06V-191

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Responsibility and Reports[1]

On June 26, **2006,** Elkhart **[MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. _____) exits 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 Responsibility and Reports.**

Date this report was prepared: May 22nd 2006 (Finished May 24th)

Furnish the manufacturer's identification code for this recall (if applicable): EGC CC7

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.

Shyvel Bus, a Division of Forest River

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

Bob Froelich, Design Engineer

Telephone Number: 574 262 2212 x3665 **Fax No.:** 574 264 9036

Name and Title of Person who prepared this report.

Bob Froelich

Design Engineer

Signed:

[1] Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210 or by FAX at (202) 366-7882.

Please see attached document

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): ____________ **Model Years Involved:** ________**Model(s):** ____________________

Production Dates: Beginning: _______ **Ending:**

VIN Range: Beginning: __________________ **Ending:** _________________

Vehicle Type: _________ **Bodystyle:** ____

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

____

____

Make(s): ____________ **Model Years Involved:** ________**Model(s):** ____________________

Production Dates: Beginning: _______ **Ending:**

VIN Range: Beginning: __________________ **Ending:** _________________

Vehicle Type: _________ **Bodystyle:** ____

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

____

____

Make(s): ____________ **Model Years Involved:** ________**Model(s):** ____________________

Production Dates: Beginning: _______ **Ending:**

VIN Range: Beginning: __________________ **Ending:** _________________

Vehicle Type: _________ **Bodystyle:** ____

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

____

____

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.

II. Identify the Recall Population

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

Vehicles Model	Year	Number of Potentially Involved
Universal	2005	9

Total Number Potentially Affected by the Recall: 9

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 9

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:

Vicon supplied us with serial #'s of liftgates, which we have cross-referenced to our VIN's. We then found 9 involved.

III. Describe the Defect or Noncompliance

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.

The potential defect is in the vertical arm weld joint

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

Risers determined is the result of welds not achieving full penetration.

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

The weld joint can crack, which make the lift difficult to close

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

Visible cracked weld joints, difficulty opening lift, visibly out of square

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

Riser Corporation

7900 Nelson Road

Riverside City, CA 91402

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

William Baldwin - President

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

See attached document

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.

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 attached document.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

Everlast to stay in contact w/ Rion as units are checked for non compliance. As units arrive & are found to have defect, Rion will ship new vertical arms for replacement. We & Everlast also staying in close contact to ensure this is complete.

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

Component will have cracked weld joint. Remedy component same part, but need new weld joint.

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.

We at Everlast installed 9 lifts containing the defect. Rion corrected the problem at their facility and notified us of the possible non-compliant lifts. Rion had the issue corrected before we knew there was a problem. We are now working to correct any of the 9 units that left our facility. (possible)

VI. Identify the Recall Schedule

10. 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.

All 9 vehicles have been inspected as of May 17th. Four out of nine showed cracks & were entered Consumer Parts for these four should be at Everlast on the 24th, with all repairs complete by the 26th of May.

VII. Furnish Recall Communications

11. 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.***

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

See attached.

- Supplemental Documentation –

I. Identify the Vehicle Models Involved In The Recall

Unit	Ricon Serial #	Ricon Part #	Glaval Unit #	VIN
1	188257	K2010-F1020000A	5420	1FDXE45P25HB44179
2	188258	K2010-F1020000A	5421	1FDXE45P05HB48831
3	188256	K2010-F1020000A	5422	1FDXE45P85HB48835
4	188259	K2010-F1020000A	5423	1FDXE45PX5HB48836
5	188260	K2010-F1020000A	5424	1FDXE45P35HB48838
6	188261	K2010-F1020000A	5425	1FDXE45P15HB48840
7	188262	K2010-F1020000A	5426	1FDXE45P35HB48841
8	188263	K2010-F1020000A	5427	1FDXE45P55HB48842
9	188264	K2010-F1020000A	5428	1FDXE45P75HB48843

All 9 units are the same make, model, year, type & body style as listed below:

Make: Ford
Model Year: 2005
Model: 25' Universal
Production Dates: Beginning: 07/14/05 End: 08/30/05
Vehicle Type: Bus
Body style: E450

We manufactured 85 total buses between these dates, but only 9 are affected. (10.59%)
We sorted out recalled units using Ricon's supplied list of affected serial #'s.

IV. Provide the Chronology in Determining the Defect/Noncompliance.

6.
What Ricon Has Done:
06/12/05 Ricon begins production of vertical arms on 2d robotic welder.
06/15/05 Ricon Quality Assurance identifies problems with welds
07/01/05 Internal corrective actions / additional process steps added to weld internal seam.
07/01/05 Internal testing to verify process changes (pull tests)
08/16/05 First notification from OEM of cracked welds
09/06/05 First notification from end user of cracked welds
01/05/06 Receipt of NHTSA ODI Resume
01/13/06 Additional laboratory testing at Ricon (simulating cracked welds)

What Glaval Has Done:

A. Shortly after March 17, 2006 John Skelton (Engineering Manager for Glaval) received a letter from Ricon noting the recall. *(Labeled "Figure 1")*

B. Within a few days, John Skelton notified Larry McNutt, Director of Customer Support @ Ricon with affected VIN #'s via email, and the dealer these vehicles were sold to. Ricon at this point said they would contact them directly.
C. Shortly after May 5th, 2006, Forest River, Inc (Glaval's Corp. Office) received a letter from the Recall Management Division stating we need to respond by May 16th. *(Labeled "Figure 2")*
D. I responded on May 12th, 2006 to Barbara E. Cooke via email. Same day contacted Overland Custom Coach (Our bus dealer) to make sure they were contacted from Ricon. They were not aware, nor the end user. Ricon was contacted by myself, and have since sent Overland the appropriate paperwork. I also faxed Overland a copy of what we had for the recall. *(Labeled "Figure 1")*
E. 05/18/06: Received another copy of the letter from Recall Management Division stating we need to respond by May 16th. *(Labeled "Figure 3")*

V. Identify the Remedy

Ricon is in direct contact with our dealer (Overland Custom Coach), who is a Ricon authorized service center. Overland will be contacting Ricon with claims, which Ricon will then furnish the necessary parts and payment for labor.

I am responding to a letter dated May 6th, to "Forest River" concerning the Ricon recall of "Vertical Arms". (Ref: EQ06-007) We are responding to you from Glaval Bus, A Division Of Forest River.

We are aware of the situation, and have linked Ricon's serial #'s with our VIN #'s as follows:

Unit	Ricon Serial #	Ricon Part #	Glaval Unit #	VIN
1	188257	K2010-F1020000A	5420	1FDXE45P25HB44179
2	188258	K2010-F1020000A	5421	1FDXE45P05HB48831
3	188256	K2010-F1020000A	5422	1FDXE45P85HB48835
4	188259	K2010-F1020000A	5423	1FDXE45PX5HB48836
5	188260	K2010-F1020000A	5424	1FDXE45P35HB48838
6	188261	K2010-F1020000A	5425	1FDXE45P15HB48840
7	188262	K2010-F1020000A	5426	1FDXE45P35HB48841
8	188263	K2010-F1020000A	5427	1FDXE45P55HB48842
9	188264	K2010-F1020000A	5428	1FDXE45P75HB48843

All 9 units belong to the same end user, listed below:

'0

I included an email from Ricon to myself, which I received a few moments ago to show current status.

Dear Rob,

Ricon has already notified your customer, Overland Custom Coach by registered mail earlier this week. Do you want to send something again? If so, I have attached a copy of our letter to Bart Dries.

Give me a call if you have any questions.

Thanks,

I am currently working with Bart Dries @ Overland Custom Coach to resolve this recall. Please let me know if you require any further information from us at Glaval Bus so I can promptly respond. As stated in the letter from you, we have until May 16, 2006 to respond. Can you please email me back to show acknowledgement that I have submitted a response?

Note: Overland Custom Coach is our dealer in Canada, which in turn sold the vehicle to a Canadian company. Do we need to contact another agency such as yourself on the Canadian side, or will Ricon be responsible for this?

Thank you,

"Figure 1"

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March 17, 2006

Mr. John Skelton
Glaval Bus
914 County Road 1
P O Box 1647
Elkhart, IN 46515-1647

RE: Equipment Defect Notification

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

Dear Mr. Skelton,

Ricon Corp. needs your assistance in notifying your customers about a recall of certain wheelchair lift products built between June 12, 2005 and July 1, 2005 inclusive. Ricon Corporation has determined that a defect may exist in certain wheelchair lifts manufactured by Ricon on the above dates.

WHAT IS BEING RECALLED:

This recall process applies to the "Vertical Arms" only that were used on Ricon's "1200, 2000 and 5500" series platform lifts. It does not apply to other Ricon products.

WHY IS IT BEING RECALLED:

The potential defect is the result of a welding process that may not have achieved full penetration along the seam of the weld. Through our testing and analysis we have determined that a weld with less than full penetration will exhibit signs of cracking along the exterior portion of the vertical arm. This will be most visible when the lift is in the **stowed** position since this is when the weld joint is in tension. Signs of cracking **may not** be visible when the platform is **at floor level or below or is occupied** because the weld joint is in compression at this time. We are not certain how many cycles it takes for the problem to surface. However, once a weld joint cracks, the lift will become difficult to stow or deploy. During these operations the lift will typically twist to one side and often hit the door frame of the vehicle. When stowed, the lift will typically lean into the vehicle more than normal. Both conditions are easily noticed by a driver or attendant.

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WHAT YOU AS THE OEM NEED TO DO:

Ricon has enclosed a complete list of the lifts you purchased that were manufactured during the specified time period. We have included all lift models and serial numbers. **This information will help you identify your end-user customers and provide the following instructions to them:**

1. Place the vehicle in a safe position and operate the lift through one complete cycle unoccupied.
2. With the lift in the stowed position, inspect the exterior weld seams on each side of BOTH vertical arms looking for visible signs of cracking.
3. If the lift operates normally and you have seen no signs of cracking along the weld joints, the lift may continue to be safely operated. This visual inspection should be repeated during each scheduled maintenance interval as outlined in the Ricon operator's manual.

If there are visible signs of cracking, or you have difficulty deploying or stowing the lift, the operator should take the following steps:

a. Return the lift to the stowed position in the vehicle and turn off power to the hand control.
b. Tag the lift to show it is NOT OPERATIONAL following your own "lockout/red tag" procedures.
c. Contact Ricon Customer Support Dept at 800-322-2884 to report the lift's condition.
d. DO NOT USE THE LIFT again until an authorized factory-trained technician has completed all repairs.

WHAT RICON CORPORATION WILL DO:

Upon notification from your end-user customer, Ricon will work with them to replace the vertical arm (s) as quickly as possible. If the end-user is already factory trained to perform this service, the repairs can be done at the operator's location. If the end-user is not factory trained to perform this service, we will arrange for the repairs to be done at the nearest Ricon authorized service center/dealer. In some cases, we may have these repairs performed by Ricon Corp. personnel.

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The lift repair requires replacement of the cracked vertical arm (s). Ricon has elected to replace both arms on each lift even if both are not cracked. We will provide all the necessary replacement parts at No Charge. If the repairs are done by the end-user, Ricon will pay one-hour labor at $62.00 in accordance with our " Labor Allowance Schedule".

Ricon will provide a full one-year parts and labor warranty on the new arms.

If the lift is repaired by an authorized Ricon dealer and it is not completed within 3 business days, please notify Ricon Customer Support at the toll free number listed above.

If, after contacting the authorized dealer and Ricon Customer Support, your repair is not completed in a reasonable time and without charge you may notify:

Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S W
Washington, D. C. 20590
Phone (888) 327-4236
(D.C. residents only – 202-366-0123)

Ricon Corp. will take responsibility for compiling and submitting required "Quarterly Reports" to NHTSA covering end-user repairs upon receipt of the customer (end-user) contact information from each OEM.

Thank you for you prompt attention to this matter. If you have any questions concerning these procedures please contact the undersigned at (818) 267-3075 or by email at **lmcutt@riconcorp.com**.

LMCNUTT@RICONCORP.COM.

Sincerely,

Larry McNutt
Director of Customer Support
Ricon Corp.

Figure 2

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

400 Seventh Street, S.W
Washington, D C. 20590

MAY - 5 2006

Mr. William Conway
Forest River
3010 College Avenue
Goshen, IN 46528

NVS-215bc
EQ06-007

Dear Mr. Conway:

The Office of Defects Investigation, Recall Management Division (RMD) is conducting a review of defect notice 06E-008. This notice affects K and S series Platform Wheelchair Lifts. The defect is in the weld joint of the vertical arm. The vertical arm is formed using 7-gage hot rolled steel. The Ricon Corporation (Ricon) has determined that the potential defect is the result of welds that did not achieve full penetration. Once the weld joint fails it appears that the lift becomes very difficult to stow which is very noticeable to the lift operator.

According to information provided by Ricon, Forest River was identified as a manufacturer whom purchased and/or was supplied vertical arm assemblies, and may have been notified by Ricon about the vertical arm assemblies. The purpose of this request is to ascertain the disposition of the vertical arm assemblies that were acquired by Ricon and to identify any subsequent purchaser of Forest River's products that may be motor vehicle manufacturers or whose products may have been supplied for inclusion in a new motor vehicle.

Federal Regulation 49 CFR Part 573, Defect and Noncompliance Reports, requires that a manufacturer of motor vehicles or replacement equipment furnish a report to the National Highway Traffic Safety Administration (NHTSA) about each defect in its products that it decides is related to motor vehicle safety or that fail to conform to a Federal Motor Vehicle Safety Standard. In the case of a defect or noncompliance decided to exist in original equipment installed in the vehicles of more than one manufacturer, compliance with Part 573.6 is required of the equipment manufacturer as to the equipment item, and of each vehicle manufacturer as to the vehicles in which the equipment has been installed. As of this date, we have not received notification of the above-described defect from Forest River.

If Forest River does not agree with the decision made by Ricon that the equipment contains a safety defect and could have been installed in Forest River products, please provide an explanation for Forest River's position. If Forest River has not received any of these equipment, please so state. If Forest River is not a vehicle manufacturer, please state the nature of its business and its relationship with Ricon. If Forest River resold any of the vertical arm assemblies to others, than please identify the purchaser by name, date, and quantity of Forest River's products that contain the Ricon equipment.

This letter is being sent to Forest River pursuant to 49 U.S.C. §30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. It constitutes a new request for information. Forest River's failure to respond promptly and fully to this letter could subject Forest River to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. If Forest River believes that it should file a Defect and Noncompliance Report, a guide is enclosed to assist you.

Forest River's response, in writing must be submitted to RMD by **May 16, 2006**, referencing EQ06-007, either by FAX, e-mail or any other method, which enables Forest River to verify promptly that it was in fact received by RMD and the date it was received.

If you have any questions, please contact Mrs. Barbara E. Cooke of my staff at (202) 366-6098, by FAX at (202) 366-7882, Bcooke@nhtsa.dot.gov.

Yours truly,

George H. Person,
Chief, Recall Management Division

Enclosures

RICON®

OE-008
(96 pgs)

January 23, 2006

National Highway Traffic Safety Admin.
Defects and Recall Information Analysis Division
400 7th Street SW
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report
Reference: ODI Investigation PE-06-003, Cracked Welds on Wheelchair Lift Vertical Support Arms

Gentlemen:

On January 20, 2006, Ricon Corporation decided that a defect which relates to motor vehicle safety 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 Responsibility and Reports.

This report was prepared on January 20, 2006

The full corporate name of the fabricating manufacturer is:

Ricon Corporation
7900 Nelson Road
Panorama City, CA 91402

The corporate officials that the agency should contact with respect to this recall are:

William Baldwin
President
wbaldwin@riconcorp.com
Ph. 818 267-3005
Fx. 818 267-3187

William Hinze
Vice President - Marketing
bhinze@riconcorp.com
Ph. 818 267-3012
Fx. 818 267-3139

Sincerely,

W.L Baldwin
President

Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report
Vertical Support Arms

I. Identify the Recalled Items of Equipment Involved in this Recall:

a. This recall applies to the "Vertical Support Arms" (Vertical Arms) that are used on Ricon's platform style wheelchair lifts. There are three different sizes (lengths) of vertical arms; one each for the "1200", "2000", and "5500" Series wheelchair lifts. Please refer to Appendix I for representations of these products.

b. There are two vertical arms on each lift. The vertical arms attach the platform section to the lifting frame section of the lift. The arms are "handed" (i.e. right or left side) on the "K" Series lifts, but they are not handed on the "S" Series lifts.

c. There are two generic and/or brand names for these platform lifts, which includes both FMVSS 403 Public Use and Private Use applications:

(1) "S" Series
(2) "K" Series

d. The model numbers for the "S" Series lifts are:

(1) S1200
(2) S1231
(3) S2005
(4) S2010
(5) S5505
(6) S5510

e. The model numbers for the "K" Series lifts are:

(1) K1200
(2) K2005
(3) K2010
(4) K5505
(5) K5510

II. Identify the Recall Population:

a. The recall includes FMVSS 403 compliant "S & K" Series platform style wheelchair lifts that were manufactured between June 12, 2005 and July 1, 2005 inclusive.

b. The FMVSS compliant platform lifts covered by this recall represent approximately 50% of Ricon's normal production in any given month. The other units include ramps and wheelchair lifts of different designs that do not incorporate the vertical arm. For the period June 12, 2005 to July 1, 2005 Ricon production was as follows:

(1) Total lifts/ramps produced by Ricon: 1,247 units (100%)

(2) "S" Series lifts produced: 422 units (34% of total units)

(3) "K" Series lifts produced: 166 units (13% of total units)

c. Total number of lifts potentially affected by the Recall is 588 units.

d. A breakdown of the affected lifts by model type and serial numbers is included as Appendix II.

e. Ricon estimates that the total number of vertical arms that actually are defective (i.e. less than full penetration weld) to be in the range of 3 – 5 % of the total population.

f. The recall population is based on Management's best estimate of the possible time frames involved. As described in more detail in the next section, the "defect" is the result of seam weld that did not achieve full penetration. This weld is done on a robotic welder using a controlled fixture. Ricon has two such robotic welders, which though similar in design, are not identical. Previously this weld was done on the "smaller" of the two robotic welders, but some time on or about June 12, 2005, an unknown number of vertical arms were welded on the "larger" robotic welder. Internal inspections identified the problem shortly thereafter, and the problem was corrected (introduction of weld process change) by July 1, 2005.

III. Describe the Defect:

a. The potential defect is in the weld joint of the vertical arm. The vertical arm is formed using 7-gage hot rolled steel. As shown in Figure 1, the top section of the arm is bent and welds are applied to both sides of the exterior portion of the arm. During the time in question the interior section of the arm was not welded (Figure 2). One of the subsequent corrective actions taken by Ricon was to weld the interior portion of the arm joint (Figure 3).

b. Ricon has determined that the potential defect is the result of welds that did not achieve full penetration. As noted in the previous section, this welding operation was typically done on Ricon's smaller robotic welder. At some point in time between June 12th and July 1st, welding operations for these items were transferred to Ricon's larger robotic welder. Though similar in design, the two robotic welders are not identical and therefore have slightly different characteristics. Our internal analysis found that there are differences between the power supplies for the two robots. There are parameters in the welding software related to current, frequency and duty cycles for a given weld. This is in addition to the position, speed of movement and wire feed rates. These parameters were not directly transferable between the two machines. This resulted in a weld that appears correct, but may lack sufficient penetration to achieve the design requirements.

c. The potentially defective arms were subsequently used in the production of finished lifts. Each lift is inspected at the time of assembly and is weight tested using the full rated load of the lift (either 600 or 800 pounds depending on the style lift).

d. Subsequent testing conducted at Ricon indicated that, when properly welded, the joint in question did not crack. Pull tests indicated that the base metal yielded prior to the weld.

e. Analysis of field failures and subsequent testing performed at Ricon indicated that welds are cracking during the "stow" phase of the lift cycle. This is when the unloaded lift is moved from the floor level of the vehicle to its stowed condition. Analysis of the dynamics shows that the weld joint is in compression when occupied, but in tension while being stowed. Ricon performed testing on lifts with one bad weld joint and further testing on a lift with two bad welds. To simulate a "bad" weld we actually eliminated the weld altogether, as shown in Figure 4. Hence the tests were conducted under a worst-case scenario. Under both sets of conditions the lifts were loaded with their rated load (800 pounds) and then 3 times the rated load (Figure 5). The tests showed that when loaded, the weld joint was in a compressive state and the lift moved from ground level to vehicle floor level without a problem (Figure 6). However, when the weight was removed and the lift was stowed,

the tests showed that the weld joint was in tension and the joint opened significantly (Figure 7).

f. Once the weld joint fails it appears that the lift becomes very difficult to stow (Figure 8), which is very noticeable to the lift operator. This is a result of twisting movement at the weld joint which causes the lift platform to shift to one side. This shifting makes it very difficult to stow the lift as a platform tends to strike the side of the bus (Figure 8). Likewise during the deployment phase, the platform will appear to be out of square and will strike the door opening (Figure 9). If the operator manages to get the lift to the vehicle floor level, the lift will appear to be out of adjustment with one side of the platform extending further out from the door opening. Under such conditions it would be very difficult, if not impossible to load a wheelchair on to the lift platform because the inner barrier (bridge plate) is so far out of adjustment. Because of the tensile load that occurs during the stow cycle, we believe that the problem is most likely to occur when the operator is attempting to stow an unloaded lift. Please note that other design features of the lift make it impossible to "stow" the lift if there is weight on the platform or inner barrier. From the testing conducted to date and from information provided from field reports, it is not clear how long before a defect prone lift will exhibit signs of cracking. We do know that the lifts were cycle tested and weight tested at Ricon prior to shipment. Although field reports have been sporadic, it appears that the cracks in the weld joint occur soon after the lift has been put into operation. We have reports of a very small number of lifts showing signs of cracking at the OEM's facilities (where they are installed in the buses), but for the most part the failures have been identified in the field after very limited operation.

g. The defect is not the result of a failed purchased component. Ricon is the manufacturer of the vertical arms in question.

IV. Chronology in Determining the Defect

Date	Event
6/12/05	Ricon begins production of vertical arms on 2d robotic welder.
6/15/05	Ricon Quality Assurance identifies problems with welds

7/01/05	Internal corrective actions / additional process steps added to weld internal seam
7/01/05	Internal testing to verify process changes (pull tests)
8/16/05	First notification from OEM of cracked welds
9/06/05	First notification from end user of cracked welds
1/05/06	Receipt of NHTSA ODI Resume
1/13/06	Additional laboratory testing at Ricon (simulating cracked welds)

V. Identify the Remedy:

a. The first step in the remedy process should be to alert the OEM's and their end users to the potential problem. As identified above, the "scope" is potentially 588 FMVSS compliant wheelchair lifts manufactured between June 12, 2005 and July1, 2005. This universe includes all FMVSS compliant "platform" style lifts manufactured during this period.

b. OEM notification shall include a technical description of the problem and a list, by serial number of the lifts in question. It will also provide instruction for inspection and/or remedy as outlined below (Appendix III)

c. In some cases (less than 20%), Ricon sold the product directly to a bus dealer or equipment installer (i.e. not an OEM). Here Ricon will notify the dealer directly with the same information outlined in V. (b) above.

d. Approximately 12% of the total lifts in question were sold to customers outside of the United States. Ricon will follow the same notification and remedy process with these foreign customers.

e. The notification process shall include instructions to identify the lift by serial number and to visually inspect the exterior weld joints on the lift. It will also include instructions to inspect these joints during the "stow" cycle, as this is when the problem is most visible (Figures 7,8). Instructions will also be provided to assist the operator in identifying symptoms and/or warnings that could occur prior to failure.

f. The owner/operator will be instructed to immediately pull the lift out of operation and notify Ricon's Customer Service department. Depending on location, the operator will be directed to an authorized Ricon Service Center where the repair operations will be completed. In this case the "repair" will be removal of the old arms and replacement with new vertical arms manufactured by Ricon. Alternatively, some end users are already qualified to replace the vertical arms. These customers will be instructed to contact Ricon's Customer Service department to coordinate the shipment of replacement vertical arms.

g. Ricon will provide two new replacement arms at no charge to the customer/end user. If one arm is to be replaced we believe that both arms should be replaced at one time. In addition to providing the material at no charge, Ricon will provide up to one (1) hour of labor reimbursement per lift in accordance with our published labor standards (Appendix IV). Reimbursement credit will be at Ricon's published rate of $ 62.00 per hour.

h. Ricon will provide a one-year parts and labor warranty on all replaced arms.

i. Sample recall documentation is provided in Appendix III.

j. The result of our internal investigation indicates that the root cause of the potential defect is failure to properly control a robotic welding process. Subsequent testing conducted at Ricon indicates that properly welded vertical arms, when subject to a tensile load that is several times the level that occurs during normal lift operation, the parent metal will yield at a proximate location before the joint in question exhibits signs of cracking. Accordingly, to prevent a recurrence of this problem, Ricon has implemented the following corrective actions:

(1) An improved welding process specific to each of the two machines.
(2) The addition of a manual weld along the inside joint.
(3) Increased in-process inspections and 100% inspection at final assembly.
(4) Verification through destructive testing to ensure design parameters are achieved.

VI. Recall Schedule:

a. Ricon proposes the following Recall Schedule. Please note that the "dates" are in days after NHTSA approval of final documentation (DAA):

Date	Action
10 DAA	Notify domestic (US) OEM's, providing recall instructions and list of serial numbers in question.
15 DAA	Notify domestic (US) Dealers, providing recall instructions and list of serial numbers in question.
30 DAA	Notify foreign (non US) customers (OEM's and/or Dealers) providing same information as above.
90 DAA	Report Quarterly results to NHTSA and OEM's (Q1)
180 DAA	Report Quarterly results (Q2)
270 DAA	Report Quarterly results (Q3)
360 DAA	Report Quarterly results (Q4)
450 DAA	Report Quarterly results (Q5)
540 DAA	Final Quarterly report

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Figure 9	Test Lift – Deploy Position (Floor Level)

Figure 3

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

MAY - 5 2006

Mr. Rob Froelich
Engineering
Glaval Bus A Division
914 County Road, #1
Elkhart, IN 46515

NVS-215bc
EQ06-007

Dear Mr. Froelich:

The Office of Defects Investigation, Recall Management Division (RMD) is conducting a review of defect notice 06E-008. This notice affects K and S series Platform Wheelchair Lifts. The defect is in the weld joint of the vertical arm. The vertical arm is formed using 7-gage hot rolled steel. The Ricon Corporation (Ricon) has determined that the potential defect is the result of welds that did not achieve full penetration. Once the weld joint fails it appears that the lift becomes very difficult to stow which is very noticeable to the lift operator.

According to information provided by Ricon, Glaval Bus A Division. (Glaval) was identified as a manufacturer whom purchased and/or was supplied vertical arm assemblies, and may have been notified by Ricon about the vertical arm assemblies. The purpose of this request is to ascertain the disposition of the vertical arm assemblies that were acquired by Ricon and to identify any subsequent purchaser of Glaval's products that may be motor vehicle manufacturers or whose products may have been supplied for inclusion in a new motor vehicle.

Federal Regulation 49 CFR Part 573, Defect and Noncompliance Reports, requires that a manufacturer of motor vehicles or replacement equipment furnish a report to the National Highway Traffic Safety Administration (NHTSA) about each defect in its products that it decides is related to motor vehicle safety or that fail to conform to a Federal Motor Vehicle Safety Standard. In the case of a defect or noncompliance decided to exist in original equipment installed in the vehicles of more than one manufacturer, compliance with Part 573.6 is required of the equipment manufacturer as to the equipment item, and of each vehicle manufacturer as to the vehicles in which the equipment has been installed. As of this date, we have not received notification of the above-described defect from Glaval.

If Glaval does not agree with the decision made by Ricon that the equipment contains a safety defect and could have been installed in Glaval products, please provide an explanation for Glaval's position. If Glaval has not received any of these equipment, please so state. If Glaval is not a vehicle manufacturer, please state the nature of its business and its relationship with Ricon. If Glaval resold any of the vertical arm assemblies to others, than please identify the purchaser by name, date, and quantity of Glaval's products that contain the Ricon equipment.

This letter is being sent to Glaval pursuant to 49 U.S.C. §30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. It constitutes a new request for information. Glaval's failure to respond promptly and fully to this letter could subject Glaval to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. If Glaval believes that it should file a Defect and Noncompliance Report, a guide is enclosed to assist you.

Glaval's response, in writing must be submitted to RMD by **May 16, 2006**, referencing EQ06-007, either by FAX, e-mail or any other method, which enables Glaval to verify promptly that it was in fact received by RMD and the date it was received.

If you have any questions, please contact Mrs. Barbara E. Cooke of my staff at (202) 366-6098, by FAX at (202) 366-7882, Bcooke@nhtsa.dot.gov.

Yours truly,

George H. Person,
Chief, Recall Management Division

Enclosures

RICON®

OE-008
(96 pgs)

January 23, 2006

National Highway Traffic Safety Admin.
Defects and Recall Information Analysis Division
400 7th Street SW
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report
Reference: ODI Investigation PE-06-003, Cracked Welds on Wheelchair Lift Vertical Support Arms

Gentlemen:

On January 20, 2006, Ricon Corporation decided that a defect which relates to motor vehicle safety 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 Responsibility and Reports.

This report was prepared on January 20, 2006

The full corporate name of the fabricating manufacturer is:

Ricon Corporation
7900 Nelson Road
Panorama City, CA 91402

The corporate officials that the agency should contact with respect to this recall are:

William Baldwin
President
wbaldwin@riconcorp.com
Ph. 818 267-3005
Fx. 818 267-3187

William Hinze
Vice President - Marketing
bhinze@riconcorp.com
Ph. 818 267-3012
Fx. 818 267-3139

Sincerely,

W.L. Baldwin
President

Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report
Vertical Support Arms

I. Identify the Recalled Items of Equipment Involved in this Recall:

a. This recall applies to the "Vertical Support Arms" (Vertical Arms) that are used on Ricon's platform style wheelchair lifts. There are three different sizes (lengths) of vertical arms; one each for the "1200", "2000", and "5500" Series wheelchair lifts. Please refer to Appendix I for representations of these products.

b. There are two vertical arms on each lift. The vertical arms attach the platform section to the lifting frame section of the lift. The arms are "handed" (i.e. right or left side) on the "K" Series lifts, but they are not handed on the "S" Series lifts.

c. There are two generic and/or brand names for these platform lifts, which includes both FMVSS 403 Public Use and Private Use applications:

(1) "S" Series
(2) "K" Series

d. The model numbers for the "S" Series lifts are:

(1) S1200
(2) S1231
(3) S2005
(4) S2010
(5) S5505
(6) S5510

e. The model numbers for the "K" Series lifts are:

(1) K1200
(2) K2005
(3) K2010
(4) K5505
(5) K5510

II. Identify the Recall Population:

a. The recall includes FMVSS 403 compliant "S & K" Series platform style wheelchair lifts that were manufactured between June 12, 2005 and July 1, 2005 inclusive.

b. The FMVSS compliant platform lifts covered by this recall represent approximately 50% of Ricon's normal production in any given month. The other units include ramps and wheelchair lifts of different designs that do not incorporate the vertical arm. For the period June 12, 2005 to July 1, 2005 Ricon production was as follows:

(1) Total lifts/ramps produced by Ricon: 1,247 units (100%)

(2) "S" Series lifts produced: 422 units (34% of total units)

(3) "K" Series lifts produced: 166 units (13% of total units)

c. Total number of lifts potentially affected by the Recall is 588 units.

d. A breakdown of the affected lifts by model type and serial numbers is included as Appendix II.

e. Ricon estimates that the total number of vertical arms that actually are defective (i.e. less than full penetration weld) to be in the range of 3 – 5 % of the total population.

f. The recall population is based on Management's best estimate of the possible time frames involved. As described in more detail in the next section, the "defect" is the result of seam weld that did not achieve full penetration. This weld is done on a robotic welder using a controlled fixture. Ricon has two such robotic welders, which though similar in design, are not identical. Previously this weld was done on the "smaller" of the two robotic welders, but some time on or about June 12, 2005, an unknown number of vertical arms were welded on the "larger" robotic welder. Internal inspections identified the problem shortly thereafter, and the problem was corrected (introduction of weld process change) by July 1, 2005.

III. Describe the Defect:

a. The potential defect is in the weld joint of the vertical arm. The vertical arm is formed using 7-gage hot rolled steel. As shown in Figure 1, the top section of the arm is bent and welds are applied to both sides of the exterior portion of the arm. During the time in question the interior section of the arm was not welded (Figure 2). One of the subsequent corrective actions taken by Ricon was to weld the interior portion of the arm joint (Figure 3).

b. Ricon has determined that the potential defect is the result of welds that did not achieve full penetration. As noted in the previous section, this welding operation was typically done on Ricon's smaller robotic welder. At some point in time between June 12th and July 1st, welding operations for these items were transferred to Ricon's larger robotic welder. Though similar in design, the two robotic welders are not identical and therefore have slightly different characteristics. Our internal analysis found that there are differences between the power supplies for the two robots. There are parameters in the welding software related to current, frequency and duty cycles for a given weld. This is in addition to the position, speed of movement and wire feed rates. These parameters were not directly transferable between the two machines. This resulted in a weld that appears correct, but may lack sufficient penetration to achieve the design requirements.

c. The potentially defective arms were subsequently used in the production of finished lifts. Each lift is inspected at the time of assembly and is weight tested using the full rated load of the lift (either 600 or 800 pounds depending on the style lift).

d. Subsequent testing conducted at Ricon indicated that, when properly welded, the joint in question did not crack. Pull tests indicated that the base metal yielded prior to the weld.

e. Analysis of field failures and subsequent testing performed at Ricon indicated that welds are cracking during the "stow" phase of the lift cycle. This is when the unloaded lift is moved from the floor level of the vehicle to its stowed condition. Analysis of the dynamics shows that the weld joint is in compression when occupied, but in tension while being stowed. Ricon performed testing on lifts with one bad weld joint and further testing on a lift with two bad welds. To simulate a "bad" weld we actually eliminated the weld altogether, as shown in Figure 4. Hence the tests were conducted under a worst-case scenario. Under both sets of conditions the lifts were loaded with their rated load (800 pounds) and then 3 times the rated load (Figure 5). The tests showed that when loaded, the weld joint was in a compressive state and the lift moved from ground level to vehicle floor level without a problem (Figure 6). However, when the weight was removed and the lift was stowed,

the tests showed that the weld joint was in tension and the joint opened significantly (Figure 7).

f. Once the weld joint fails it appears that the lift becomes very difficult to stow (Figure 8), which is very noticeable to the lift operator. This is a result of twisting movement at the weld joint which causes the lift platform to shift to one side. This shifting makes it very difficult to stow the lift as a platform tends to strike the side of the bus (Figure 8). Likewise during the deployment phase, the platform will appear to be out of square and will strike the door opening (Figure 9). If the operator manages to get the lift to the vehicle floor level, the lift will appear to be out of adjustment with one side of the platform extending further out from the door opening. Under such conditions it would be very difficult, if not impossible to load a wheelchair on to the lift platform because the inner barrier (bridge plate) is so far out of adjustment. Because of the tensile load that occurs during the stow cycle, we believe that the problem is most likely to occur when the operator is attempting to stow an unloaded lift. Please note that other design features of the lift make it impossible to "stow" the lift if there is weight on the platform or inner barrier. From the testing conducted to date and from information provided from field reports, it is not clear how long before a defect prone lift will exhibit signs of cracking. We do know that the lifts were cycle tested and weight tested at Ricon prior to shipment. Although field reports have been sporadic, it appears that the cracks in the weld joint occur soon after the lift has been put into operation. We have reports of a very small number of lifts showing signs of cracking at the OEM's facilities (where they are installed in the buses), but for the most part the failures have been identified in the field after very limited operation.

g. The defect is not the result of a failed purchased component. Ricon is the manufacturer of the vertical arms in question.

IV. Chronology in Determining the Defect

Date	Event
6/12/05	Ricon begins production of vertical arms on 2d robotic welder.
6/15/05	Ricon Quality Assurance identifies problems with welds

7/01/05	Internal corrective actions / additional process steps added to weld internal seam
7/01/05	Internal testing to verify process changes (pull tests)
8/16/05	First notification from OEM of cracked welds
9/06/05	First notification from end user of cracked welds
1/05/06	Receipt of NHTSA ODI Resume
1/13/06	Additional laboratory testing at Ricon (simulating cracked welds)

V. Identify the Remedy:

a. The first step in the remedy process should be to alert the OEM's and their end users to the potential problem. As identified above, the "scope" is potentially 588 FMVSS compliant wheelchair lifts manufactured between June 12, 2005 and July1, 2005. This universe includes all FMVSS compliant "platform" style lifts manufactured during this period.

b. OEM notification shall include a technical description of the problem and a list, by serial number of the lifts in question. It will also provide instruction for inspection and/or remedy as outlined below (Appendix III)

c. In some cases (less than 20%), Ricon sold the product directly to a bus dealer or equipment installer (i.e. not an OEM). Here Ricon will notify the dealer directly with the same information outlined in V. (b) above.

d. Approximately 12% of the total lifts in question were sold to customers outside of the United States. Ricon will follow the same notification and remedy process with these foreign customers.

e. The notification process shall include instructions to identify the lift by serial number and to visually inspect the exterior weld joints on the lift. It will also include instructions to inspect these joints during the "stow" cycle, as this is when the problem is most visible (Figures 7,8). Instructions will also be provided to assist the operator in identifying symptoms and/or warnings that could occur prior to failure.

f. The owner/operator will be instructed to immediately pull the lift out of operation and notify Ricon's Customer Service department. Depending on location, the operator will be directed to an authorized Ricon Service Center where the repair operations will be completed. In this case the "repair" will be removal of the old arms and replacement with new vertical arms manufactured by Ricon. Alternatively, some end users are already qualified to replace the vertical arms. These customers will be instructed to contact Ricon's Customer Service department to coordinate the shipment of replacement vertical arms.

g. Ricon will provide two new replacement arms at no charge to the customer/end user. If one arm is to be replaced we believe that both arms should be replaced at one time. In addition to providing the material at no charge, Ricon will provide up to one (1) hour of labor reimbursement per lift in accordance with our published labor standards (Appendix IV). Reimbursement credit will be at Ricon's published rate of $ 62.00 per hour.

h. Ricon will provide a one-year parts and labor warranty on all replaced arms.

i. Sample recall documentation is provided in Appendix III.

j. The result of our internal investigation indicates that the root cause of the potential defect is failure to properly control a robotic welding process. Subsequent testing conducted at Ricon indicates that properly welded vertical arms, when subject to a tensile load that is several times the level that occurs during normal lift operation, the parent metal will yield at a proximate location before the joint in question exhibits signs of cracking. Accordingly, to prevent a recurrence of this problem, Ricon has implemented the following corrective actions:

    (1) An improved welding process specific to each of the two machines.
    (2) The addition of a manual weld along the inside joint.
    (3) Increased in-process inspections and 100% inspection at final assembly.
    (4) Verification through destructive testing to ensure design parameters are achieved.

VI. Recall Schedule:

a. Ricon proposes the following Recall Schedule. Please note that the "dates" are in days after NHTSA approval of final documentation (DAA):

Date	Action
10 DAA	Notify domestic (US) OEM's, providing recall instructions and list of serial numbers in question.
15 DAA	Notify domestic (US) Dealers, providing recall instructions and list of serial numbers in question.
30 DAA	Notify foreign (non US) customers (OEM's and/or Dealers) providing same information as above.
90 DAA	Report Quarterly results to NHTSA and OEM's (Q1)
180 DAA	Report Quarterly results (Q2)
270 DAA	Report Quarterly results (Q3)
360 DAA	Report Quarterly results (Q4)
450 DAA	Report Quarterly results (Q5)
540 DAA	Final Quarterly report

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Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Responsibility and Reports[1]

On _____, 2006, _____ [MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. _____) exits 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 Responsibility and Reports.

Date this report was prepared: _____

Furnish the manufacturer's identification code for this recall (if applicable): _____

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.

_____

_____

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

_____

_____

Telephone Number: _____ **Fax No.:** _____

Name and Title of Person who prepared this report.

_____

_____

Signed:

_____

[1] Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210 or by FAX at (202) 366-7882.

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): ____________ Model Years Involved: ________Model(s): ____________________

Production Dates: Beginning: _______ Ending:

VIN Range: Beginning: __________________ Ending: _________________

Vehicle Type: _________ Bodystyle: ______________________________________

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

____

____

Make(s): ____________ Model Years Involved: ________Model(s): ____________________

Production Dates: Beginning: _______ Ending:

VIN Range: Beginning: __________________ Ending: _________________

Vehicle Type: _________ Bodystyle: ______________________________________

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

____

____

Make(s): ____________ Model Years Involved: ________Model(s): ____________________

Production Dates: Beginning: _______ Ending:

VIN Range: Beginning: __________________ Ending: _________________

Vehicle Type: _________ Bodystyle: ______________________________________

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

____

____

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.

II. Identify the Recall Population

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

Vehicles Model	Year	Number of Vehicles Potentially Involved

Total Number Potentially Affected by the Recall: _____

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

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:

III. Describe the Defect or Noncompliance

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.

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

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

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

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

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

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.

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. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

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

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.

VI. Identify the Recall Schedule

10. 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.

VII. Furnish Recall Communications

11. 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.***

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.