



GILLIG CORPORATION

BOX 3008
HAYWARD, CALIFORNIA
94540-3008
TELEPHONE 510/785-1500
FAX # 510/785-6819

October 6, 2004

Mr. Kenneth Weinstein
Associate Administration for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street SW
Washington, DC 20590

04V-500
(11 pages)

Dear Mr. Weinstein:

In accordance with the procedures outlined in 40CFR 573.6 Gillig is submitting the attached Safety Defect Information Report. Gillig was notified on August 19, 2004 and September 16, 2004 of a safety recall on Sure-Lok Securement Retractors supplied to Gillig by Freedman and USSC seat companies. Additionally, Gillig purchased retractors for other seat applications and After Market parts.

Gillig will coordinate the recall since one of our seat suppliers is doing the recall and the other hasn't responded. Gillig purchased parts direct form Sure-Lok also; the customer letter is ready for NHTSA's review as soon as we receive a recall number, Gillig will send the customer letters and report on the recall.

Sincerely,

GILLIG CORPORATION

Charles E. Koske
Senior Vice President, Engineering

CEK/evh
Enclosure (1)

cc: R. Birdwell



Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Report¹

On August 25, 2004, Gillig Corporation decided that a defect which relates to motor vehicle safety) 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: October 5, 2004

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

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.

Gillig Corporation 25800 Clawiter Road Hayward, California 94545

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

Charles E. Koske Sr. Vice President

Telephone Number: 510-264-5031 Fax No.: 510-264-3897

Name and Title of Person who prepared this report.

Charles E. Koske

Sr. Vice President

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 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): Gillig Corp Model Years Involved: 1999 - 2004 Model(s): Phantom and low floor

Production Dates: Beginning 7/1999 Ending: 4/2004

VIN Range: not applicable, option usage identifies vehicles to be recalled

Vehicle Type: Bus Bodystyle:

Note: Bus type and model year are not determining factors in this recall - It is application of the Sure-Lok option

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

The buses involved are equipped with Sure-Lok wheelchair securement retractor assemblies.

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.

5%

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>Potentially Involved</u>	<u>Number of Vehicles</u>
Low Floor	1999 - 2003		161
Phantom	2001 - 2004		81
Aftermarket Parts Sales	2003-2004		8
Total Number Potentially Affected by the Recall:		<u>242 vehicles</u>	
		<u>8 parts kits</u>	

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

Sure-Lok's 573 report didn't include this information. Gillig has no knowledge of the specifics.

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:

Gillig identified bus serial numbers equipped with the Sure-lok option. Sure-lok was supplied as part of seat kits purchased from Freedman seating company and USSC. Gillig also sold Sure-Lok kits via aftermarket parts distribution and will notify those owners.

III. Describe the Defect or Noncompliance

3. 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.

Gillig has no knowledge of the alleged defect. See the attached Sure-Lok 573 defect report for their explanation and expectation of a defect or failure characteristic. The securement devices are mounted in the passenger compartment of the bus.

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

Gillig has no knowledge of the cause of the alleged defect. The alleged cause of defect is contained in the Sure-Lok form 573 report (attached) which claims a failure is possible due to misalignment of the load pawl of the device.

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

Sure-Lok claims in their 573 report (attached) that it could present a safety problem in that the securement system would not actually secure the wheelchair in position in a crash.

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

Gillig has no knowledge of any warning. Sure-Lok's 573 report made no specific statement on this issue.

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

Gillig purchased the Sure-Lok securement as part of seat kits from Freedman Seating Company and USSC. Both Freedman and USSC did not file 573 reports but referred us to Sure-Lok. Gillig also purchased Sure-Lok kits direct from Sure-Lok , primarily for aftermarket distribution.

Sure-Lok, Inc.
151 Industrial Parkway
Branchburg, NJ 08876-3451

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

Sure-Lok has not provided information about their CEO or responsible officer. Their 573 report was written by their Human Resources Vice President Lynn Dornalewaki. The customer letter was from Dana Yarnell, their quality assurance manager.

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.

On August 19, 2004 Gillig received a recall letter from Sure-Lok. Gillig received a copy of their form 573 letter on August 24, 2004. Gillig was supplied the Sure Lok device by USSC seats who claim they were told they did not need to file a 573 report or inform Gillig in writing – we obtained this information via phone calls this week. Freedman Seating sent Gillig a letter dated September 16, 2004. We have been obtaining kit numbers to compare to manufacturing data to compile the recall list.

Gillig also purchased the Sure-Lok device for aftermarket distribution and we are tracing the transactions to generate that list of customers.

Gillig is not aware of any incidents involving the Sure-Lok device on Gillig buses and we have no reports of accidents, injuries, fatalities or warranty claims.

V. Identify the Remedy

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

Attached Sure-Lok Safety bulletin provides instruction for inspection of the securement retractor to determine which are acceptable and which are not. There is no visual difference between the recall condition and the remedy. See the Sure-Lok document for test method to determine defect condition.

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

See attached Sure-Lok safety bulletin.

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.

Production remedy is the installation of Sure-Lok approved components.

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.

Gillig plans to issue a recall letter within one week from the time we receive NHTSA's response to this 573 report and they assign a recall number or direct us to use the existing Sure-Lok recall number 04E-058. We will fax a draft copy of recall communication for NHTSA's review during that one week. Inspection of vehicles can take place after notification letters go out.

VII. Furnish Recall Communications

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.

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

The Privacy Act of 1974 - Public Law 93-579, As Amended: This information is requested pursuant to the authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response maybe used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administration enforcement or litigation against a manufacturer, your response, or statistical summary thereof, may be used in support of the agency's action



Sure-Lok, Inc.
151 Industrial Parkway
Branchburg, NJ 08876-3451
Tel: 908 231-1804
Fax: 908 231-6857
www.sure-lok.com

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

SURE-LOK

Safe and Secure

SAFETY BULLETIN

NHTSA RECALL #04E058

Page 1 of 3

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 teeth. 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

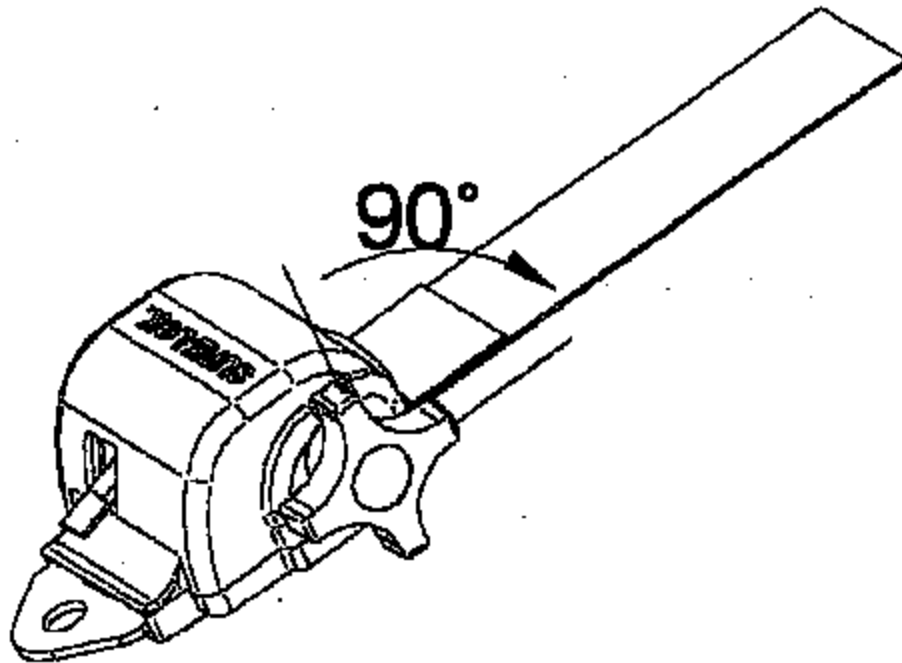
Safe and Secure

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

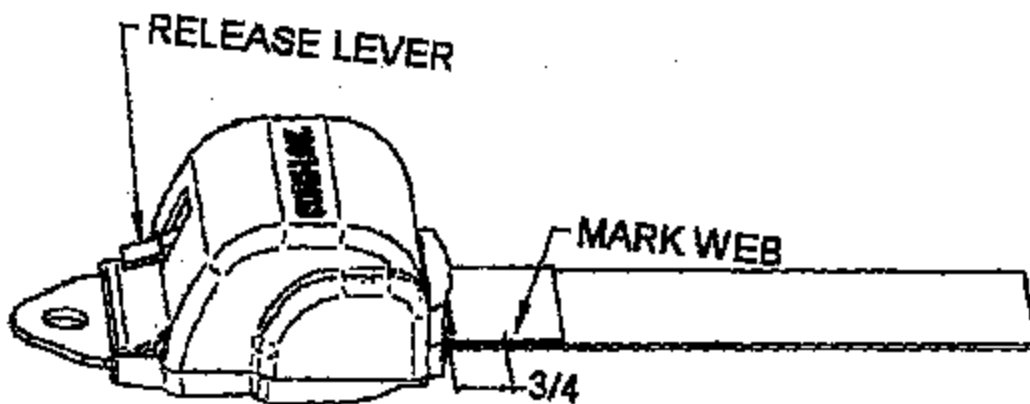
SAFETY BULLETIN

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Inspecting Units That Do Not Have A Retractor Knob:

Fully extend the webbing from the retractor, and measure $\frac{1}{4}$ inch from the entrance throat of the retractor. Draw a line on the webbing at this point $\frac{1}{4}$ 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 $\frac{1}{4}$ inch length of webbing. 12 clicks over the $\frac{1}{4}$ 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 $\frac{1}{4}$ " of fully-extended web identifies a properly functioning retractor
12 clicks to retract $\frac{1}{4}$ " of fully-extended web identifies a defective unit that requires replacement



Office of Defects Investigation

Recalls - Search Results

Recall Date : **August 4, 2004**
TYPE : **EQUIPMENT**
BUILD DATES : **Information Not Available**
MAKE : **SURE-LOK**
MODEL : **8625-13**

Make / Model :
SURE-LOK / 8625-13

Model/Build Years:
9999

NHTSA CAMPAIGN ID Number : 04E058000

Recall Date : AUG 04, 2004

Component: EQUIPMENT ADAPTIVE

Potential Number Of Units Affected : 300000

Summary:

CERTAIN SURE-LOK WHEELCHAIR TIE-DOWN SECUREMENT ASSEMBLIES P/N 8625-13. THE SPROCKET TEETH OF THE RETRACTOR ASSEMBLY MAY BE OUT OF ALIGNMENT CAUSING THE LOAD PAWL NOT TO FULLY SEAT IN THE SPROCKET TEETH

Consequence:

IN THE EVENT OF A VEHICLE CRASH, THE WHEELCHAIR MAY NOT BE ADEQUATELY SECURED POSSIBLY RESULTING IN INJURIES.

Remedy:

SURE-LOK WILL NOTIFY ITS CUSTOMERS AND REPLACE THE DEFECTIVE PART FREE OF CHARGE. THE RECALL BEGAN AUGUST 16, 2004. OWNERS WHO TAKE THEIR VEHICLES TO AN AUTHORIZED DEALER ON AN AGREED UPON SERVICE DATE AND DO NOT RECEIVE THE FREE REMEDY WITHIN A REASONABLE TIME SHOULD CONTACT AT 1-908-231-1804.

Notes:

ALSO, CUSTOMERS CAN CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S AUTO SAFETY HOTLINE AT 1-888-DASH-2-DOT (1-888-327-4236).