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

SEP 9 - 2008

1200 New Jersey Avenue SE
Washington, DC 20590

MR. NASSER ZAMANI
MANAGER, COMPLIANCE AND
REGULATORY AFFAIRS
DAIMLER TRUCKS NORTH AMERICA
4747 N. CHANNEL AVENUE
PORTLAND OR 97217-3849

NVS-215kjs
08V-432

SUBJECT: FMVSS 404/ANTI-STOW INTERLOCK/RICON

DEAR MR. ZAMANI:

This letter serves to acknowledge Daimler Trucks North America's notification to the National Highway Traffic Safety Administration (NHTSA) of a noncompliance with Federal Motor Vehicle Safety Standard No. 404, "Platform Lift Installations in Motor Vehicles," in the vehicles listed below for which a safety recall campaign shall be conducted pursuant to 49 U.S.C. § 30119.

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:
FCCC/FS65/2006-2007
THOMAS/MVP EF/2006-2007
THOMAS BUILT BUSES/C2/2006-2007
THOMAS BUILT BUSES/HDX/2006-2007
THOMAS BUILT BUSES/MINOTOUR/2006-2007

NHTSA Campaign Number: 08V-432 **Mfg's Report Date:** August 18, 2008

Components: EQUIPMENT ADAPTIVE

Potential Number of Units Affected: 2,250

Summary:
DAIMLER TRUCKS IS RECALLING 2,250 MY 2006 AND 2007 THOMAS BUILT MINOTOUR, FS65, C2, HDX, AND MVP EF SCHOOL BUSES AND RECREATIONAL VEHICLE CHASSIS MANUFACTURED BETWEEN MARCH 9, 2005 AND FEBRUARY 23, 2007, EQUIPPED WITH RICON S OR K SERIES

WHEELCHAIR LIFTS. THE ANTI-STOW INTERLOCK MAY NOT DETECT THE PRESENCE OF A WHEELCHAIR OR MOBILITY AID USER. THE PRESSURE SENSING SWITCH THAT DETECTS THE PRESENCE OF WEIGHT ON THE PLATFORM WAS NOT ADJUSTED TO THE NECESSARY SENSITIVITY LEVEL. THE LIFT COULD STOW EVEN THOUGH SOMEONE OR SOMETHING IS STILL ON THE LIFT WHICH FAILS TO COMPLY WITH FEDERAL MOTOR VEHICLE SAFETY STANDARD NO. 404, "PLATFORM LIFT INSTALLATIONS IN MOTOR VEHICLES."

Consequence:
A LIFT OCCUPANT CAN BE INJURED SHOULD THE LIFT BEGIN TO STOW UNINTENTIONALLY.

Remedy:
DAIMLER TRUCKS IS WORKING WITH RICON TO CORRECT THE WHEELCHAIR LIFTS (PLEASE SEE 07E097). THE RECALL IS EXPECTED TO BEGIN DURING SEPTEMBER 2008. OWNERS MAY CONTACT RICON AT 1-800-322-2884 OR THOMAS BUILT AT 1-336-889-4871.

Notes:
DAIMLER TRUCKS' RECALL NO. FL-537. 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.

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.

The information in your noncompliance report appears to satisfy the requirements of 49 CFR 573.6 except for the following items:

> You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, 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 Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on or before 30 days after the close of the calendar quarter.

Your contact for this recall will be Kelly Schuler, who may be reached by phone at 202-366-5227, by email at Kelly.Schuler@dot.gov, or through the office email at RMD.ODI@dot.gov. We look forward to working with you for the successful completion of this recall campaign.

Sincerely,

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