



U.S. Department
of Transportation

400 Seventh Street, SW
Washington, DC 20590

**National Highway
Traffic Safety
Administration**

March 5, 2007

ROB FROELICH
DESIGN ENGINEER
GLAVAL BUS DIVISION
914 COUNTY ROAD 1 NORTH
ELKHART IN 46514

NVS-215dgl
07V-072

Subject: WHEELCHAIR LIFTS/RICON/FMVSS 403

Dear MR. FROELICH:

This letter is to acknowledge your recent noncompliance information report. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

GLAVAL/APOLLO/2006
GLAVAL/TITAN/2006
GLAVAL/TITAN II/2006
GLAVAL/UNIVERSAL/2006

NHTSA Campaign Number: 07V-072

Mfg's Report Date: February 15, 2007

Components: EQUIPMENT ADAPTIVE

Potential Number of Units Affected: 75

Summary:

CERTAIN BUSES EQUIPPED WITH RICON PLATFORM STYLE WHEELCHAIR LIFTS FAIL TO COMPLY WITH THE REQUIREMENTS OF FEDERAL MOTOR VEHICLE SAFETY STANDARD NO. 403, "PLATFORM LIFT SYSTEMS FOR MOTOR VEHICLES." THE INNER BARRIER INTERLOCK SWITCH SYSTEM IN THE LIFT BASEPLATE MAY NOT DETECT THE PRESENCE OF A PASSENGER (EITHER WHEELCHAIR OR STANDEE) ON THE BARRIER AND CAN ALLOW THE PLATFORM TO MOVE DOWN MORE THAN ONE INCH BELOW FLOOR LEVEL WHEN OCCUPIED.

Consequence:

IN THE EVENT THIS CONDITION OCCURS DURING PASSENGER OPERATIONS, IT MAY BE POSSIBLE FOR THE WHEELCHAIR TO TIP BACKWARDS ONTO THE PLATFORM IF THE USER IS BACKING ONTO THE LIFT FROM INSIDE THE VEHICLE AND HAS THE SMALL FRONT WHEELS FULLY OR PARTIALLY ON THE INNER BARRIER WHEN THE PLATFORM WAS LOWERED. A PERSON STANDING COULD LOSE HIS OR HER BALANCE IF THEY WERE POSITIONED FULLY OR PARTLY ON THE INNER BARRIER WHEN THE PLATFORM WAS LOWERED. EITHER CONDITION COULD CAUSE PERSONAL INJURY.

Remedy:

GLAVAL BUS IS WORKING WITH RICON TO REPAIR THESE WHEELCHAIR LIFTS (PLEASE SEE 06E101). OWNERS CAN CONTACT RICON AT 800-322-2884 OR GLAVAL BUS AT 574-262-2212.

Notes:

CUSTOMERS MAY CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S VEHICLE SAFETY HOTLINE AT 1-888-327-4236 (TTY: 1-800-424-9153); OR GO TO [HTTP://WWW.SAFERCAR.GOV](http://www.safercar.gov).

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

We have reviewed your proposed owner letter and it does not meet the requirements of Part 577.

The first paragraph should read: "Glaval Bus in conjunction with Ricon Corporation has decided that certain 2006 model year Universal, Titan, Apollo, and Titan II buses equipped with Ricon wheelchair lifts fail to conform to the requirements of Federal Motor Vehicle Safety Standard No. 403, "Platform Lift Systems for Motor Vehicles."

Even though you have been advised by Ricon that an end user may perform the lift test, an end user is not qualified to do a compliance test. Ricon technicians are the only ones who can certify these wheelchair lifts. You need to remove the section of this letter where you are asking your owners to inspect their vehicle.

You also need to remove the last sentence of the first page. Ricon can not state how much labor they will pay to correct this noncompliance.

The reimbursement rule became effective on January 15, 2003. Accordingly, following that date, a statement needs to be added to the owner letter concerning reimbursement for prior repairs, i.e., "If you had this repair performed before you received this letter, you may be eligible to receive reimbursement for the cost of obtaining a pre-notification remedy of the problem associated with this recall. For more information contact Ricon Customer Support at 1-800-322-2884 or Glaval Bus at 1-574-262-2212."

A sentence should be added concerning leased vehicles, i.e., Federal regulations require that any vehicle lessor receiving this recall notice must forward a copy of this notice to the lessee within ten days.

Please change the agency's information to read: Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, SW., Washington, DC 20590; or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>.

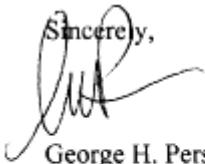
Please provide the following additional information and be reminded of the following requirements:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in your report, Ricon will be handling the remedy and quarterly reporting for this campaign. However, please be advised that 49 CFR 573.6 provides that the vehicle manufacturer is responsible for any safety related defect or any noncompliance in the vehicle or any item of original equipment. If Ricon's campaign is not satisfactory, you may be required to conduct a follow-up notification.

Your contacts for this recall will be Pat Wallace or Delia Lopez, who may be reached by phone at 202-366-5232 or 202-366-9525 or by email at patricia.wallace@dot.gov or delia.lopez@dot.gov. We look forward to working with you for successful completion of this recall campaign.

Sincerely,



George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement