

DAIMLERCHRYSLER

Associate Administrator for Enforcement
National Highway Traffic Safety
Room 5326
400 Seventh Street S.W.
Washington DC 20590

04V-505
(16 pages)

DEFECT INVESTIGATION

SEP 15 P 11:34

September 30, 2004

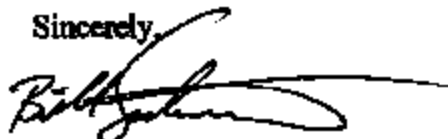
Subject: **Part 573 – DEFECT AND COMPLIANCE REPORT**
Sure-Lok Seatbelt Retractors Assembly NHTSA recall # 04E058

Daimler Chrysler Commercial Buses North Carolina is submitting information regarding a safety-related defect of a component. The defect relates to Sure-Lok Seatbelt retractor assemblies installed in certain DCCBNC commercial buses.

DCCBNC has received notification from Sure-Lok Inc, the supplier of the seatbelt retractor assembly, stating that only a few retractors may fail to perform as they should. There is no indication that this defect is related to any field reports, accidents, injuries, or warranty claims. As a result, DCCBNC Part 573 Report references the defect report submitted by Sure-Lok Inc. DCCBNC is not administering a recall or completion reports for a recall. Sure-Lok is administering all matters regarding this recall.

I have enclosed our data recorded as outlined in the 49 CFR Part 573.6. Should you have any questions or wish to discuss this matter further, please do not hesitate to contact me.

Sincerely,



Bill Soderstrom
Quality Assurance Manager
(336) 878-3816

cc: Joe Labonte Compliance and Safety Officer
Orion Bus Industries

Dana Yarnell Quality Assurance Manager
Sure-Lok Inc.

Safety Defect and Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Report⁽¹⁾

On August 24th, 2004 Sure-Lok
decided that (a defect which relates to motor vehicle safety)(a
noncompliance with Federal Motor Vehicle Safety Standard No. _____)
exists in items of motor vehicle equipment 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 2, 2004

Furnish the manufacturer's identification code for this recall (if
applicable): NHTSA recall #04E058 Bulletin 8/04

1. Identify the full corporate name of the fabricating manufacturer/brand
name/trademark owner of the recalled item of equipment. If the recalled
item of equipment is imported, provide the name and mailing address of
the designated agent as prescribed by 49 U.S.C. §30164.

Daimler Chrysler Commercial Buses North Carolina
6012 High Point Road
Greensboro North Carolina 27407

Identify the corporate official, by name and title, whom the agency should
contact with respect to this recall. **Bill Soderstrom Quality Assurance
Manager**

Telephone Number: (336) 878-3816 Fax No.: (336) 878-3627

Name and Title of Person who prepared this report.

Bill Soderstrom

Signed:

1. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:

Make: Model: Daimler Chrysler SLF

Part Number: Size: 75 vehicles effected

Function: Transportation

Other information which characterizes/distinguishes the items of equipment to be recalled: See attachment for VIN's and location

Make: Model: Daimler Chrysler CL-100

Part Number: Size: 184 vehicles effected

Function: Transportation

Model Years Involved: 2000 to 2004

Other information which characterizes/distinguishes the items of equipment to be recalled: See attachment for VIN's and location

Make: Model:

Part Number: Size:

Function:

Other information which characterizes/distinguishes the items of equipment to be recalled:

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. 100%

II. Identifying the Recall Population

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

SLF buses 74

CL-100 buses 184

Number of Items

Model Year Potentially Involved: 2000 to 2004

Total Number Potentially Affected by the Recall:

258

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance:
Unknown. See equipment manufacturer's Part 573 report related to NHTSA recall # 04E058

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 items of equipment: All buses manufactured having a DCCBNC kit number 6509989 / 6501533 / 651534 / 6501535

III. Describe the Defect or Noncompliance

See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin 8/04

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. See equipment Manufacturers Part 573 report related to NHTSA recall #04E 058 and attached bulletin 8/04

Describe the cause(s) of the defect or noncompliance condition.
See equipment manufacturers Part 573 report related to NHTSA recall # 04E 058 and attached bulletin

Describe the consequence(s) of the defect or noncompliance condition.
See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin

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

See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin.

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

Sure-Lok, Inc.

151 Industrial Parkway

Branchburg, NJ 08876-3451

Tel: (908) 231-1804

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: Dana Yarnell, Quality Assurance Manager, C/O Christine Roe, Sure-Lok Inc.

IV. Provide the Chronology in Determining the Defect/Noncompliance
Daimler Chrysler Commercial Buses became aware of this recall by way of a letter from our seat supplier (Freeman Seating) September 16, 2004
See equipment manufacturers Part 573 report to NHTSA recall #04E058 and attached bulletin.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin 8/04

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin 8/04.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin 8/04.

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

See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin 8/04.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin 8/04.

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.

See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin 8/04. DCCBNC is not administering a recall or completion reports for a recall. Sure-Lok Inc is administering all matters regarding this recall.

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.*

See equipment manufacturers Part 573 report related to NHTSA recall # 04E058 and attached bulletin 8/04. DCCBNC is not administering a recall or completion reports for a recall. Sure-Lok is administering all matters regarding this recall.

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

1. ¹Each 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) 366-5226 or by FAX at (202) 366-7882.

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
Safe and Secure

Sure-Lok, Inc.
151 Industrial Parkway
Branchburg, NJ 08876-3451
Tel 908 231-1804
Fax 908 231-6887
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.

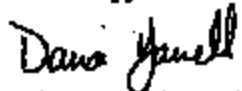
If the system is not checked as the Safety Bulletin instructs, then in a crash the wheelchair could possibly not be secured resulting in injury to the wheelchair passenger.

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 866-787-3365.

Sincerely,



Dana Yarnell, CQM, CQE, CQA
Quality Assurance Manager

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



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

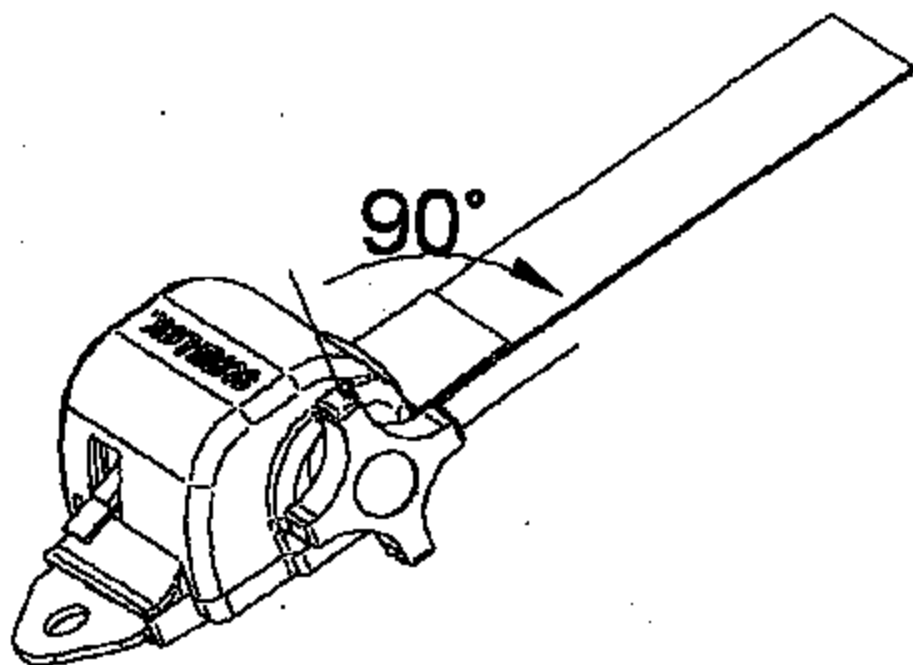
Safe and Secure

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

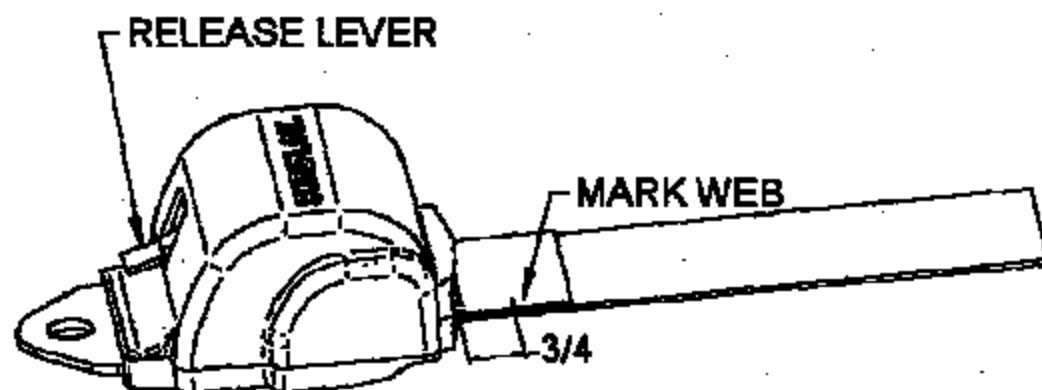
SAFETY BULLETIN

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Inspecting Units That Do Not Have A Retractor Knob:

Fully extend the webbing from the retractor, and measure $\frac{3}{4}$ 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



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 / Models :

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

Consequences:

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).

Company Name	FSC SALES#	Client PO#	Ship Date
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DAIMLER CHRYSLER COMMERCIAL BUS, NC	339314	J17160- 1 OF 15	2/25/2004
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339406	J17160- 2 OF 15	2/25/2004
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339407	J17160-3 OF 15	2/25/2004
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339408	J17160-4 OF 15	2/25/2004
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339410	J17160-5 OF 15	2/25/2004
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339411	J17160-6 OF 15	3/2/2004
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339412	J17160-7 OF 15	3/2/2004
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339413	J17160-8 OF 15	3/2/2004
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339414	J17160-9 OF 15	3/2/2004
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339415	J17160-10 OF 15	3/2/2004
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339416	J17160-11 OF 15	3/5/2004
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339417	J17160-12 OF 15	3/5/2004
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339418	J17160-13 OF 15	3/5/2004
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339419	J17160-14 OF 15	3/5/2004
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339420	J17160-15 OF 15	3/5/2004
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340037 J17160 1 OF 15 3/11/2004

340128 J17160 2 OF 15 3/11/2004

340130 J17160 3 OF 15 3/17/2004

340131 J17160 4 OF 15 3/17/2004

340132 J17160 5 OF 15 3/17/2004

340134 J17160 6 OF 15 3/17/2004

340135 J17160 7 OF 15 3/17/2004

340136 J17160 8 OF 15 3/17/2004

340138 J17160 9 OF 15 3/17/2004

340139 J17160 10 OF 15 3/17/2004

340140 J17160 11 OF 15 3/23/2004

340143 J17160 12 OF 15 3/23/2004

340144 J17160 13 OF 15 3/23/2004

340147 J17160 15 OF 15 3/23/2004