

DAIMLER

Daimler Trucks North America
Nasser Zamani
Manager
Compliance and Regulatory Affairs

August 19, 2008

Dan Smith
Associate Administrator for Vehicle Safety
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington D.C. 20590

**Re: Defect Information Report – Supplemental Report No. 1
FL536, Ricon Wheelchair Lift 07E-095**

Mr. Smith

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Daimler Trucks North America LLC herewith submits supplemental defect information to amend its original Defect Information Report. The attached Defect Information Report from Ricon Corporation was omitted from its original Defect Information Report.

Please contact me if you have any questions.

Sincerely yours,



Nasser Zamani

Cc: Michael Mason, CAL-OSHA
Certified Mail# 7004 2890 0004 1202 0713



Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

**07E-095
(8 pages)**

November 2, 2007

RECEIVED
2007 NOVEMBER 7 9:00A
DEFECTS INVESTIGATION
RECALL MGMT DIV.

Mr. Dan Smith
Associate Administrator for Enforcement
NHTSA - 215
1200 New Jersey Ave., SE
Washington D.C. 20590

Subject: Part 573 Defect and Noncompliance Responsibility Report – Threshold Warning System
Reference: FMVSS 403 compliant S & K-series Public and Private Use Lifts

Dear Sir:

On November 1, 2007, Ricon Corporation determined 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 November 2, 2007

1. The full corporate name of the fabricating manufacturer is:

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

The corporate officials that the agency should contact with respect to this recall are:

Stanton Saucier
General Manager
ssaucier@wabtec.com
Phone 818 267-3016
Fax 818 267-3187

William Hinze
Director - Marketing
bhinze@wabtec.com
Phone 818 267-3012
Fax 818 267-3139

Sincerely,

William Hinze
Director of Marketing



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Ricon Corporation
Part 573 Defect and Noncompliance Responsibility Report
Threshold warning signal – (S6.10.2.3)

I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall:

- a. This recall applies to the Threshold Warning System that is used on Ricon’s platform style wheelchair lifts.
- b. There are two Model names for these platform lifts, which includes FMVSS 403 Public Use and Private Use applications:

- (1) “S” Series
- (2) “K” Series

- c. The model numbers for the “S” Series lifts are:

S1200
S2003
S2005
S2010
S5503
S5505
S5510

- d. The model numbers for the “K” Series lifts are:

K1200
K2003
K2005
K2010
K5503
K5505
K5510



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II. Identify the Recall Population

- 3. Identify the Recall Population:** Lifts manufactured between April 1, 2005 and October 9, 2007 inclusive.
- 4. Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 100%

III. Describe the Defect or Noncompliance

- 5. Describe the noncompliance:** The Threshold Warning System may not detect the presence of a "wheelchair test device" when tested in accordance with S7.4 of the FMVSS 403.

Describe the cause(s) of the noncompliance: Results from misinterpretation of the testing parameters.

Describe the consequence(s) of the noncompliance: The threshold warning signal may not activate when a certain point on the threshold area is encroached.

Identify any warning which can (a) precede or (b) occur: With the lift platform one inch or more below vehicle floor level, the Threshold Warning System will activate when a wheelchair or individual using a mobility aid enters the designated Threshold area but may deactivate if the wheelchair or mobility aid user continues to move toward a certain point on the threshold area.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address. N/A

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

- 6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.** N/A



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7. **With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.**

NHTSA Compliance Test Report # 638657A and NHTSA -2007-28140 Notice 1 formed the basis for Ricon Corporation's determination of noncompliance. There have been no claims, accidents, injuries or fatalities associated with this noncompliance.

V. Identify the Remedy

8. **Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.**

Replacement of the Threshold Warning System metal covers and optical sensor mounting retainers will correct the noncompliance. Ricon will provide a kit for field replacement at no charge.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The Replacement parts can be distinguished from the recall components by the location of the openings in the cover where the optical sensors are located. The remedy components will have openings spaced 5.25 inches apart while recall components will have openings spaced 7 inches apart.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The recall condition was corrected in production on all lifts manufactured after October 9, 2007.

VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailer, and purchasers. Please identify any foreseeable problems with implementing the recall.



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Ricon Corporation anticipates the recall campaign will begin in December 31, 2007. At that time, manufacturers and dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population.

VII. Furnish Recall Communications

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



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December 31, 2007

Recall Manager
ABC Corporation
123 Main Street
Anytown, USA

RE: Equipment Safety Standard Non-Compliance Notification (#07EXXXXXX)

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

Dear Recall Manager,

Ricon Corp. needs your assistance in notifying your customers about a recall of certain wheelchair lift products built between April 1, 2005 and October 9, 2007 inclusive. Ricon Corporation has determined that a safety related noncompliance with S6.1 of the FMVSS 403 exists in public and private use wheelchair lifts manufactured by Ricon on the above dates.

WHAT IS BEING RECALLED:

This recall process applies to the "Threshold Warning System" only on Ricon's "1200, 2000 and 5500" series platform lifts labeled for "DOT Public Use" and "DOT Private Use". It does not apply to other Ricon products.

WHY IS IT BEING RECALLED:

The non-compliance with S6.1 of the FMVSS 403 is the result of the Threshold Warning System not detecting the presence of a wheelchair or mobility aid user in a certain spot within the defined threshold area. In the event this condition occurs during passenger operations the wheelchair or mobility aid user may move toward the vehicle lift door when the lift platform is below floor level. This situation could cause personal injury.



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NHTSA – non-compliance notification
Page 2

WHAT YOU AS THE OEM/INSTALLER NEED TO DO:

Ricon has enclosed a complete list of the lifts you purchased that were manufactured during the specified time period. This information will help you identify your end-user customers and provide the following instructions to them:

- 1. Park the vehicle in a safe location.**
- 2. Locate and remove 2 bolts at the bottom of the Threshold Warning System (TWS) covers on the inboard surfaces of the right and left side baseplate towers.**
- 3. Slide the covers up to remove top cover clips from towers.**
- 4. Remove optical sensors and retainer clips from inside the two cover assemblies.**
- 5. Reinstall sensors into new TWS covers with new retainer clips provided.**
- 6. Slide new covers over towers and reinstall the 2 bolts at the bottom of the towers.**
- 7. Discard original parts.**

WHAT RICON CORPORATION WILL DO:

Upon notification from your end-user customer, Ricon will work with them to obtain the necessary parts and make the retrofit. If the end-user is already factory trained to perform this service, the retrofit can be done at the end-user's location. If the end-user is not factory trained to perform this service, we will arrange for the retrofit to be done at the nearest Ricon authorized service center/dealer. The lift retrofit will include removal and replacement of the TWS covers using TWS retrofit kit # 00002. We will provide all the necessary replacement parts at No Charge and will pay labor of \$37.50 for each retrofit.

If the lift is retrofitted 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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NHTSA – noncompliance notification

Page 3

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
1200 New Jersey Ave., SE
Washington, D. C. 20590
Phone (888) 327-4236**

Ricon Corp. will take responsibility for compiling and submitting required “Quarterly Reports” to NHTSA covering end-user retrofits upon receipt of the customer (end-user) contact information from each OEM/Dealer.

Thank you for your 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@Wabtec.com.

Sincerely,

A handwritten signature in black ink that reads "Bill Hinze". The signature is written in a cursive, slightly slanted style.

**Bill Hinze
Director of Marketing
Ricon Corp.**