

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

04Y-509  
(7 pages)

September 2, 2004

Subject: **PART 573—DEFECT AND NONCOMPLIANCE REPORT**  
Sure-Lok Seatbelt Retractors Assembly NHTSA recall #04E058

Orion is submitting information regarding a safety-related defect of a component. The defect relates to Sure-Lok Seatbelt retractor assemblies installed in certain Orion transit buses.

Orion 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, Orion's Part 573 Report references the defect report submitted by Sure-Lok Inc. Orion is not administrating a recall or completion reports for a recall. Sure-Lok Inc is administrating 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,



Joe Labonte  
Compliance and Safety Officer  
Member of American Society of Safety Engineers  
(905) 403-7832 ext. 3335

.cc Dana Yarnell, Quality Assurance Manager, Sure-Lok Inc. care of Christine Rge,  
Sure-Lok Inc. CROE@sure-lok.com

RECEIVED  
SEP 14 2004  
1:33

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

On August 24, 2004, Sure-Lok Inc decided that a safety related defect 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: September 1, 2004

Furnish the manufacturer's identification code for this recall (if applicable): NHTSA recall #04E058, Bulletin 08/04

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.

Orion Bus Industries Inc.

---

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

Joe Labonte

Compliance and Safety Officer

Telephone Number: (905) 403-7832 ext. 3335 Fax No.: (905)403-8800

Name and Title of Person who prepared this report.

Joe Labonte

Compliance and Safety Officer

Signed: \_\_\_\_\_

**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): Orion Model Years Involved: 2000 - 2001 Model(s): II

Production Dates: Beginning: SEPTEMBER 2000 Ending: MAY 2001

VIN Range: Only the following vehicles are affected, having VIN:

1VH2B5D20Y6200191

1VH2B5D22Y6200192

1VH2B5D2316200241

1VH2B5D2516200242

1VH2B5D29Y6200187

1VH2B5D29Y6200190

Vehicle Type: Bus Bodystyle: II

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

Vehicle model Orion II  
Sold Under Order 1143 to  
DEPARTMENT OF PUBLIC WORKS  
ATTENTION: TONY KNAUER  
201 - 4TH STREET S.E., ROOM 108  
ROCHESTER, MN 55904-3740,

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. 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>II</u>	<u>2000 - 2001</u>	<u>6</u>

Total Number Potentially Affected by the Recall: 6

**4. Furnish the approximate percentage of the total number of vehicles 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 vehicles:**

**All buses manufactured having a supplier part number and Orion part numbers as follows:**

**The Sure-lok FF612 is Orion's 022128009**

**The Sure-lok FF615S is Orion's 052128101**

**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 manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04.**

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

**See equipment manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04.**

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

**See equipment manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04.**

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

**See equipment manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04.**

**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, Sure-Lok Inc. care of Christine Roe, Sure-Lok Inc.**  
**CROE@sure-lok.com**

#### **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.**

**Orion became aware of the defect by way of a letter to Orion dated August 8, 2004**

**See equipment manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04.**

**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.**

---

---

---

## 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 manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04.

---

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

---

See equipment manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04.

---

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 manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04.

---

## 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 manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04. Orion is not administrating a recall or completion reports for a recall. Sure-Lok Inc is administrating 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 manufacturer's Part 573 report related to NHTSA recall #04E058 and attached bulletin 08/04. Orion is not administrating a recall or completion reports for a recall. Sure-Lok Inc is administrating all matters regarding this recall.**

---