses.

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 the required report from your company.

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 Flip Seats. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the Defect Information Report and the draft owner notification letter, please also provide a proposed schedule for conducting the required owner and dealer notifications that includes the following information:

a. the approximate date on which the owner notification will begin;
b. 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,
c. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree that vehicles it manufactured with these Flip Seats are defective, and therefore will not conduct a safety recall of the vehicles, you must submit a written response explaining that decision and include 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 EQ 13-005.

If you have any questions concerning this matter, please contact Cynthia Glass of my staff at (202) 366-2920 or by e-mail at cynthia.glass@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
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