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October 25, 2004

**VIA FACSIMILE AND
CERTIFIED U.S. MAIL,
RETURN RECEIPT REQUESTED**

Mr. George H. Person
National Highway Traffic Safety Administration
Office of Defects Investigation
400 7th Street, S.W. NSA-11
Washington, DC 20590

Re: Defect and Non-Compliance Report

Dear Mr. Person:

Our firm is general counsel for EIDorado National (California), Inc. ("EIDorado"), 2670 Galena Street, Riverside, California 92509. EIDorado National received notification from your office dated October 18, 2004, in which your office requested information from EIDorado regarding buses containing wheelchair securement retractor assemblies manufactured by Sure-Lok, Inc. ("Sure-Lok"). Based on the information provided by Sure-Lok, it appears that the retractor assemblies have sprocket teeth out of alignment which can result in failure to restrain the wheelchair in the event of a crash. Sure-Lok has already instituted a safety recall campaign in connection with this matter. The recall number assigned by NHTSA for Sure-Lok's safety recall campaign is 04E-058.

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, we are hereby notifying the National Highway Traffic Safety Administration that certain buses manufactured by EIDorado contain the retractor assemblies that have been determined by Sure-Lok to have a defect that relates to motor vehicle safety.

As more specifically set forth below, Sure-Lok has agreed to conduct the recall campaign involving these defective retractor assemblies, including but not limited to providing notification to all of EIDorado's potential customers that are subject to the recall campaign, providing the necessary parts to repair the defective retractor assemblies, and filing the quarterly reports in connection with the recall campaign.

04E-534
(3 pages)

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- A. Recall Population and Vehicle Identification. At this time, EIDorado is in the process of determining the number of buses that could potentially contain the defective Sure-Lok retractor assemblies. Sure-Lok has advised EIDorado that it sold 144 of the defective retractor assemblies to EIDorado. EIDorado does not track its buses by the particular type of retractor assemblies used on the buses. As a result, EIDorado must determine the range of buses that could potentially contain the defective Sure-Lok retractor assemblies. EIDorado is in the process of identifying the range of buses that could contain these defective retractor assemblies. Upon completing this identification process, EIDorado will properly identify its recall population and provide NHTSA with the vehicle identification information.
- B. Description of Defect. All of the buses that will be subject to this recall campaign may contain the Sure-Lok wheelchair securement retractor assemblies with the sprocket teeth out of alignment, which could result in the failure to restrain the wheelchair in the event of a crash.
- C. Basis for Determining that a Defect Exists. EIDorado received notification from Sure-Lok that a potential defect with the retractor assemblies may exist.
- D. Remedying of Defect. As set forth in the notifications issued by Sure-Lok in connection with recall campaign 04E-058, the retractor assemblies determined to be defective must be removed from service immediately and returned to Sure-Lok for replacement. Sure-Lok has agreed to replace the defective retractor assemblies without charge to the owners.
- In order for Sure-Lok to remedy the defect referred to above, all of the owners of the buses sold by EIDorado that are subject to this recall campaign must be notified. EIDorado will provide Sure-Lok with the names and addresses of the current owners of such buses. Sure-Lok will implement the recall campaign in accordance with the procedures specified in recall campaign 04E-058.
- E. Owner Notifications. Sure-Lok has agreed to provide the notification letters to the owners of the buses that are subject to this recall campaign in accordance with the procedures specified in recall campaign 04E-058.
- F. Quarterly Reporting Requirements. Sure-Lok will be responsible for filing quarterly reports in connection with recall campaign 04E-058. Because the information included by Sure-Lok in its quarterly reports will encompass the remedying of the EIDorado buses subject to this recall campaign, EIDorado will not file quarterly reports to avoid duplication.
- G. Campaign Number. EIDorado does not have an internal campaign number for this recall. EIDorado will use the recall campaign number assigned by NHTSA.

Mr. George H. Person

October 25, 2004

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Please contact the undersigned at (937) 492-1271 if you have any questions after you have had an opportunity to review the enclosed information. Otherwise, our office will provide NHTSA with the updated information necessary to implement the recall campaign after a final determination has been made regarding the recall population.

Very truly yours,

A handwritten signature in black ink that reads "Daniel A. Bensman". The signature is written in a cursive, slightly slanted style.

Daniel A. Bensman

dja

cc: Eldorado National (California), Inc. (via fax)
Mr. John M. Garmhausen

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