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December 16, 2004

**VIA E-MAIL**

Ms. Patricia Wallace  
National Highway Traffic Safety Administration  
400 7<sup>th</sup> Street, S.W.  
Washington, DC 20590

Re: General Coach America, Inc. Recall Campaign  
Defect and Non-Compliance Report

Dear Ms. Wallace:

Our office is general counsel for General Coach America, Inc. ("General Coach"), which is located in Imlay City, Michigan. On behalf of General Coach, we are hereby notifying the National Highway Traffic Safety Administration of a non-compliance with Federal Motor Vehicle Safety Standard No. 217 that exists in certain buses listed below. This notification is being furnished in accordance with 49 CFR Part 573 entitled Defect and Non-Compliance Reports.

1. Manufacturer's Name.  
General Coach America, Inc.  
275 Graham Road  
P.O. Box 397  
Imlay City, Michigan 48444  
Contact Person: Deborah Morse  
Telephone Number: (810) 724-1753, ext. 399  
Fax Number: (810) 724-6478
2. Vehicle Models Subject to Recall Campaign. General Coach has determined that the non-compliance referred to below may be present on certain M1030, M1030L, M1035, and M1035L model buses built for the 2002 through 2005 model years. The total number of buses subject to this recall campaign is 111. These buses were manufactured during the period from September, 2001 through October, 2004. The information available to General Coach indicates that 100% of the buses subject to the recall campaign may contain the non-compliance.

04V-599  
(5 pages)

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ADMINISTRATION  
WASHINGTON, DC

3. Description of Non-Compliance. General Coach has determined that the buses subject to this recall campaign fail to conform to the requirements of Federal Motor Vehicle Safety Standard No. 217 entitled "Bus Emergency Exits and Window Retention and Release." Specifically, the buses fail to satisfy part S5.5.1 which states that each emergency exit shall have the designation "Emergency Exit" followed by concise operating instructions describing each motion necessary to unlatch and open the exit, located within 16 centimeters of the release mechanism. The instruction labels for the emergency exits may not have been placed on the emergency exit windows of the buses subject to this recall campaign, as required by Standard No. 217.
  
4. Chronology of Events.
  - a. On September 29, 2004, the NHTSA Office of Vehicle Compliance inspected an ABC M1000 Series bus at the BusCon Trade Show and determined that the emergency exits did not have instruction labels.
  
  - b. On October 7, 2004, General Coach received a request for information from NHTSA with respect to General Coach's compliance with FMVSS No. 217. On November 17, 2004, General Coach responded to the information request made by NHTSA.
  
  - c. In connection with its investigation of the emergency exit label requirements, General Coach determined that the buses subject to this recall campaign also may not contain the proper labels required by FMVSS No. 217.
  
  - d. On November 23, 2004, General Coach was advised by Amanda Prescott that a safety recall campaign would need to be initiated with respect to the M1000 Series buses that do not contain the proper emergency exit labels.
  
5. Remedying of Non-Compliance. The program to be implemented by General Coach to remedy the non-compliance will include notification to all registered owners of the subject buses. The owner notification letter is enclosed as Attachment 1. The notification will contain the proper labels to designate the emergency exit and provide proper operating instructions for the use of the emergency exit. The owners will also be provided with Service Information Document No. SID\_2004-45 that describes the steps to be taken in order to properly place the instruction labels on the emergency exits. A copy of Service Information Document No. SID\_2004-45 is enclosed as Attachment 2. The owner notification letter will also contain a customer response postcard that will need to be sent by the owner to General Coach after the labels have been attached. Upon receipt of these customer response postcards, General Coach will reimburse each owner that completes the corrective action in the amount of \$15.00 to cover the expense incurred in placing the instruction labels on the emergency exits.

The enclosed owner notification letter and service information document are being submitted for your pre-review. General Coach intends to mail the owner notification

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letters and service information documents within 30 days after receipt of approval from your office.

6. Campaign Number. General Coach does not have an internal campaign number for this recall. General Coach will use the recall campaign number assigned by NHTSA.

I would appreciate your providing me with a pre-review determination of the enclosed documents at your earliest convenience. I trust that you will find the enclosed documents comply with the NHTSA regulations and will approve the documents for form and content. If you need any additional information regarding this recall campaign, please feel free to contact me.

Thank you for your prompt attention to this matter.

Very truly yours,

Daniel A. Bensman

dja

Enclosures

cc: General Coach America, Inc.

Attachment 1

## **SAFETY CAMPAIGN NOTICE**

**NHTSA Reference Number 04V-\_\_\_\_**

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

General Coach America, Inc.(General Coach) has decided that a noncompliance that relates to motor vehicle safety exists in certain M1030, M1030L, M1035, and M1035L model buses built in 2002, 2003, 2004 and 2005, which fail to conform to the requirements of part S5.5.1 of Federal Motor Vehicle Safety Standard No. 217, "Bus emergency exits and window retention and release". FMVSS S5.5.1 states that each emergency exit shall have the designation "Emergency Exit" followed by concise operating instructions describing each motion necessary to unlatch and open the exit, located within 16 centimeters of the release mechanism. The operating instruction decals for the emergency latches may not have been placed on the emergency exit windows.

The enclosed window decals must be installed as soon as possible to prevent injuries in the case of an accident. Attached is the Service Information Document #SID\_2004-45 that describes the steps to be taken to remedy this noncompliance by providing for the proper placement of the window decal. Upon placement of the window decal, please return the enclosed customer response card to General Coach to confirm that the noncompliance has been remedied. Upon receipt of the customer response card, General Coach will reimburse you the sum of \$15.00 to cover the expense incurred in placing the decals on the emergency exit windows.

If you do not have the facilities to perform this repair at your location, an authorized General Coach America service center will perform those repairs for you free of charge. The repairs will take approximately .25 hours to complete. If you need information on the nearest General Coach service center, please call the General Coach Service Center at (810) 724-1753 ext. 405 or toll free at (800) 842-0622 ext. 405.

If you experience difficulties with this procedure or are otherwise unable to comply with this notice, you may contact the Service Department at General Coach, (800) 842-0622. If General Coach is unable to provide assistance for you, you may contact the Administrator of N.H.T.S.A., 400 Seventh Street, SW, Washington, D.C. 20590 or toll free through the Auto Safety Hotline at 1-888-327-4236.

You may be eligible to receive reimbursement for the cost of obtaining a pre-notification remedy of a problem associated with this recall. For more information contact General Coach at 1-800-842-0622.

Federal Regulations require any lessor receiving this letter to forward it to the lessee within 10 days.

We apologize for any inconvenience this campaign may cause you. As always our first priority is the safety of the people using our products.

Sincerely,

Dick Cutcher  
Service Manager  
General Coach America, Inc.

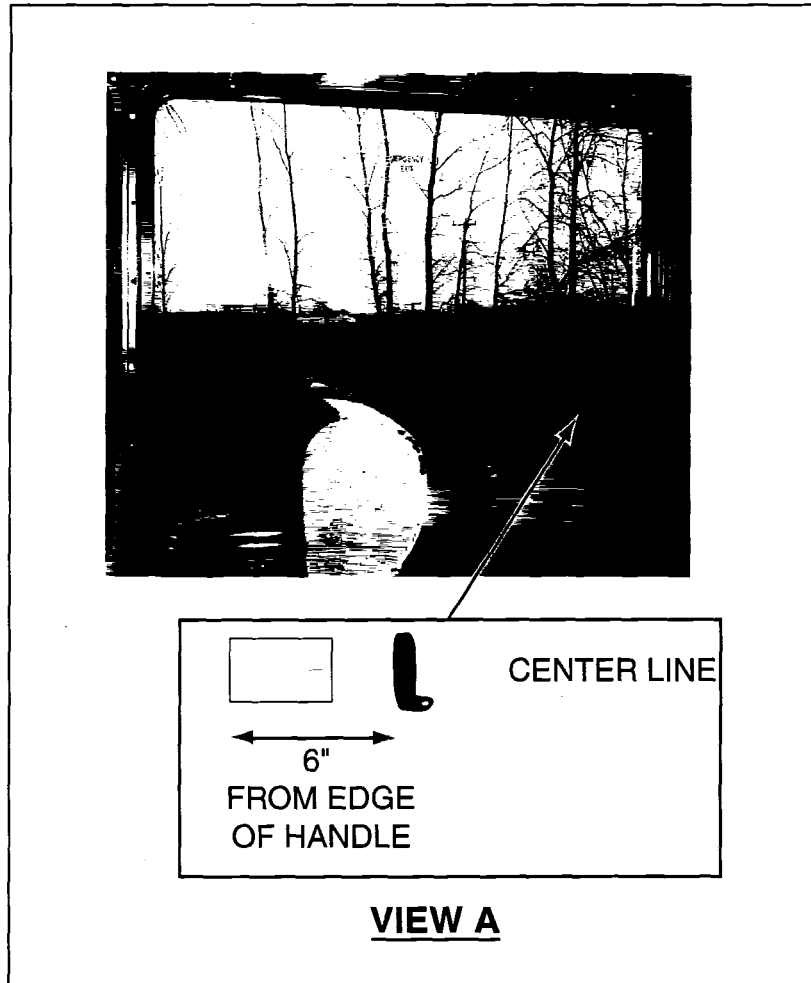
**Purpose:**

To properly locate and install window decal.

**Perform the Following:**

**INSTALL WINDOW DECALS**

1. Clean window glass with ammonia in area indicated in fig 1.
2. Place "INSTRUCTION DECAL" toward bottom of window 6" over from edge of handle, and aligned with the center of the handle. (Refer to Fig. 1 VIEW A)
3. Smooth decal with a squeegee to remove air bubbles.



**Fig. 1 DECAL LOCATION**