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

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail

December 3, 2014

Farber Specialty Vehicles Custom Coach
Attn: Mr. Duane England
7052 Americana Parkway
Reynoldsburg, OH 43068-4117

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Mr. Duane England:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **131** of these wheelchair lifts to Farber Specialty Vehicles Custom Coach (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

IMPORTANT UPDATE:

All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Glaval Bus Inc.
Attn: Mr. Matt Pollard
914 County Road #1
Elkhart, IN 46515

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Mr. Matt Pollard:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **908** of these wheelchair lifts to Glaval Bus Inc. (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

IMPORTANT UPDATE:

All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

OBS, Inc.
Attn: Mr. Bob Ferne
1324 Tuscarawas St West
Canton, OH 44706

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Mr. Bob Ferne:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **8** of these wheelchair lifts to OBS, Inc. (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

IMPORTANT UPDATE:

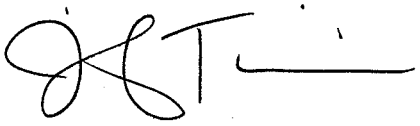
All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Oshkosh Specialty Vehicles
Attn: Mr. Larry Brewer
16745 South Lathrop Avenue
Harvey, IL 60426

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Mr. Larry Brewer:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **9** of these wheelchair lifts to Oshkosh Specialty Vehicles (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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

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IMPORTANT UPDATE:

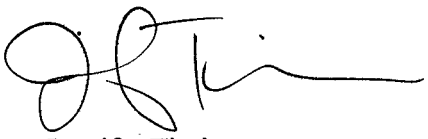
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Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Quality Van Sales, Inc.
Attn: Mr. Brian Duffy
349 Old Colony Road, Route 123
Norton, MA 02766-2016

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Mr. Brian Duffy:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **22** of these wheelchair lifts to Quality Van Sales, Inc. (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

IMPORTANT UPDATE:

All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Safety Vans LLC
Attn: Materials Manager
14133 Pennsylvania
Hagerstown, MD 21742

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Materials Manager:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **3** of these wheelchair lifts to Safety Vans LLC (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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

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IMPORTANT UPDATE:

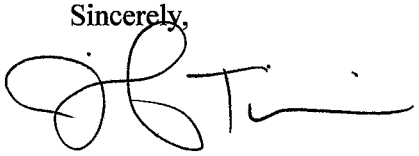
All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Sunset Vans, Inc.
Attn: Mr. Dan Hemphill
8851 Lakewood Boulevard
Downey, CA 90240-2301

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Mr. Dan Hemphill:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **67** of these wheelchair lifts to Sunset Vans, Inc. (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

IMPORTANT UPDATE:

All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331, Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Mobility Specialist, Inc.
Attn: Mr. Vincent Fabozzi
490 Capricorn Street
Brea, CA 92821

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Mr. Vincent Fabozzi:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **288** of these wheelchair lifts to Mobility Specialist, Inc. (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

IMPORTANT UPDATE:

All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331, Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Thomas Built Buses, Inc.
Attn: Mr. Matthew Bibo
4747 North Channel Avenue
Portland, OR 97217

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Mr. Matthew Bibo:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **4509** of these wheelchair lifts to Thomas Built Buses, Inc. (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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,
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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 wheelchair lifts 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.

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information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

IMPORTANT UPDATE:

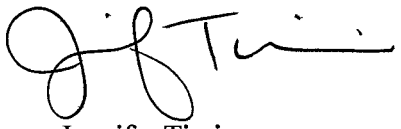
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Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

U. S. Bus Corporation c/o Transportation Collaborative, Inc.
Attn: Mr. Timothy Downey
7 Lake Station Road
Warwick, NY 10990

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Mr. Timothy Downey:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **99** of these wheelchair lifts to U. S. Bus Corporation c/o Transportation Collaborative, Inc. (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

IMPORTANT UPDATE:

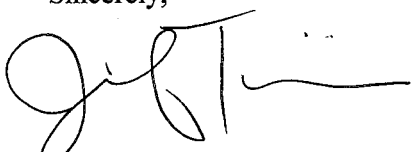
All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Creative Carriage Ltd
Attn: Materials Manager
P.O. Box 600
St. George, Ontario N0E 1N0

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Materials Manager:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **202** of these wheelchair lifts to Creative Carriage Ltd (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

IMPORTANT UPDATE:

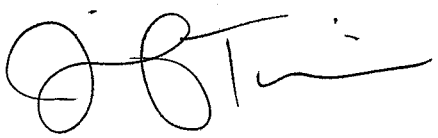
All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Girardin Minibus, Inc. /A. Girardin Inc.
Attn: Ms. Valerie Fortin
3000 Rue Girardin
Drummondville, Quebec J2E 0A1

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Ms. Valerie Fortin:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **322** of these wheelchair lifts to Girardin Minibus, Inc. /A. Girardin Inc. (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

IMPORTANT UPDATE:

All manufacturer recall notifications and associated documents such as draft owner letters, quarterly reports, and copies of dealer communications, must be submitted through the agency's secure Recalls Management Portal (recalls portal). Hard copy and emailed documents are no longer accepted. To access the portal and register as a manufacturer, go to http://www.safercar.gov/Vehicle+Manufacturers and use the appropriate link on the left side of the page. Questions concerning how to register for an account and other issues associated with use of the portal may be directed to the Recalls Portal Helpdesk toll free at 1-888-719-9220.

Should your company decide not to make a defect decision, and will be responding with an explanation as to why it is not making a defect decision, DO NOT submit that response through the recalls portal. Rather, that response must be sent directly to Cynthia Glass of my staff at The National Highway Traffic Safety Administration, The Recall Management Division: NVS-215, 1200 New Jersey Avenue, S.E., Room W48-331,Washington, D.C. 20590, or via an emailed response letter to Cynthia.glass@dot.gov. In your response, please be certain to include a reference to this matter's identification number which is EQ 14-013.

Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

December 3, 2014

Malley Industries Inc.
Attn: Materials Manager
1100 Aviation Ave
Dieppe, NB E1A 9A3

NVS-215cg
EQ 14-013
14E-041

Subject: Safety Recall 14E-041

Dear Materials Manager:

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 wheelchair lifts. This investigation has been assigned the identification number EQ 14-013.

In a letter dated July 14, 2014 and amended on July 31, 2014, Ricon Corporation (Ricon) notified the NHTSA that it decided a defect exists in certain model S2005, S2010, S5005, S5010, S5505, and S5510 wheelchair lifts manufactured after January 1, 2006. According to Ricon, the platform-side plate of the affected wheelchair lifts may crack. If the platform-side plates crack, the lift platform can separate from the lift and come to rest against the vehicle's lift door. When the doors are opened, the platform may fall out, increasing the risk of injury to the lift operator. This matter was assigned recall number 14E-041. A copy of the notification is enclosed for your information.

Ricon reported to NHTSA that it sold **26** of these wheelchair lifts to Malley Industries Inc. (your company) for possible installation into vehicles. The purpose of this letter is to make you aware of a potential safety defect in vehicles your company may have manufactured, and to remind you of your responsibility under 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, you must notify NHTSA of that decision and file a defect information report. We are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with these 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 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 wheelchair lifts 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.

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Whether your company is filing a recall notice and information report, or filing an explanation, that information is due **within 10 days of receiving this letter.**

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

Sincerely,



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

Enclosure