

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

04V-433



On August 16, 2004, Sure-Lok, Inc. [MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. 209) 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 Responsibility and Reports.

Date this report was prepared: August 31, 2004

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

NHTSA Campaign ID Number: 04E058000

Girardin Minibus Inc. # 04-007-SL (for reference only)

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.

Girardin Minibus Inc., 4675 St. Roch North (Trans-Canada Hwy), Drummondville,

Quebec, J2B 6V4

Belt supplier: Kinedyne Canada Ltd, 120 Commander Blvd, Agincourt, Ontario M1S 3H7, (Sure-Lok's exclusive Canadian distributor).

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

Luc Guillemette, After sales & Service manager (Girardin Minibus Inc.)

Telephone Number: (819) 477-8222

Fax No.: (819) 477-1848

Name and Title of Person who prepared this report.

Luc Guillemette

After sales & service manager

Signed:

¹ 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 Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210 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): Girardin **Model Years Involved:** 1999-2000-2001-2002-2003 **Model(s):**
MBII & MBIV Commercial and School bus **Production Dates: Beginning:** June 1999
Ending: December 2003
VIN Range: Beginning: ----- **Ending:** -----
Vehicle Type: Ford E-350 & E-450, GM 3500
Body style: Commercial & School bus

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

Recalled vehicles are equipped with Sure-Lok wheelchair tie-down securement assemblies.

Make(s): _____ **Model Years Involved:** _____ **Model(s):** _____
Production Dates: Beginning: _____ **Ending:** _____
VIN Range: Beginning: _____ **Ending:** _____
Vehicle Type: _____ **Body style:** _____

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

Make(s): _____ **Model Years Involved:** _____ **Model(s):** _____
Production Dates: Beginning: _____ **Ending:** _____
VIN Range: Beginning: _____ **Ending:** _____
Vehicle Type: _____ **Body style:** _____

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.

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
<u>MB-IV Commercial bus body</u>	<u>1999</u>	<u>1</u>
<u>MB-IV Commercial bus body</u>	<u>2000</u>	<u>1</u>
<u>MB-IV Commercial bus body</u>	<u>2001</u>	<u>5</u>
<u>MB-II School bus body</u>	<u>2002</u>	<u>1</u>
<u>MB-IV School bus body</u>	<u>2002</u>	<u>1</u>
<u>MB-IV Commercial bus body</u>	<u>2002</u>	<u>6</u>
<u>MB-IV School bus body</u>	<u>2003</u>	<u>8</u>
<u>MB-IV Commercial bus body</u>	<u>2003</u>	<u>12</u>

Total Number Potentially Affected by the Recall: 35

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: maximum 35 vehicles, we cannot estimate percentage.

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:

We have listed all the vehicles manufactured & equipped with Sure-Lok retractable wheelchair tie-down assemblies through July 2004.

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 sprocket teeth of the retractor assembly on certain Sure-Lok wheelchair tie-down securement assemblies may be out of alignment causing the load pawl not to fully seat in the sprocket teeth.

Describe the cause(s) of the defect or noncompliance condition.
See Sure-Lok's safety bulletin for more details.

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

In the event of a vehicle crash, the wheelchair may not be adequately secured possibly resulting in injuries.

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

Check with Sure-Lok.

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

Kinedyne Canada Limited (Sure-Lok's exclusive Canadian Distributor)

120 Commander Boulevard

Agincourt, Ontario

MIS 3H7

Phone: 416-291-7168 Fax: 416-291-0814

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

Dana Yarnell, Quality Assurance Manager at Kinedyne

Phone: 416-291-7168 Fax: 416-291-0814

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.

August 16, 2004: we received a letter from Mrs. Dana Yarnell, Quality Assurance Manager at Kinedyne Canada Ltd. saying there is a recall on certain Sure-Lok wheelchair tie-down securement assemblies.

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.

Check with Sure-Lok.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

Kinedyne Canada Ltd. will conduct the recall. On August 27, 2004 we gave Mr. Bill Franko a list of the vehicles equipped with Sure-Lok retractable wheelchair tie-down assemblies through July 2004. He will notify the owners and replace the defective parts free of charge if necessary.

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

Replace the defective part.

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

Check with Sure-Lok.

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.

We received a letter from Kinedyne Canada Ltd. (Sure-Lok's exclusive Canadian Distributor) on August 16, 2004. The same day, we inspected all Sure-Lok retractors in inventory as per the instructions supplied on the Safety bulletin. None of them met the defined criteria. On August 27, 2004 we supplied to Kinedyne Canada Ltd. (Mr. Bill Franko) the list of dealers (name, address & phone number) of the vehicles not sold yet and the list of final customers (name, address & phone number) of the other minibuses. You will find enclosed a list of the potentially affected vehicles.

VI. Identify the Recall Schedule

10. 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.

Kinedyne Canada Ltd. will conduct the recall. Check with them.

VII. Furnish Recall Communications

11. 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.*

See the enclosed documents:

- List of the potentially affected vehicles
- Fax from Sure Lok (letter & Safety Bulletin)

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

Sure-Lok Recall # 04E058

Possibly involved minibuses manufactured by Girardin Minibus

Sure-Lok Retractable wheelchair tie-down

Jersey Bus Sales 2015 Route 208 Bordentown, NJ 08505 Phone: 855-288-2887	0224727	MB4 Comm	1FDXE45F32HA20585
	0224729	MB4 Comm	1FDXE45F72HA20587
	0224730	MB4 Comm	1FDXE45F82HA20588
	0224732	MB4 Comm	1FDXE45F82HA60296
	0224733	MB4 Comm	1FDXE45F02HA60297
	0224734	MB4 Comm	1FDXE45F22HA60298
	0321306	MB4 Comm	1FDXE45F83HB93438
	0321307	MB4 Comm	1FDXE45FX3HB93439
	0321308	MB4 Comm	1FDXE45F83HB93440
	0321309	MB4 Comm	1FDXE45F83HB93441
	0321310	MB4 Comm	1FDXE45FX3HB93442
	0324783	MB4 Comm	1FDXE45F83HB94749
	0124774	MB4 Comm	1FDXE45F81HA18286
	0124775	MB4 Comm	1FDXE45FX1HA18287
0321311	MB4 Comm	1FDXE45F13HB93443	
Ramp Transportation 1696 Route 112 Port Jefferson Station, NY 11776 Phone: 631-473-5007	0124718	MB4 Comm	1FDXE46F31HA16230
Blue Bird Bus Sales of Pittsburgh 1388 Pittsburgh Road Valencia, PA 16059 Phone: 724-888-7222	0324881	MB4 Comm	1FDXE45F53HA17513
	0324882	MB4 Comm	1FDXE46F73HA17514
	0324884	MB4 Comm	1FDXE46F03HA17516
	0324885	MB4 Comm	1FDXE45F23HA17517
	0324883	MB4 Comm	1FDXE46F93HA17515
	0034727	MB4 Comm	1FDXE46F3YHA75188
	0124528	MB4 Comm	1FDXE45F01HA16928
	0124737	MB4 Comm	1FDXE45F21HA16249
A.Z. Bus Sales Inc. 1800 South Riverside Ave Colton, CA 92324 Phone: 809-781-7188	0223339	MB2 School	1FD8E35F92HB74075
Auto Safety House 2830 W. Buckeyes Road Phoenix, AZ 85009 Phone: 602-288-9721	0328259	MB4 School	1GBJG31UX31118935
	0328260	MB4 School	1GBJG31U631120732
	0328294	MB4 School	1GBJG31U531115248
	0328295	MB4 School	1GBJG31U531115831
	0328296	MB4 School	1GBJG31U131115874
	0328297	MB4 School	1GBJG31U731117708

Sure-Lok Recall # 04E058

Possibly involved minibuses manufactured by Girardin Minibus

Sure-Lok Retractable wheelchair tie-down

Carpenter Bus Sales Inc. 328 Southgate Court Brentwood, TN 37027 Phone: 615-376-2287	0224558	MB4 School	1FDXE45SX2HA80319
	9924752	MB4 Comm	1FDXE47F6XHA07360
Durham School Services 9011 Mountain Ridge Drive Austin, TX 78759 Phone: 512-843-6292	0324315	MB4 School	1FDWE45F83HB90342
	0324318	MB4 School	1FDXE45F03HB85385

Vehicles potentially involved: 35

USA	MB4 Comm	1999	1
	MB4 Comm	2000	1
	MB4 Comm	2001	5
	MB2 School	2002	1
	MB4 School	2002	1
	MB4 Comm	2002	8
	MB4 School	2003	8
	MB4 Comm	2003	12
		Total	35

SURE-LOK™

WHEELCHAIR TIE-DOWNS & OCCUPANT RESTRAINT SYSTEMS by  **KINEDYNE**

August 16, 2004

Dear Valued Customer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Sure-Lok, Inc. has decided that a defect which relates to motor vehicle safety exists in its Wheelchair Securement Retractor Assemblies. While this defect only occurs in a small number of the retractor assemblies, it needs to be addressed.

The description of the defect is set forth in the attached Safety Bulletin. As long as this malfunction exists, the wheelchair may not be secured during a crash. Following the instructions set forth in the attached Safety Bulletin will ensure that the problem does not occur regarding your Sure-Lok wheelchair securement systems.

If the system is not checked as the Safety Bulletin instructs, then in a crash the wheelchair could possibly not be secured resulting in injury to the wheelchair passenger.

If you identify a defective retractor assembly, it should be returned to us as instructed. Sure-Lok, Inc. will replace the defective part at no cost. (In the event you have already paid for a replacement of the defective part, Sure-Lok will reimburse you.)

If the above-mentioned recall and remedy are not completed to your satisfaction, you may contact the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street SW, Washington, DC 20590 or call the toll free Auto Safety Hotline at 888-327-4236 and reference NHTSA Recall #04E058.

We appreciate your business and truly regret any inconvenience that this recall may cause you. Should you require more specific information, contact Sure-Lok Customer Service at 866-787-3565.

Sincerely,

Dana Yarnell, CQM, CQE, CQA
Quality Assurance Manager

Attachment: Safety Bulletin 08/04 (3 pages) re NHTSA Recall #04E058

Kinedyne Canada Limited
120 Commander Boulevard
Toronto, Ontario M1S 3H7

416-291-7188 TOLL FREE: 866-291-7188 FAX: 416-291-0214

SURE-LOK

Safe and Secure

SAFETY BULLETIN

NHTSA RECALL #04E058

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August 16, 2004

There is a possibility of a component related defect in Sure-Lok retractable wheelchair tie-down assemblies. It has been identified in only a few retractor assemblies; however, the potential for serious injury is sufficient to warrant this alert. This safety bulletin affects all retractable wheelchair tie-down assemblies shipped through July 2004.

The component defect places the sprocket teeth of the retractor assembly out of alignment, causing the load pawl to not fully seat in the sprocket tooth. **ALL retractable wheelchair tie-down assemblies must be inspected for this potential condition.** See instructions below. Any retractor, which meets the defined criteria, needs to be removed from service immediately and returned to Sure-Lok for replacement at no charge. Contact Customer Service at 866-787-3565 for further instructions.

Instructions for Inspecting Retractors

Retractor Operation:

Each retractor assembly has a load pawl that engages into 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 sprockets. On units that have the proper alignment (phasing) of the sprockets, the load pawl clicks into and seats in both sprockets simultaneously. On these units, there are 24 teeth encountered on one full rotation of the retractor knob.

On units that exhibit the identified alignment or phase problem, the load pawl does not seat in both sprockets simultaneously, but encounters the sprocket teeth on one sprocket and then the other in succession. One full rotation of the retractor knob will click through 48 teeth (24 teeth for each sprocket) on these units.

SURE-LOK

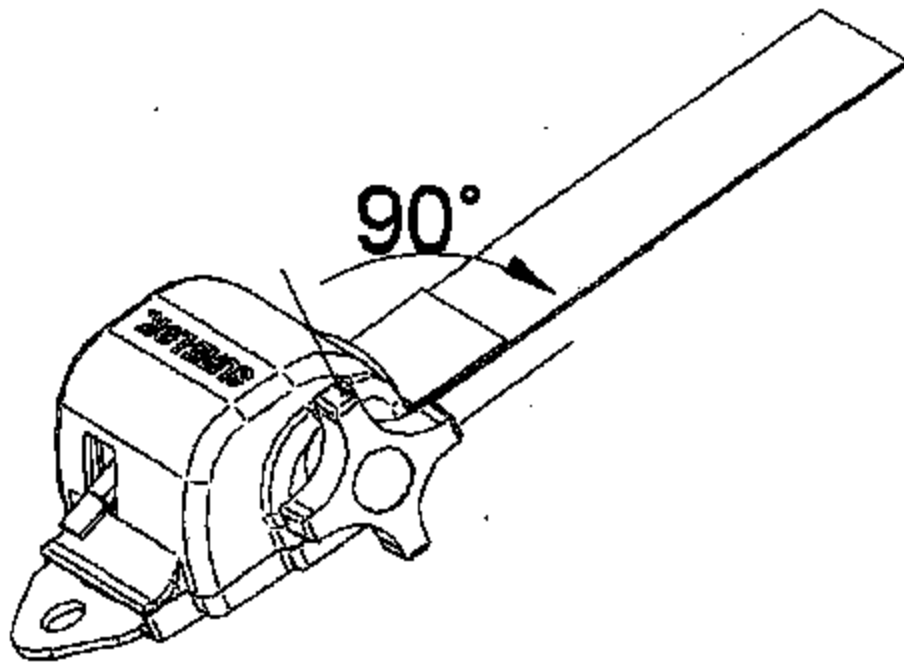
Safe and Secure

SAFETY BULLETIN

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Inspecting Units That Have A Retractor Knob:

Release the retractor strap and pull approximately 1 foot of webbing from the retractor. Position the retractor knob so that one of the lugs on the knob is at the 12:00 o'clock position. Slowly rotate the retractor knob one-quarter rotation (90 degrees) and count the clicks as the load pawl encounters the sprocket teeth. Units that are out of phase and require replacement will have 12 clicks. Contact Sure-Lok customer service at 866-787-3565.



Rotate the knob $\frac{1}{4}$ turn as shown in the picture and count the clicks

6 clicks identifies a properly functioning retractor

12 clicks identifies a defective unit that requires replacement

SURE-LOK

Safe and Secure

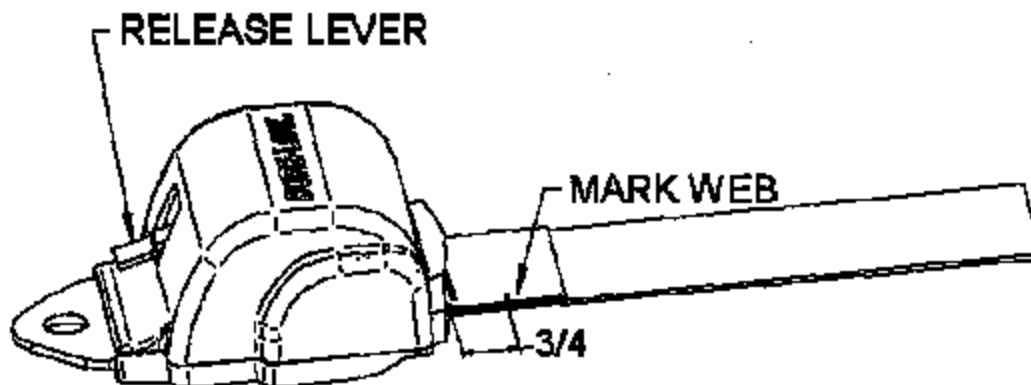
SAFETY BULLETIN

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Inspecting Units That Do Not Have A Retractor Knob:

Fully extend the webbing from the retractor, and measure $\frac{3}{4}$ inch from the entrance throat of the retractor. Draw a line on the webbing at this point $\frac{3}{4}$ inch from the entrance throat of the retractor. While holding the extended webbing taut, slowly depress the release lever to the point that it just releases the web.

Allow the webbing to be drawn into the retractor until the mark that you made is at the entrance of the retractor housing. Go slowly, one ratchet step at a time while counting the feel of ratchet clicks. It is necessary to let the release lever ride over the top of the sprocket teeth to feel the clicks. There should be the feel of six ratchet clicks encountered for a $\frac{3}{4}$ inch length of webbing. 12 clicks over the $\frac{3}{4}$ inch span of webbing indicates a defective retractor which needs to be removed from service immediately. Contact Sure-Lok customer service at 866-787-3565.



6 clicks to retract $\frac{3}{4}$ " of fully-extended web identifies a properly functioning retractor
12 clicks to retract $\frac{3}{4}$ " of fully-extended web identifies a defective unit that requires replacement