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August 4, 2004

VIA FAX 202-366-7882, 8 pages total
ATTENTION MR. CHARGE PERSON

VIA FEDEX to Mr. Weinstein:
Mr. Kenneth N. Weinstein
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street SW
Washington, DC 20590

Subject: Notification Pursuant to 49 CFR Part 573 of Defective Retractors

Dear Mr. Weinstein:

The following information is submitted in accordance with the National Highway Traffic Safety Administration's reporting regulations, 49 CFR Section 573.6. Sure-Lok, Inc. has determined that some of its wheelchair securement retractor assemblies have sprocket teeth in the retractor assembly (part number 8625-13) that are out of alignment. These retractor assemblies are part of a system used to secure wheelchairs in vehicles.

Approximately 300,000 retractor assemblies have been sold. We believe that less than one percent of the retractor assemblies have the defect in question.

In those cases where there is a problem, the sprocket teeth of the retractor assembly are out of line causing the load pawl not to fully seat in the sprocket teeth. Each retractor assembly has a load pawl that engages in two sprockets (one on each side). As the retractor strap is wound into the case, the load pawl ratchets or clicks into the teeth of the sprocket. On units that have the proper alignment (phasing) of the sprockets, the load pawl clicks into and seats on both sprockets simultaneously. On those few out of line sprockets, the load pawl does not seat in both sprockets simultaneously causing the sprocket teeth not to hold as they are designed to. This can result in the securement system not supporting the wheelchair in a crash.

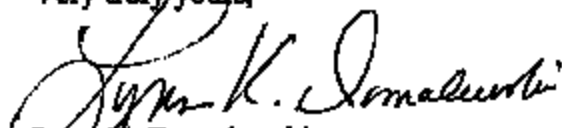
The matter was brought to Sure-Lok, Inc.'s attention by the State of Florida who observed a defective sprocket. On July 29, 2004, the State of Florida examined 350 sprockets and identified three that were defective. Our examination of the issue has resulted in this letter. The attached correspondence sets forth Sure-Lok, Inc.'s program for remedying the defect. The program requires each retractor assembly to be inspected. The inspection is a simple process that may be done on site, and in those cases, where a defective sprocket is identified, the product will be returned to us and a replacement will be provided at no cost to the customer. In the unlikely event that a customer has already paid to replace the defective part, Sure-Lok, Inc. will reimburse the customer for their costs.

Sure-Lok, Inc. is interested in mailing out the attached customer letter as soon as possible. The notification will be completed within two weeks from the date it starts. Please notify us as soon as possible that the customer letter has been approved and provide us with the recall number.

Also attached is the required list of OEM's that may have received the subject retractor.

If you have any questions, please contact me at 908-231-1800 X128. My direct fax number is 908-218-1143.

Very truly yours,



Lynn K. Domalewski
Vice President of Human Resources

Enclosures:

- OEM list
- Envelope sample
- Customer letter
- Safety Bulletin

Sure-Lok, Inc.
List of OEM dealers

Customer Name	Customer Address 1	Customer Address 2	City	State	Zip Code
			Lima	OH	
			Fort Smith	AR	
			Battle Creek	MI	
			Wbrom	MI	
			Jefferson	NC	
			Brea	CA	
			San Bernadino	CA	
			Akron	OH	
			Attleboro	MA	
			Billerica	MA	
			Wichita	KS	
			Oriskany	NY	
			Brown City	MI	
			Norton	MA	
			Londonderry	NH	
			Downey	CA	
			Memphis	TN	
			Elkhart	IN	
			Atlantic Beach	FL	
			Suffern	NY	
			Brookheadville	PA	
			China	CA	
			Winamac	IN	
			Inlay City	MI	
			Penn Yan	NY	
			Bluffton	OH	
			Oswego	KS	
			Riverside	CA	
			Salina	KS	
			Elkhart	IN	
			Elkhart	IN	
			Hayward	CA	
			Farmington	NM	
			Goshen	IN	
			Burlington	OH	
			Goshen	IN	
			Elkhart	IN	
			Ft. Valley	GA	
			Ft. Valley	GA	