

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On July 14, 2008, Coach & Equipment Manufacturing Corp. [MFR] decided that ~~(a defect which relates to motor vehicle safety)~~ (a noncompliance with Federal Motor Vehicle Safety Standard No. 403) exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: September 12, 2008

Furnish the manufacturer's identification code for this recall (if applicable): EQ 08-011

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Coach & Equipment Manufacturing Corp.

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

BRYAN D. HICKMAN
President

Telephone Number: (315) 279-1214 Fax No.: (315) 536-0460

Name and Title of Person who prepared this report.
Bryan Hickman
President

Signed:

Bryan D Hickman

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2008 SEP 16 10:35 AM
DEFECTS INVESTIGATION
RECALL MGMT DIV.

¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Coach & Equipment
Make(s): Coach & Equipment Model Years Involved: 2005, 2006 Model(s): Phoenix

Production Dates: Beginning: 4/1/2005 Ending: 12/31/2006

VIN Range: Beginning: N/A Ending: _____

Vehicle Type: Ford chassis Bodystyle: Paratransit Bus

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

We recalled those buses equipped with Ricon S-series and K-series wheel chair lifts manufactured by Ricon Corporation between April 1, 2005 and September 6, 2006 (Ricon recall OTE-097)

Make(s): _____ Model Years Involved: _____ Model(s): _____

Production Dates: Beginning: _____ Ending: _____

VIN Range: Beginning: _____ Ending: _____

Vehicle Type: _____ Bodystyle: _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): _____ Model Years Involved: _____ Model(s): _____

Production Dates: Beginning: _____ Ending: _____

VIN Range: Beginning: _____ Ending: _____

Vehicle Type: _____ Bodystyle: _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles manufactured during that time period.

20%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
Phoenix	2005	} 335
Phoenix	2006	

Total Number Potentially Affected by the Recall: 335

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100% of the buses with Ricon lifts were recalled.

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

Coch & Equipment builds and installs bus bodies on purchased chassis, primarily Ford E-series "cutaway" chassis. Most of these are equipped with wheel chair lifts manufactured either by Braun Corporation or by Ricon Corporation. The recall population was selected by identifying which buses were equipped with the Ricon lifts subject to recall 07E-097.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

Certain of Ricor's S-series and K-series lifts fail to comply with FMVSS 403 57. Anti-Stow Interlock feature may fail to comply with lift testing procedures.

Describe the cause(s) of the defect or noncompliance condition.

The pressure sensing switch that detects weight on the platform might not be adjusted to the proper sensitivity level.

Describe the consequence(s) of the defect or noncompliance condition.

If weight on the lift is not detected, the lift might begin to tilt towards the vehicle while a passenger is on it. This could cause the occupant to slide or fall from the lift and suffer injury.

Identify any warning which can (a) precede or (b) occur.

None

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

Ricor Corporation, 7900 Nelson Road, Panama City, CA 91402

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

Oscar Pardini, Director of Business Development and Communications

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

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.

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.

Coach & Equipment received a letter from Ricon Corporation dated June 23, 2008, postmarked July 9 and received July 14, 2008 notifying us of the noncompliance. We do not know how they discovered the noncompliance nor what tests they performed.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

Coach & Equipment Manufacturing Corp. is acting as an intermediary between the end customer and Ricon Corporation. As we were instructed to do by Ricon, we identified all customers having potentially noncompliant lifts and sent them a notification letter instructing them to contact Ricon to make an appointment with their nearest Ricon dealer to receive free service to remedy the noncompliance.

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

The remedy is to perform a test of the anti-stow feature by putting a 50 pound weight on the inboard end of the platform and depressing the stow button. If the lift stows with the weight on it the pressure switch must be adjusted by turning the switch counterclockwise in 1/4 turn increments and re-testing until the platform no-longer stows with the weight on it.

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

No component replacement is involved.

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.

Ricon Corporation tells us they have corrected the noncompliance in their production operations. By the time Coach of Equipment were notified of the noncompliance, all non-compliant lifts had been installed in buses and shipped to customers.

VI. Identify the Recall Schedule

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

Letters were sent to all affected customers on or about August 28, 2008. Ricon is tracking which lifts have been tested and brought into compliance, if needed.

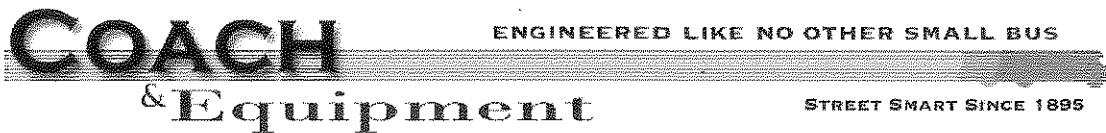
VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

Attachment :

- 1) Copy of letter sent to customers
- 2) Copy of redrafted letter as per ODI instructions 9/11/08.



August 18, 2008

Operations Manager
ABC Customer
123 Street

RE: **Wheel Chair Lift** Equipment Safety Standard Non-Compliance
Notification #07E-097.

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

Dear Manager:

Our records indicate that you may have one or more buses built by Coach & Equipment Manufacturing Corp. that has a wheelchair lift built by Ricon Corporation between April 1, 2005 and September 6, 2006, inclusive. Ricon Corporation has determined that a safety related non-compliance with Section 6.10.2.3 of the FMVSS 403 exists in these wheelchair lifts. This is a different recall from the one we notified you about in the spring of 2008.

WHAT IS BEING RECALLED:

This recall process applies to the "Anti-Stow Interlock" only, on Ricon's 1200, 2000, and 5500 series platform lifts labeled for "DOT Public Use" and "DOT Private Use".

WHY IT IS BEING RECALLED:

The non-compliance is the result of the Anti-Stow Interlock System not detecting the presence of a 50 pound test weight when the weight is located close to the pivot point of the platform. In the event this were to occur during passenger operations it might be possible for the lift platform to begin stowing while a wheel chair or mobility aid user was still occupying the platform close to the pivot point of the platform. This situation could cause personal injury.

WHAT YOU, THE OWNER OF THE BUS, NEED TO DO:

1. Park the vehicle in a safe location.
2. Open the lift door and deploy the lift to the floor level position.
3. Place a 50 pound test weight (6" x 12") at the most inboard end of the platform, oriented lengthwise along the length of the platform. There is a "non-skid" decal on the platform that defines this location.
4. Depress the Stow button. The platform should not stow. If the platform does not stow, the lift is properly adjusted and is working properly. If the platform stows with the test weight on it, continue with the following procedure:
 - a). Remove the pump cover and locate the anti-stow pressure switch.
 - b). Remove the "jam" set screw in the center of the switch and turn the adjusting set screw one half turn counterclockwise.
 - c). Place the test weight in the prescribed position.
 - d). Adjust pressure switch in the counterclockwise direction until such point where, when the Stow function is depressed, the lift will not stow with the test weight in the prescribed location. It is good practice to adjust the switch 1/8 – 1/4 turn at a time.
 - e). Once pressure switch is set, replace the jam lock screw. Note: when tightening the lock screw, the adjustment screw may turn up to 1/4 turn.
 - f). Re-test to make sure lift will not stow with the test weight in prescribed location.
 - g). Remove test weight.
 - h). Depress the Stow switch. Lift should stow with platform empty.

Note: Previous procedures relied on the number of "clicks" heard from the pump solenoid. It is normal for a properly adjusted lift to execute 15 or more "clicks".

WHAT RICON WILL DO:

Ricon Corporation will assist you with making the necessary adjustments to the pressure switch(es) on your lift(s). If your people are factory trained to make the adjustments, you may make them at your own location. If your people are not factory trained, Ricon will arrange for the adjustment to be made at the nearest Ricon authorized service center / dealer. These adjustments will be completed at no charge to you. Whether the repairs are done by you or an authorized Ricon Dealer, Ricon will pay a \$37.50 labor charge. No parts are necessary to correct this noncompliance.

If the lift is adjusted by an authorized Ricon dealer and it is not completed within 3 business days, please notify Ricon Customer Support at the following number: (800) 322-2884.

If, after contacting the 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 Avenue, SE
Washington, DC 20590
Phone (888) 327-4236

Thank you for your prompt attention to this matter. If you have any questions concerning these procedures, please contact Oscar Pardinias, Director of Business Development and Communications at Ricon Corporation at (818) 267-3000 or at OPardinias@Wabtec.com.

Sincerely,

James McMullen
CEO
Coach & Equipment Manufacturing Corp.

COACH
& Equipment

ENGINEERED LIKE NO OTHER SMALL BUS

STREET SMART SINCE 1895

September 12, 2008

Operations Manager
ABC Customer
123 Street

RE: **Wheel Chair Lift** Equipment Safety Standard Non-Compliance
Notification #07E-097.

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

Dear Manager:

Our records indicate that you may have one or more buses built by Coach & Equipment Manufacturing Corp. equipped with a wheelchair lift built by Ricon Corporation between April 1, 2005 and September 6, 2006, inclusive. Ricon Corporation has determined that a safety related non-compliance with Section 6.10.2.3 of the FMVSS 403 exists in these wheelchair lifts.

WHAT IS BEING RECALLED:

This recall process applies to Coach & Equipment Phoenix buses from model years 2005 and 2006 equipped with Ricon's 1200, 2000, and 5500 series platform lifts labeled for "DOT Public Use" and "DOT Private Use".

WHY IT IS BEING RECALLED:

The non-compliance is the result of the Anti-Stow Interlock System not detecting the presence of a 50 pound test weight when the weight is located close to the pivot point of the platform. In the event the Anti-Stow Interlock System were to fail during passenger operations it might be possible for the lift platform to begin stowing while a wheel chair or mobility aid user was still occupying the platform close to the pivot point of the platform. This situation could cause personal injury.

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Sincerely,

James McMullen
CEO
Coach & Equipment Manufacturing Corp.