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Division of Independent Protection Co., Inc.

67819 State Road 15 New Paris, Indiana 46563

2004 APR 13 A 8:47

OFFICE OF
DEFECTS INVESTIGATION

Ms. Judy Taylor
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC 20590
April 6, 2004

RE: Safety Recall Campaign
Turtle Top Recall Campaign Number: RCN-040312
National Highway Safety Administration Assigned Recall Number: 04V-149

Dear Ms. Taylor,

Enclosed please find a final hard copy of our customer notification letter, with changes per your recommendations in your fax dated 04-01-04. Also enclosed is a copy of our letter to our dealers and the Technical Service Bulletin for the instructions to change the AD-100 electric door motor assembly emergency release handle.

Sincerely,

Janet L. Kercher-Dudley
Standards Engineer

Turtle Top
A Division of Independent Protection Co, Inc.
67819 State Road 15
New Paris, IN 46553
Phone: (800)296-2105 ext. 146
Fax: (574)831-3407
janetd@turtletop.com
www.turtletop.com

Enclosures



Division of Independent Protection Co., Inc.

67819 State Road 15 New Paris, Indiana 46553

your Dealer should have the parts in stock. When you take your vehicle to your dealer, show the dealer this letter. If this letter is misplaced, your dealer will still do the work free of charge to you. If your vehicle has already had the remedy performed prior to this recall, Turtle Top will reimburse owners for pre-notification remedies.

If you or your organization is the lessor of the affected vehicle, then you are required by federal regulations to notify the vehicle lessee by first class mail within ten (10) days from receipt of this letter of this recall.

Address or ownership change:

If you have changed your address, sold or traded your vehicle, please let us know. Please fill out the enclosed change of address / vehicle ownership postage paid postcard and drop it in the mail to us as soon as possible. Your cooperation in supplying subsequent vehicle ownership information is greatly appreciated.

If you have any questions:

Turtle Top customer service/warranty department will be happy to assist you with any questions or if you have any problem obtaining the needed repair.

Call: (574) 834-4340 or (800)296-2105 extensions 181 or 131

Office Hours: Monday-Friday: 8:00 a.m. – 5:00 p.m.

Or you may contact us through the Internet at: www.turtletop.com

After contacting your dealer or Turtle Top, if you are still not able to have the safety defect remedied without charge and within a reasonable time, you may submit a written complaint to the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, SW, Washington, DC 20590 or call 1-888-327-4236.

Thank you for your attention to this important safety matter. We regret any inconvenience this recall may cause you.

Sincerely,

Janet L. Kercher-Dudley
Standards Engineer / RCN-040312 Administrator
Turtle Top

Enclosure – Change of Address / Vehicle Ownership Postcard



Division of Independent Protection Co., Inc.

67819 State Road 15 New Paris, Indiana 46553

SAFETY RECALL NOTICE

April 7, 2004

Turtle Top Recall Campaign Number: RCN-040312

National Highway Traffic Safety Administration Assigned Recall Number: 04V-149

Vehicle ID Number: _____

Turtle Top ID Number: _____

End-User Customer Name

Address

City, ST zip

Dear _____,

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

Turtle Top has decided that a defect which relates to motor vehicle safety exists in Van Terras and Terra Transports manufactured between May 01, 2002 and March 12, 2004. This recall affects vehicles installed with an AD-100 electric door motor assembly emergency release handle (lever).

What the safety concern is:

The electric door motor assembly emergency release handle (lever) could possibly break when pulling on the handle for emergency egress to open the side entry / exit door. The handle breakage could potentially occur on the extension arm where the handle body attaches to the door motor assembly. Egress through the side entry / exit door could be difficult if the handle assembly breaks increasing the risk of personal injury to occupants.

What is involved in this recall:

Vehicle owners are to contact their dealer for scheduling the recall service work. Turtle Top dealers or approved service centers will remove the emergency release handle and reinstall a replacement handle in affected vehicles. Service work to vehicle owners will be done without charge (parts and labor).

The time it takes to perform the recall service work is less than 15 minutes. Due to scheduling issues, your dealer may need your vehicle for a longer period of time.

What we are requesting you do:

Contact your dealer as soon as possible to schedule a service date and check that parts are in stock for recall number RCN 040312. Parts are immediately available and



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**AD-100 Electric Door Motor Assembly
Emergency Release Handle Change Instructions
RCN-040312 (NHTSA Assigned Recall # 04V-149)**

BULLETIN NO.
TSB-040312

Models: Van Terra and Terra Transport

Issue: The electric door motor assembly handle (lever) could possibly break when pulling on the handle for emergency release to open the side entry / exit door.

Required Parts: AD-100 Emergency Release Handle (Lever) Replacement Kit—Turtle Top Part # SP105643.

Kit includes: (1) emergency release door handle assembly, (1) push rod shaft (1) 9/64ths allen wrench, (1) emergency release instruction sign, (2) handle mounting bolts, (2) sign mounting screws, (1) instruction sheet, (1) vehicle ID and recall work completion form and (1) return address label for returning parts and paperwork to Turtle Top.

Procedure: Refer to photos and instructions in this bulletin. The door motor handle (lever) to change is next to the curb-side entry / exit door and is shown in Photo 1. The cover piece over the door motor assembly may be ABS plastic, vinyl upholstery or wood. The handle can be changed without removing the cover piece.

1. Unscrew the two mounting bolts holding the door motor handle assembly with the 9/64ths allen wrench provided in your repair kit. A power drill may be used with a 9/64ths allen key. If the mounting bolts are not fully exposed because of the position of felt backing material around the mounting bolts, carefully trim the felt away using a stanley knife. (Photo 1)
2. Gently remove the handle assembly, the push rod shaft is exposed under where the handle assembly was mounted. There is a spring on the shaft. This spring will be used with the new handle assembly. (Photo 2)



Photo 2



Photo 3



Photo 1

3. Remove push rod shaft by pulling outward and remove spring from shaft. Place this same spring on new shaft included in kit and reinstall new shaft in hole. (Photo 3) Note that new shaft has end that is flush with end of white bushing on the shaft. Old shaft has end that protrudes from bushing. (Photo 2)



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**AD-100 Electric Door Motor Assembly
Emergency Release Handle Change Instructions
RCN-040312 (NHTSA Assigned Recall # 04V-149)**

BULLETIN NO.
TSB-040312

4. Before installing new handle note very small "dimple" on the handle assembly. This dimple aligns the handle for mounting. (Photo 4)
5. Place the mounting hole on the handle assembly that is nearest to the dimple in the highest position. Install new bolts included in the kit to mount the handle assembly to the door motor assembly. Hand tighten mounting bolts snug. (Photo 5)
6. Change the EMERGENCY RELEASE instruction sign with the sign included in the kit. This is important as the new sign instructs to turn the lever and the old sign instructed to pull the lever. (Photo 6)

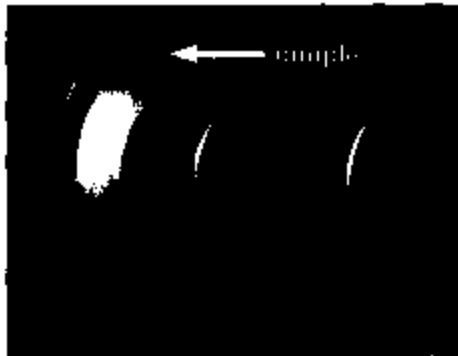


Photo 4



Photo 5

Verification: It is very important to verify the door handle is set correctly and that the door will open when the handle is engaged. To check that the door handle will release the door, make sure the door is open at less than a 90 degree angle from the side of the vehicle. Begin with the handle in the upward position as installed. Turn the handle counter-clockwise until it stops. You should be able to freely open and close the door and it should swing smoothly. Return handle to up position. (Photo 6)

Operation Time: 15 minutes.

Other Applicable Articles: Additional Tool(s): Phillips and/or square head bit for the screws to change the Emergency Release instruction sign. Stanley knife.

Warranty Status: For reimbursement the removed parts (handle, shaft and mounting bolts) must be returned to Turtle Top along with the vehicle ID and recall work completion form completely filled out by the servicing dealer.



Photo 6



Division of Independent Protection Co., Inc.

67819 State Road 15 New Paris, Indiana 46353

SAFETY RECALL NOTICE

April 06, 2004

Turtle Top Recall Campaign Number: RCN-040312
National Highway Traffic Safety Administration Assigned Recall Number: 04V-149

Dealer Name
Address
City, ST zip

Dear Dealer,

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

Turtle Top has decided that a defect which relates to motor vehicle safety exists in Van Terra and Terra Transports manufactured between May 01, 2002 and March 12, 2004. This recall affects vehicles installed with an AD-100 electric door motor assembly emergency release handle (lever).

What the safety concern is:

The electric door motor assembly emergency release handle (lever) could possibly break when pulling on the handle for emergency egress to open the side entry / exit door. The handle breakage could potentially occur on the extension arm where the handle body attaches to the door motor assembly. Egress through the side entry / exit door could be difficult if the handle assembly breaks increasing the risk of personal injury to occupants.

Some of the involved vehicles may still be in your dealer inventory. Federal law requires you to complete the recall service work on these vehicles before retail delivery.

What is involved in this recall:

Vehicle owners will be instructed to contact their dealer for recall service work. Turtle Top dealers or approved service centers will remove the emergency release handle and reinstall a replacement handle in affected vehicles. Service work to vehicle owners will be done without charge (parts and labor). Transportation costs will not be reimbursed. Reimbursement for recall service work will be credit to your dealership upon receipt into Turtle Top of the appropriate completed recall paperwork and return of the recalled parts. A copy of the recall policy and procedure guideline is enclosed.

Should your dealership have affected vehicles in your inventory, the service work must be completed prior to finalizing the sale and delivery to a vehicle purchaser. Also,



Division of Independent Protection Co., Inc.

67819 State Road 15 New Paris, Indiana 46553

should your dealership be a lessor, any lessees must be notified by first class mail within ten (10) days from receipt of this letter.

Recall repair parts kits are immediately available from Turtle Top. The kit part number is SP105643. The time it takes to perform the recall service work is less than 15 minutes. Service instructions, paperwork to fill out and a return address label for returning the parts to Turtle Top will be included in the repair kit. A copy of the instructions, TSB-040312, is included with this letter.

Owner address or change to ownership:

Turtle Top will begin mailing out notification letters to vehicle owners on April 8, 2004. We have compiled a listing of affected units sold through your dealership which is enclosed with this letter. Since some vehicle owners do not return their warranty registration cards, in order to register their vehicle with Turtle Top, there are incomplete ownership records that we wish to finalize in order trace owners of affected vehicles. We would appreciate it if you could check your records and provide updated vehicle ownership information on individuals / organizations that have purchased Van Teras or Terra Transports through your dealership. Your cooperation in supplying vehicle ownership information is greatly appreciated.

If you have any questions:

Turtle Top customer service/warranty department will be happy to assist you with any questions.

Call: (574) 834-4340 or (800)296-2105 extensions 181 or 131

Office Hours: Monday-Friday: 8:00 a.m. – 5:00 p.m.

Or you may contact us through the Internet at: www.turtletop.com

Thank you for your attention to this important safety matter. We regret any inconvenience this recall may cause and appreciate your cooperation in correcting this matter.

Sincerely,

Janet L. Kercher-Dudley
Standards Engineer / RCN-040312 Administrator
Turtle Top

Enclosure – Technical Service Bulletin 040312
Enclosure – Recall Work Policy and Procedure
Enclosure – Dealer Specific List of Affected Units