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

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

January 15, 2014

National Highway Traffic and Safety Administration
Office of Recall Management
1200 New Jersey Avenue, SE
Washington, DC 20590
Attn: Cynthia Glass

Subject: 13E-001: Clean-point - Mis-handled Engineering Change

Dear Ms. Glass,

First, I am sorry for the delay in getting back to you with the clean point information related to the subject recall. Though several variants were addressed in December of 2012, some were missed such that a population of units was shipped with the incorrect pendant. The mistake is attributable to confusion created by the release of a new model combined with personnel turnover related to the relocation of Ricon's S&K Series production facility. Of the 7,485 S&K Series units produced in 2013, 356 units or 4.76% were produced with the old pendant design resulting in an increase in the affected population of 8.8% (from 4,049 to 4,405).

With the new model described above, the addition of the pendant occurs at the end of the assembly process making it very easy to inspect. With the older, Legacy design, the pendant is packaged separately and added to the package containing the finished lift thereby complicating verification through visual inspection. The "clean point" for the newer model lift is November 26, 2012. For the legacy model, the "clean point" point is January 4th, 2014.

Additionally, since the original event of July 14, 2012 that was the basis for the decision to undertake the subject recall, Ricon have received no reports of any additional incidents. Moreover, as the user population is generally aware of the subject recall, and as Ricon's installation instructions have been improved to reflect the corresponding hazard and the need to protect the end of the power cable, the probability of existence of the conditions that precipitated the original event based solely on the presence of the unprotected pendant cord is significantly reduced.

As a corrective action, Ricon proposed to notify the eleven (11) OEM's to whom the aforementioned 356 units were shipped. Further, as was previously done, Ricon proposes to work with the eleven (11) OEM's to notify their customers to ensure mitigation of as many units as possible in a timely fashion.

Please contact me with any questions. On behalf of Ricon, I am sorry for any inconvenience caused by this oversight.

Kind Regards,



Stanton D. Saucier, PE
Vice President – Marketing and Product Planning
Ricon Corporation
A Wabtec Company