

February 7, 2007

VIA E-MAIL - RECEIPT CONFIRMATION REQUESTED

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

07V-046
(7 pages)

Re: Eldorado National - Kansas
Defect and Non-Compliance Report

Dear Mr. Person:

Eldorado National – Kansas (“Eldorado National”) has been notified by Ricon concerning a safety non-compliance with FMVSS 403 involving wheel chair lift products built between January 6, 2006 and September 6, 2006 inclusive. Ricon has already initiated a safety recall campaign with respect to this non-compliance. NHTSA has assigned recall number 06E-101 to the Ricon recall campaign.

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 Eldorado National were built with Ricon wheel chair lifts that contain the non-compliance.

As more specifically set forth below, Ricon has agreed to conduct the recall campaign involving these non-compliant wheel chair lifts. Eldorado National will provide Ricon with a list of dealers and owners to assist Ricon in remedying the non-compliance. Ricon will be filing the quarterly reports in connection with the recall campaign.

- A. Recall Population and Vehicle Identification. The non-compliant wheel chair lifts supplied by Ricon have been used on certain 2006 and 2007 Aerolite, Aerotech and Aero Elite Buses, which were manufactured by Eldorado National between January and September of 2006. The total number of buses subject to this recall campaign is 315.
- B. Description of Defect. The potential non-compliance with S6.10.2.7 of the FMVSS403 is the result of the inner barrier interlock switch system in the lift base plate not detecting the presence of a passenger (either wheelchair or standee) in the inner barrier and allowing the platform to move down more that one inch below floor level while occupied. This condition can result at installation if the installer runs wires through the base plate assembly and the wires lodge under the trigger block for the interlock switch interfering with the switch movement. 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

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OFFICE OF DEFECTS
INVESTIGATION/RMD

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 standee 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. No accidents have been reported as a result of this condition to date.

- C. Basis for Determining that a Defect Exists. Eldorado National received notification from Ricon on January 31, 2007 that the non-compliance with the wheel chair lifts exist.
- D. Remedying of Defect. As set forth in the notification issued by Ricon in connection with recall campaign 06E-101, Ricon will correct the wheel chair lift if found to be non-compliant. The owners of the buses subject to this recall campaign will be advised to contact Ricon in order to make arrangements to have the remedy completed by Ricon. Ricon will implement the recall campaign in accordance with the procedures specified in recall campaign 06E-101. Ricon has agreed to remedy the defect without charge to the owners.
- E. Owner Notifications. Eldorado will notify the owner's of the buses. A copy of the owner's notification letter is attached for review and approval.
- F. Quarterly Reporting Requirements. Ricon will be responsible for filing quarterly reports in connection with recall campaign 06E-101. Because the information included by Ricon in its quarterly reports will encompass the remedying of the Eldorado National buses subject to this recall campaign, Eldorado National will not file quarterly reports to avoid duplication.
- G. Campaign Number. Eldorado National does not have an internal campaign number for this recall. Eldorado National will use the recall campaign number assigned by NHTSA.

The enclosed information should comply with the NHTSA regulations and satisfy the obligations of Eldorado National with respect to this recall campaign. If you need any additional information regarding the participation of Eldorado National in this recall campaign, please feel free to contact me at 937-596-6849, Ext. 7363.

Sincerely,



David M. Mihalick
Thor Industries
Standards Compliance Manager



February 9th, 2007

SENT VIA CERTIFIED MAIL

RE: SAFETY RECALL NOTICE – NHTSA RECALL

Dear

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. Ricon Corporation has decided that a defect, which relates to the motor vehicle safety, exists in certain platform wheelchair lifts. The attached letter will explain the nature of the potential defect, how to identify the defect and what Ricon Corporation will do to remedy of the defect.

Ricon Corporation has identified the following lift(s).

ENC (last 5digits) Chassis VIN (last 8) Lift S/N Shipment Date

If you have any questions concerning this recall campaign or need assistance concerning the scheduling of the remedy, please contact the Ricon Customer Support Department at 800-322-2884 or Bernie Regnier at Eldorado National at 785-827-1033 ext. 412. We are sorry for this inconvenience; however Ricon Corporation has taken this action in the interest of your safety and the continued satisfaction with our buses.

Sincerely,
Eldorado National – Kansas

Bernie Regnier
Product Support Manager

CC: B. Hinze – Ricon Corporation
 D. Mihalick – THOR Industries
 M. Alexander – THOR Industries
 A. Imanse – THOR Industries
 S. Walle -- Eldorado National - Kansas



RE: Safety Standard Non-Compliance Recall Notification (# 06E101000)

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

Dear Mr.

Ricon Corp. has determined that a safety related non-compliance with S6.10.2.7 of the FMVSS 403 (Inner Barrier Interlock) exists in certain "DOT Public Use" wheelchair lifts **manufactured** between January 6,2006 and September 6,2006.

WHY ARE WE CONDUCTING THIS RECALL:

The potential non-compliance is the result of the inner barrier interlock switch system in **the lift baseplate** not detecting the presence of a passenger (either wheelchair or standee) on the **barrier and** allowing the platform to move down more than one inch below floor level when occupied. This condition can result during installation if the installer runs wires through the **baseplate assembly** and the wires lodge under the trigger block of the interlock interfering with the **switch** movement. 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 standee** could lose his or her balance if they were positioned **fully or partly on the inner bamer** when the platform was lowered. Either condition could cause **personal injury**.

WHAT YOU AS THE OWNER SHOULD DO:

Ricon **has** enclosed a list of lifts you purchased that were manufactured during the specified **time period**. You should follow the procedures outlined below to determine if your lift(s) **need** adjustment or modifications:

Ricon Corporation
100 Wilson Road, Paramus, NY 10765
Tel: 833-367-3000 • Toll-free: 800-322-2884 • Fax: 812-266-1111
www.RiconCorp.com • Email: sales@RiconCorp.com



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1. **Park** the vehicle in a safe location and operate the **lift** through the **unfold/deploy** cycle.
2. With the lift at the vehicle floor level, place a 25 pound weight completely on any part of the inner barrier, (yellow painted plate) and push the down switch.
3. If **the** lift platform goes down one inch or less and then stops all movement, the **lift** does not require adjustment or modification and may be returned to **normal** service.
4. **If the platform continues to move downward, the operator should take the following steps:**
 - a. Remove the 25-pound weight, return the lift to the stowed position and turn power off 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 for guidance on how to correct the non-compliance.
 - d. DO NOT USE THE LIFT again until a factory-trained technician has corrected the non-compliant condition.

WHAT RICON CORPORATION WILL DO:

Upon notification from **you**, Ricon will work with you to locate and correct the **source of interference** or other problem with the inner barrier interlock switch as quickly as possible. If **you are already** factory trained to **perform** service on Ricon lifts, the repairs can be **done at your location**. If you are not factory trained to service Ricon **lifts**, 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**.

Lift repairs may include removal **and/or** re-routing any **added** wire running through the **baseplate**, adjustment of the inner **barrier** interface with the baseplate or replacement of the switch **block** assembly. We will provide all the necessary adjustment instructions **and/or** replacement **parts** **Free of Charge**. If the repairs are done by you, Ricon will pay one-hour labor at \$62.00,

If the **lift** is inspected **and/or** 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.



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Page 3 – Owner Recall (#06E10100)

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

Associate Administrator for Enforcement
National Highway Traffic Safety Administration (NVS-200)
400 Seventh Street, S W
Washington, D. C. 20590
Phone (888) 327-4236
(D.C. residents only – 202-366-0123)
or go to www.safercar.gov

We have attached a “**Inspection/Repair Log**” listing the serial number of the lifts you own. **Please return** a copy of the completed Log indicating the inspection **and/or** repairs were **completed** to the address listed below. You may also fax the form to 818-267-3139 if **more** convenience.

Thank you for you prompt attention to this matter. **If** you have any questions concerning these **procedures** please contact the undersigned at (818) 267-3012 or by **email** at BHinze@RiconCorp.com.

Sincerely,

Bill Hinze
Vice President
Ricon Corp.

Enclosure

Ricon Corp. 11/09
2000 National Blvd., Torrance City, California 90503
Tel: 818-267-3000 • Fax: Free 800-327-2828 • Tel: 818-267-3001
www.RiconCorp.com • e-mail: sales@RiconCorp.com

