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2007 MAR 23 A 9:22

OFFICE OF DEFECTS  
11/17/07

07V-135  
(5 pages)

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Director  
Government Technical Affairs

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March 15, 2007

Dan Smith  
Associate Administrator for Vehicle Safety  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

**Re: Defect Information Report FL-492, Ricon Wheel Chair Lift Noncompliance**

Mr. Smith:

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Freightliner LLC herewith reports a campaign to recall approximately 700 Thomas Built Bus school buses found to have a noncompliance in the operation of the Ricon wheel chair lift.

Attached is Freightliner's Defect Information Report.

Please contact me if you have any questions.

Sincerely yours,

  
Nasser Zamani

Cc: Michael Mason, CAL-OSHA  
Enclosure  
Certified Mail#70023150000414054561

**Noncompliance Information Report**  
(Section 573.6)

March 15, 2007

(c)(1) **Manufacturer:** Freightliner LLC  
P.O. BOX 3849  
Portland, Oregon 97208  
(503) 745-5219

**Brands:** Thomas Built Buses

(c)(2) **Vehicles identification:**

**Model(s) affected:** Minotour, FS-65, C2, HDX, EF School Buses

**Model Years affected:** 2006, 2007

**Manufacture Dates:** January 6, 2006 through September 6, 2006

**Basis for determining population:** Buses built with Ricon wheel chair lift models S2003, S2005, S2010, S5503, S5505, S5510, K2003, K2005, K2010, K5503, K5505, K5510

**Component manufacturer if other than the vehicle manufacturer:**

Ricon Corporation

7900 Nelson Road

Panorama City, CA 91402

William Hinze, Vice President - Marketing, 818-267-3012

(c)(3) **Total number of vehicles potentially affected:** approximately 700

(c)(4) **Percentage of vehicles estimated to contain the defect:** 2%

(c)(5) **Description of the defect:** See attached Noncompliance report from Ricon; Ref FMVSS 403.  
**49CFR Section 577.5(f) Evaluation of the risk to motor vehicle safety:** The platform standee or wheel chair maybe momentarily lifted off balance by the roll stop as it rotates into position, resulting in possible injury. There have no reported incidences or injuries. See attached Noncompliance report from Ricon; Ref FMVSS 403.

(c)(6) **Chronology of principal events:** NHTSA discovered the issue during a routine compliance evaluation of various lifts in 2006 and notified Ricon. Thomas Built Bus received a letter of potential noncompliance from Ricon Corporation on Feb 1, 2007. See attached Noncompliance Report from Ricon; Ref FMVSS 403.

(c)(7) **Noncompliance-test or other data:** See attached Noncompliance report from Ricon; Ref FMVSS 403.

(c)(8) **Remedial program:** The lifts will be tested by Ricon trained technicians. Those that do not meet the requirements will be put out of service until they can be repaired. Repairs will be performed by Thomas Bus Dealerships and Direct Warranty customers approved by Ricon to service the lifts or by the nearest Ricon service center.

**Estimated Owner Notification Date:** Customer notification will be by first class mail using Freightliner records to determine the customers affected. This will be completed approximately April 30, 2007

**Reimbursement Plan:** Copies will be submitted as a supplemental report when available.

(c) (9) **Communications sent to dealers and owners:** Copies will be submitted as a supplemental report when available.

(c) (10) **Copy of proposed owner notification letter:** A draft will be sent for ODI review when available.

(c) (11) **Manufacturer's campaign number:** FL-492



INNOVATION IN ACCESS

06E-101 - Amended  
(3 pages)

December 27, 2006

Associate Administrator for Safety Assurance (NSA-01)  
National Highway Traffic Safety Administration  
400 7<sup>th</sup> Street SW  
Washington D.C. 20590

DEC 27 11 40  
REGISTRATION

Subject: Part 573 Defect and Noncompliance Responsibility Report  
Reference: FMVSS 403 Compliance Testing of Ricon K-series Public Use Lift

Ref: Recall #06E101000

Dear Sir:

On December 19, 2006, Ricon Corporation decided that a noncompliance with Federal Motor Vehicle Safety Standard 403 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 Reports.

This report was prepared on December 22, 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](mailto:wbaldwin@riconcorp.com)  
Ph. 818 267-3005  
Fax. 818 267-3187

William Hinze  
Vice President - Marketing  
[bhinze@riconcorp.com](mailto:bhinze@riconcorp.com)  
Ph. 818 267-3012  
Fax. 818 267-3139

Sincerely,

W.L. Baldwin  
President



INNOVATION IN ACCESS

**Ricon Corporation**  
**Part 573 Defect and Noncompliance Responsibility Report**  
**Occupancy of Inner roll stop interlock (S6.10.2.7)**

**1. Identify the Items of Equipment Involved in this Recall:**

a. This recall applies to the Inboard roll stop that is used on Ricon's platform style wheelchair lifts. There are three different sizes (widths) of inboard roll stops; 30", 32" and 34".

b. There are two Model names for these platform lifts, which includes both FMVSS 403 Public Use applications:

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

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

S2003  
S2005  
S2010  
S5503  
S5505  
S5510

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

K2003  
K2005  
K2010  
K5503  
K5505  
K5510



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2. **Identify the Recall Population:** Lifts manufactured between January 6, 2006 and September 6, 2006 inclusive. (See attached lists)

3. **Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 1-2%

4. **Describe the noncompliance:** The inboard rollstop interlock may not detect the presence of a "wheelchair test device" when tested in accordance with S7.6 of FMVSS 403.

**Describe the cause(s) of the noncompliance:** Current information indicates there may be an installation problem where a wire has been improperly routed through the base plate and is interfering with the operation of the inboard rollstop switch.

**Describe the consequence(s) of the noncompliance:** The lift may deploy downward from the vehicle floor level, not detecting the presence of a wheelchair or standee occupant.

**Identify any warning which can (a) precede or (b) occur:** Wheelchair occupant will feel his/her wheelchair moving upward causing occupant to begin to tilt backward.

5. **Not applicable**

6. **Chronology of tests that determined the noncompliance:** Compliance testing conducted by MGA Research Corporation on July 7, 2006. Additional testing at Ricon Corp was conducted on November 17, 2006.

7. **Identify the Remedy:** Contact Ricon Customer Support for guidance on correcting the non-compliance.

8. **Recall Schedule:** Notification to customers beginning February 1, 2007

9. **Furnish Recall Communications:** Attached for NHTSA review and approval.