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

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail and E-mail

March 14, 2014

Ms. Janice Rivera, General Manager
Ricon Corporation
7900 Nelson Road
Panorama City, CA 91402

NVS-215cg
EQ13-003
13E-001
12E-038

Subject: Safety Recalls EQ13-003, 12E-038 and 13E-001

Dear Mr. Saucier:

On September 28, 2012, Ricon Corporation (Ricon) notified the NHTSA that a defect exists in certain model S-Series and K-Series wheelchair lifts manufactured after August 1, 2006, and equipped with an optional armored pendant cable. This matter was assigned recall number 12E-038. On January 11, 2013, Ricon notified the NHTSA that the potential number of units affected in recall 12E-038 increased. This matter was assigned recall number 13E-001. On June 13, 2013, the Recall Management Division (RMD) opened an Equipment Query (EQ) Investigation in order to ensure those vehicle manufacturers that incorporated the defective lifts onto their vehicle applications were aware of the Ricon defect decisions and recalls, and were conducting safety recalls of affected vehicles or provided explanations if they were not. The investigation was assigned the identification number EQ13-003.

In November, 2013, as the EQ investigation was approaching closures we discovered Ricon had not affirmatively indicated when they ceased production of the defective lifts. Cynthia Glass, of our office, left numerous phone messages and sent emails to Ricon from November 2013 through January 2014, requesting the end of production ("clean point") date.

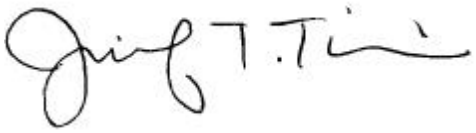
On January 15, 2014, Ricon emailed a letter stating that its production facility mishandled an engineering change and 11 manufacturers would be notified that defective units may have been shipped to them. The apparent deduction to be made is that Ricon had not taken those measures necessary to correct against the defect in production, and continued to make, sell and distribute defective lifts. Also, that Ricon would now be conducting a third safety recall to rectify its continued sale of the defective equipment.

After receiving this information, Ms. Glass left more phone messages and sent emails to you requesting another 573 Report that would confirm this information, and that Ricon was committed to conducting a safety recall to identify and remedy the additional defective lifts. As of this date, we have not received the required report from your company. RMD is aware that Ricon has filed an average of 2 recalls a year with us since 2006; therefore, we are confident that Ricon is familiar with the recall process and how to file a recall report.

You are hereby instructed to file a written explanation as to why Ricon has not made a defect decision. You are instructed to file the required notification to NHTSA about Ricon's decision and inform NHTSA of Ricon's plans to conduct a safety recall.

Your company's written response must be submitted to this office within 5 calendar days of receiving this letter. Submit the response directly to Ms. Glass at cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ13-003. 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.

Sincerely,



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