



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

1200 New Jersey Avenue SE  
Washington, DC 20590

*December 8, 2008*

MS. GERI BROWN  
VICE PRESIDENT  
MOBILITY TRANSPORTATION SERVICES  
42000 KOPPERNICK #A3  
CANTON MI 48187

NVS-215dgl  
08V-637

SUBJECT: FMVSS 403/ANTI-STOW INTERLOCK/RICON

DEAR MS. BROWN:

This letter serves to acknowledge Mobility Transportation Services' (MTS) notification to the National Highway Traffic Safety Administration (NHTSA) of a safety noncompliance with Federal Motor Vehicle Safety Standard No. 403, "Platform Lift System Accessible for Motor Vehicles," in the products described 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:**

MTS/E11/2006-2007

MTS/S24/2006-2007

MTS/S31/2006-2007

**NHTSA Campaign Number:** 08V-637

**Mfg's Report Date:** November 21, 2008

**Components:** EQUIPMENT ADAPTIVE

**Potential Number of Units Affected:** 9

**Summary:**

MOBILITY IS RECALLING 9 MY 2006-2007 E11, S24 AND S31 VANS BUILT ON FORD CHASSIS AND EQUIPPED WITH RICON PLATFORM STYLE WHEELCHAIR LIFTS. THESE LIFTS FAIL TO COMPLY WITH THE REQUIREMENTS OF FEDERAL MOTOR VEHICLE SAFETY STANDARD NO. 403, "PLATFORM LIFT SYSTEM ACCESSIBLE FOR MOTOR VEHICLES." 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.

**Consequence:**

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

**Remedy:**

MTS IS WORKING WITH RICON TO CORRECT THE WHEELCHAIR LIFTS FREE OF CHARGE (PLEASE SEE 07E097). OWNERS MAY CONTACT RICON AT 1-818-267-3000 OR MTS AT 1-734-453-6452.

**Notes:**

MTS RECALL NO. RICON 001. CUSTOMERS MAY ALSO 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).

This recall was the subject of an Equipment Query, EQ08-011, conducted by the Office of Defects Investigation.

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.

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

The second paragraph should read: "Mobility Transportation Services has decided that certain model year 2006-2007 E11, S24, and S31 vans built on Ford chassis and equipped with Ricon platform style wheelchair lifts fail to conform to Federal Motor Vehicle Safety Standard No. 403, "Platform Lift System Accessible for Motor Vehicles."

A sentence needs to 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 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).

You are required to provide an estimated date including month, day, and year, when you will send notifications to owners, dealers, and distributors as soon as it becomes available.

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](mailto:Patricia.wallace@dot.gov), [Delia.lopez@dot.gov](mailto:Delia.lopez@dot.gov), or through the office email at [RMD.ODI@dot.gov](mailto:RMD.ODI@dot.gov). We look forward to working with you for successful completion of this recall campaign.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Person', written in a cursive style.

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