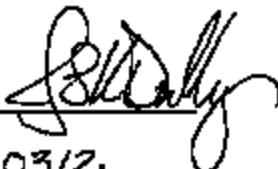


Form Approved: O.M.B. No. 2127-0004

RECEIVED  
VS-215

Safety Defect and Noncompliance Report Guide for Vehicles  
**PART 573 Defect and Noncompliance Report<sup>1</sup>**

On 03-12, 2004, TURTLE TOP [MFR] decided that a defect which relates to motor vehicle safety (~~a noncompliance with Federal Motor Vehicle Safety Standard No. \_\_\_\_\_~~) exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared 03-16-2004 REVISED 3-24-04 

Furnish the manufacturer's identification code for this recall (if applicable): RCN-040312

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

TURTLE TOP

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

JANET L. KERCHER-DUDLEY

STANDARDS ENGINEER

Telephone Number: (800) 296-2105 Fax No.: (674) 831-3407

Name and Title of Person who prepared this report.

JANET L. KERCHER-DUDLEY

STANDARDS ENGINEER

Signed: 

<sup>1</sup>Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5227 or by FAX at (202) 366-7882.

**I. Identify the Vehicle Models Involved in the Recall**

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): TURTLE Model Years Involved: 2002, 2003, 2004 Model(s): VAN TERRA

Production Dates: Beginning: 5-1-02 Ending: 3-12-04

VIN Range: Beginning: VARIOUS \* Ending: \_\_\_\_\_

Vehicle Type: BUS Bodystyle: BUS

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

RECALLED VEHICLES HAVE DOOR MOTOR ASSEMBLY AD-100 INSTALLED. LARGER BUS UNITS (NOT INCLUDED IN RECALL) HAVE DOOR MOTOR ASS'Y AD-200 INSTALLED WHICH HAVE A DIFFERENT HANDLE DESIGN.

Make(s): TURTLE TOP Model Years Involved: 2004 Model(s): TERRA TRANSPORT

Production Dates: Beginning: 9-8-03 Ending: 3-2-04

VIN Range: Beginning: VARIOUS \* Ending: \_\_\_\_\_

Vehicle Type: BUS Bodystyle: BUS

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

SAME REASON AS ABOVE

\* ADDITIONAL NOTE: BUS CHASSIS VIN # DOES NOT DETERMINE MODEL YEAR

Make(s): \_\_\_\_\_ Model Years Involved: \_\_\_\_\_ Model(s): \_\_\_\_\_

Production Dates: Beginning: \_\_\_\_\_ Ending: \_\_\_\_\_

VIN Range: Beginning: \_\_\_\_\_ Ending: \_\_\_\_\_

Vehicle Type: \_\_\_\_\_ Bodystyle: \_\_\_\_\_

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

\_\_\_\_\_

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

## II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Model	Year (Model Year)	Number of Vehicles Potentially Involved
VAN TERRA	2002	27
VAN TERRA	2003	250
VAN TERRA	2004	159
TERRA TRANSPORT	2004	32

Total Number Potentially Affected by the Recall:

468

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100%

Identify and describe how the recall population was determined—in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

RECALL population's first vehicle began with first unit which had AD-100 door motor assembly installed (information derived from documentation on Engineering Change Notice). All units previous to this vehicle had different design and brand of door motor assembly. RECALL population's ending vehicle begins with last unit produced & shipped with AD-100 door motor assembly installed prior to determining RECALL needed to be implemented. IN-PROCESS units corrected in-house prior to further shipment of vehicles. RECALL vehicles selected based on which units had the AD-100 door motor assembly installed during the manufacture of the vehicle.

### III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

THE ELECTRIC DOOR MOTOR ASSEMBLY HANDLE (LEVER) COULD POSSIBLY BREAK WHEN PULLING ON THE HANDLE FOR EMERGENCY RELEASE TO OPEN THE SIDE ENTRY/EXIT DOOR. THE HANDLE IS LOCATED ON THE INSIDE OF THE VEHICLE ON THE FRONT BULKHEAD WALL (UPPER PASSENGER SIDE) ADJACENT TO THE SIDE ENTRY/EXIT DOOR. CENTER OF HANDLE ASSEMBLY IS 59" UP FROM VEHICLE FLOOR. ATTACHED IS PICTURE OF DOOR MOTOR ASSEMBLY EMERGENCY RELEASE LEVER AS INSTALLED IN FINISHED VEHICLE.

Describe the cause(s) of the defect or noncompliance condition.

HANDLE BREAKAGE COULD POTENTIALLY OCCUR ON EXTENSION ARM WHERE HANDLE BODY ATTACHES TO DOOR MOTOR ASSEMBLY. EXTENSION ARM COMPONENT MATERIAL COMPOSITION OUT OF SPECIFICATION.

Describe the consequence(s) of the defect or noncompliance condition.

EGRESS THROUGH SIDE ENTRY/EXIT DOOR DIFFICULT IF HANDLE BREAKS. HANDLE DISENGAGES DOOR MOTOR ASSEMBLY SO THAT DOOR CAN BE OPENED WITHOUT VEHICLE POWER OR BATTERY POWER.

Identify any warning which can (a) precede or (b) occur.

NO INITIAL WARNING

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

CUTTING EDGE MACHINE & TOOL, INC.  
19159 CR 146 P.O. BOX 146  
NEW PARIS, IN 46553

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

DAVE BERKEY, CEO

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

~~7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.~~

BREAKAGE OF DOOR MOTOR HANDLES IN-HOUSE DURING PRODUCTION  
WEEK ENDING 2/22/04 AND 3/6/04. EXACT DATES NOT AVAILABLE.

(1) HANDLE BROKE IN WELD SHOP, (2) IN FINAL FINISH. (1) HANDLE BROKE  
IN FIELD ON 2-24-04 BY COMPANY REPRESENTATIVE AT SERVICE  
TECHNICIAN'S WORKSHOP. VENDOR BEGAN RESEARCHING CHANGE TO  
MATERIAL COMPOSITION BACK IN TIME AND WAS UNABLE TO DETERMINE  
WHEN MATERIAL BEGAN BEING OUT OF SPECIFICATION, HENCE DECISION  
TO RECALL ALL HANDLES IN FIELD.

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

MANUFACTURER'S REMEDY IS TO REMOVE DOOR HANDLE FROM  
DOOR MOTOR ASSEMBLY AND REPLACE WITH NEW HANDLE  
WHICH ENCOMPASSES DIFFERENT DESIGN.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

RECALL HANDLE EXTENSION ARM IS MADE OF ALUMINUM. REMEDY  
HANDLE EXTENSION ARM IS MADE OF STAINLESS STEEL. ACTION TO RELEASE  
THE DOOR MOTOR ASSEMBLY FOR RECALL HANDLE IS TO PULL WITH DOWNWARD  
ANGULAR FORCE ON HANDLE. REMEDY HANDLE ACTION IS TO TURN THE  
HANDLE. TAKES MORE FORCE TO PULL ON HANDLE THAN TO TURN NEW  
HANDLE. ATTACHED IS PICTURE OF DOOR MOTOR ASSEMBLY EMERGENCY  
RELEASE HANDLE REMEDY.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

IN-PROCESS PRODUCTION REMEDY IS TO CHANGE ALL DOOR  
MOTOR ASSEMBLY HANDLES TO DIFFERENT DESIGN HANDLES. VENDOR  
SUPPLIED NEW HANDLES AND PERSONNEL TO CHANGE HANDLES  
IN-HOUSE PRIOR TO ANOTHER COMPLETED UNIT SHIPPED. RECALL  
REMEDY IN FIELD SAME AS PRODUCTION REMEDY.

#### VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

- WRITE & PROOF RECALL CAMPAIGN LETTER TO AFFECTED DEALERS  
AND CUSTOMER END-USER NOTIFICATION LETTER = 3-26-04
- SEND COPIES TO NHTSA FOR APPROVAL = 3-29-04
- SEND LETTERS TO DEALERS = 3-31-04
- FINALIZE END USER MAILING LIST = 4-2-04
- MAIL OUT END-USER NOTIFICATION LETTERS = 4-8-04
- SEND OUT REPAIR KITS TO DEALERS = 4-8-04

Mailing dates dependent on RECEIVING A NHTSA NOTIFICATION CAMPAIGN NUMBER. (NEED NUMBER FROM NHTSA TO INCLUDE ON NOTIFICATION LETTERS, VII. Furnish Recall Communications MAILINGS, & TSDS).

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

COMMUNICATIONS TO BE SUBMITTED TO NHTSA ONCE FINALIZED.

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.



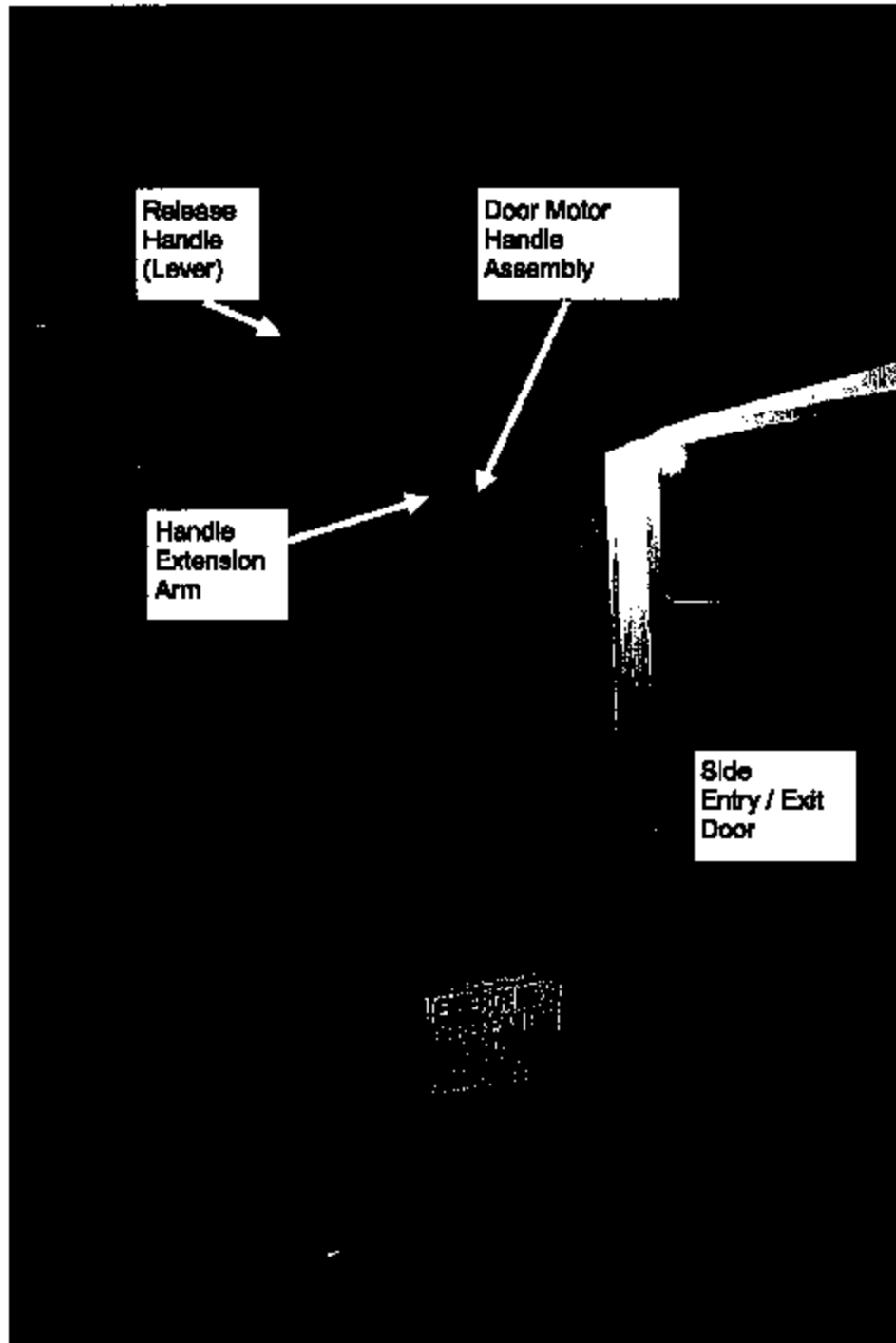
A Division of Independent Protection Co., Inc.

67819 State Road 15 New Paris, Indiana 46553

Phone 574 831-4340 • Fax 574 831-4349

E-mail [ttsp@turtletop.com](mailto:ttsp@turtletop.com) or [tibus@terra-transit.com](mailto:tibus@terra-transit.com)

[www.turtletop.com](http://www.turtletop.com) or [www.terra-transit.com](http://www.terra-transit.com)



**AD-100 Door Motor Assembly**

RCN-040312  
Recall Emergency Re-  
lease Handle  
REV 0 / 3-24-04



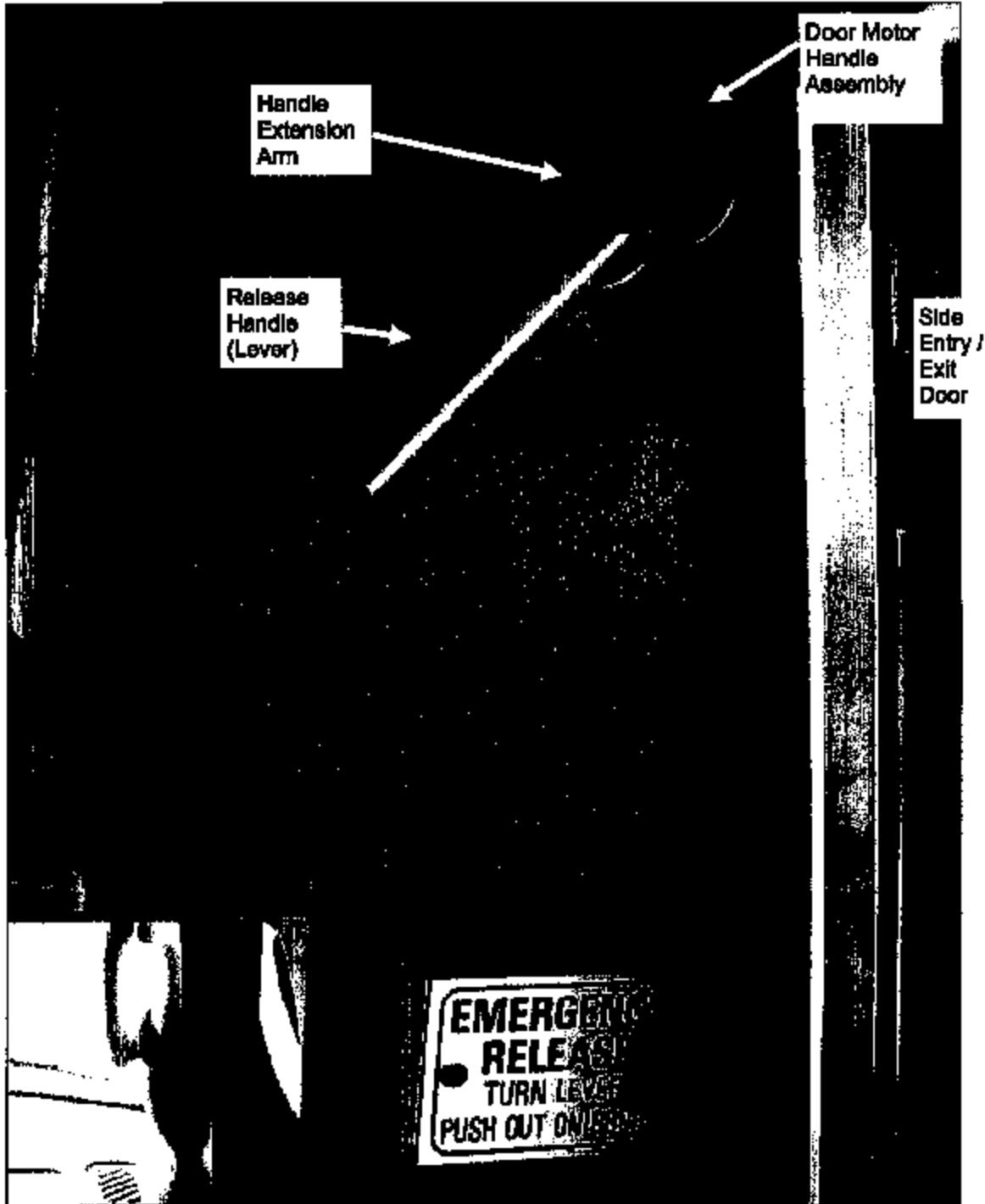
A Division of Independent Protection Co., Inc.

67819 State Road 15 New Paris, Indiana 46553

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[www.turtletop.com](http://www.turtletop.com) or [www.terra-transit.com](http://www.terra-transit.com)



**AD-100 Door Motor Assembly**

RCN-040312  
Emergency Release  
Handle Remydy  
REV 0 / 3-24-04