

September 9, 2008

NHTSA
Office of Defects Investigation Enforcement
1200 New Jersey Avenue SE
Washington, DC 20590

08V-482
(16 pages)

Attn: Alex Ansley

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Re: Matter EQ08-011

Dear Mr. Ansley:

Please allow this letter to confirm receipt of correspondence received from George Person regarding the above-referenced matter. Said correspondence indicated that National Van Builders had not responded to Noncompliance Reports submitted by Ricon Corporation as recall Nos. 07E-097 and 07E-095. Enclosed please find a completed Part 573 Noncompliance Report for Ricon recall No. 07E-097 for your review and approval.

National Van's Part 573 Report for recall No. 07E-095 was completed and approved by NHTSA on March 21, 2008. A copy of NHTSA's recall acknowledgement is attached for your reference. All affected customers have been notified pursuant to that recall. I do not believe any further action is required for this recall. If this is incorrect, please advise what additional action is needed.

Please advise if the enclosed Part 573 Noncompliance Report for recall No. 07E-097 is acceptable to NHTSA at your earliest convenience. Should you have any questions or require additional information, please contact me directly. Thank you for your assistance.

Very truly yours,


Glen K. Perlman
Sr. Vice President / General Counsel

RECEIVED

2008 SEP 17 10:35 AM

DEFECTS INVESTIGATION
RECALL MGMT DIV.

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Report¹

On July 30, 2008, 2002, National Van Builders Inc. [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 Reports.

Date this report was prepared: August 1, 2008

Furnish the manufacturer's identification code for this recall (if applicable): 07E-097

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.

National Van Builders Inc.

80 Pine St.

Attleboro, MA 02703

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

Glen Perlman, Sr. Vice President/General Counsel

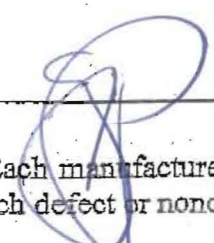
Telephone Number: 508-222-2272 Fax No.: 508-222-7882

Name and Title of Person who prepared this report.

Glen Perlman

Sr. Vice President/General Counsel

Signed:


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

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210 or by FAX at (202) 366-7882.

L. 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:

Make(s): Ford Model Years Involved: 2005-2008 Model(s): Econoline
Production Dates: Beginning: 4/1/05 Ending: _____
VIN Range: Beginning: _____ Ending: _____
Vehicle Type: Van Bodystyle: _____

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

Vehicles sold through July 2008 equipped with Ricon 2000 series wheelchair lifts

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 Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

II. Identify the Recall Population

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

<u>Vehicles</u>			<u>Number of</u>
<u>Model</u>	<u>Econoline</u>	<u>Year</u>	<u>Potentially</u>
		2005-2008	
<u>Involved</u>			
43			

Total Number Potentially Affected by the Recall: 43

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

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:

National Van Builders Inc recall is being issued pursuant to
a recall notice received from Ricon Corporation dated June 23, 2008
Ricon Corp. is the manufacturer of the potentially defective
component. A copy of such recall notice is attached.

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.

Ricon brand wheelchair lifts manufactured between April 5, 2005
and September 6, 2006

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

Potential noncompliance of anti-stow interlock required by
FMVSS 6. 10. 2. 3

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

Possible failure of anti-stow interlock system to detect the
presence of a 50 pound test weight. When the weight is located
close to the pivot point for the platform.

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

Unknown

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

Ricon Corporation
7900 Nelson Rd.
Panorama City, CA 91402

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

Oscar Pardinias Vice President Sales & Marketing

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.

Please see attached recall notice of Ricon Corporation

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.

Defect to be repaired by Ricon Corp. authorized service center or technician nearest to customer's locale.

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

Lift to be made fully FMVSS 403 compliant.

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.

Please see recall notice of Ricon Corporation

VI. Identify the Recall Schedule

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.

All affected customers shall be notified by mail immediatley
upon receipt of NHTSA approval for this recall notice.

VII. Furnish Recall Communications

9. 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) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.



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

June 23, 2008

Glen Perlman
National Van Builders, Inc.
80 Pine Street
Attleboro, MA 02703-3907

RE: 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 Vehicle Safety Act.

Dear Glen,

Ricon Corp. needs your assistance in notifying your customers about a recall of certain wheelchair lift products built between April 1, 2005 and September 6, 2006 inclusive. Ricon Corporation has determined that a safety related non-compliance with S6.10.2.3 of the FMVSS 403 exists in public and private use wheelchair lifts manufactured by Ricon on the above dates.

YOU MUST NOTIFY NHTSA AND CONDUCT A SAFETY RECALL: According to our records, affected units were installed as original equipment on vehicles at your facility. You must notify the National Highway Traffic Safety Administration (NHTSA) and conduct a safety recall of those vehicles. It is critical that the National Highway Traffic Safety Administration NHTSA guidelines are followed in a timely manner and that your customers are notified to discontinue the use of the Wheelchair Lift until they schedule a time for you to repair the vehicle. You may contact the NHTSA with questions by sending an email to rmd.odi@dot.gov.

To help you comply with your obligation to issue a safety recall of the vehicles that contain an affected Wheelchair Lift, we have attached samples of a dealer service bulletin and a sample letter to owners of potentially affected vehicles, along with a corresponding owner reply form, which should facilitate your notification to dealers and owners of the recall and the required repairs and service procedures. Although we have provided these samples to you for your convenience, you **MUST** submit drafts of your version of these notices to NHTSA for approval at least 5 days prior to mailing such notification to dealers and owners of potentially affected Wheelchair Lifts.

Important: Dealer notification by Certified Mail is required by Federal law for all safety recalls. Responsible dealership personnel should be instructed to sign for this Certified mail without hesitation as it contains urgent safety recall information. Notifications to owners of potentially



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

affected vehicles are by first class mail. Please be advised that the outside of each envelope containing an owner notification letter must be marked "SAFETY RECALL NOTICE" all in capital letters, either in boldface or underlined, and in type that is larger than that used in the address section. A sample of the envelope must be submitted to NHTSA for approval at least 5 business days before mailing to owners.

IMPORTANT: Some of the vehicles affected may still be in your inventory. Federal law requires you to complete the recall service on these vehicles before delivery. Ricon Corp. will provide replacement or repair for these units prior to delivery to your customers.

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". It does not apply to other Ricon products.

WHY IS IT BEING RECALLED:

The non-compliance with S6.10.2.3 of the FMVSS 403 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 for the platform. In the event this condition occurs during passenger operations it may be possible for the lift platform to begin stowing while a wheelchair or mobility aid user is still occupying the area of the platform close to the pivot point of the platform. This situation could cause personal injury.

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:

NHTSA – equipment non-compliance notification



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

Adjustment Procedures

Note – Test weight dimensions are 6 x 6 x 12 inches

1. **Park the vehicle in a safe location.**
2. **Open the lift door(s) and deploy the lift to the floor level position.**
3. **Place the 50lb test weight oriented lengthwise along the length of the platform and at the most inboard end of the platform operation volume. There is a non-skid decal on the platform that defines this location.**
4. **Depress the Stow button. Platform should not stow. If platform does not stow, the lift is properly adjusted. If platform stows with the test weigh, 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 location.**
 - 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 lock screw. Note – When tightening the lock screw, the adjustment screw may turn up to ¼ turn.**
 - f. **Re-test to make sure lift will not stow with test weight in prescribed location**
 - g. **Remove test weight**
 - h. **Depress the stow switch. Lift should stow with empty platform.**

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 CORPORATION WILL DO:

Upon notification from your end-user customer, Ricon will work with them to make the necessary adjustments to the pressure switch (es) on their lift (s). If the end-user is already factory trained to perform service on Ricon products, the adjustment can be done at the end-user’s location. If the end-user is not factory trained to perform service on Ricon products, we will arrange for the adjustment to be done at the nearest Ricon authorized service center/dealer.



Ricon Corporation
A Division of Vapor Bus International
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Fax: 818.267.3001
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The lift adjustments will be completed at no charge to the end-user. Whether the repairs are done by the end-user 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 toll free number listed above.

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 inspection or repairs upon receipt of the customer (end-user) contact information from each OEM.

Thank you for your prompt attention to this matter. If you have any questions concerning these procedures please contact Ricon's Customer Service at (800)322-2884 email me directly at OPardinas@Wabtec.com.

Sincerely,

A handwritten signature in black ink, appearing to be "OP", written in a cursive style.

Oscar Pardinas
Vice President Sales and Marketing
Ricon Corp.

SN #	Model #	Ship date	Reg. Acct	Order Acct	Reg. Acct Name
196029	S2005-F1020000A	09/18/06	598508	*****	NATIONAL VAN BUILDERS, INC
214441	S2010-F1020000A	04/04/07	151900	598508	NATIONAL VAN BUILDERS, INC
189030-R	S2005-F1020000A	11/04/05	598508	598508	NATIONAL VAN BUILDERS, INC
193031	S2005-F1020000A	11/04/05	598508	598508	NATIONAL VAN BUILDERS, INC
193032	S2005-F1020000A	11/04/05	598508	598508	NATIONAL VAN BUILDERS, INC
193029	S2005-F1020000A	11/04/05	598508	598508	NATIONAL VAN BUILDERS, INC
193030	S2005-F1020000A	11/04/05	598508	598508	NATIONAL VAN BUILDERS, INC
193028	S2005-F1020000A	11/04/05	598508	598508	NATIONAL VAN BUILDERS, INC
192980	K2005-F1020000A	11/04/05	598508	598508	NATIONAL VAN BUILDERS, INC
183814-R	K2005-F1020000A	11/04/05	598508	598508	NATIONAL VAN BUILDERS, INC
193041	K2005-F1020000A	11/08/05	598508	598508	NATIONAL VAN BUILDERS, INC
193043	K2005-F1020000A	11/08/05	598508	598508	NATIONAL VAN BUILDERS, INC
196867	S2005-F1020000A	02/28/06	598508	598508	NATIONAL VAN BUILDERS, INC
196866	S2005-F1020000A	02/28/06	598508	598508	NATIONAL VAN BUILDERS, INC
196865	S2005-F1020000A	02/28/06	598508	598508	NATIONAL VAN BUILDERS, INC
196864	S2005-F1020000A	02/28/06	598508	598508	NATIONAL VAN BUILDERS, INC
196863	S2005-F1020000A	02/28/06	598508	598508	NATIONAL VAN BUILDERS, INC
196862	S2005-F1020000A	02/28/06	598508	598508	NATIONAL VAN BUILDERS, INC
196830	S2005-F1020000A	02/28/06	598508	598508	NATIONAL VAN BUILDERS, INC
196829	S2005-F1020000A	02/28/06	598508	598508	NATIONAL VAN BUILDERS, INC
196868	S2005-F1020000A	02/28/06	598508	598508	NATIONAL VAN BUILDERS, INC
197033	S2005-F1020000A	03/08/06	598508	598508	NATIONAL VAN BUILDERS, INC
199832	K2010-F1020000A	05/23/06	598508	598508	NATIONAL VAN BUILDERS, INC
198969	K2010-F1020000A	05/23/06	598508	598508	NATIONAL VAN BUILDERS, INC
205642	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
205646	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
205645	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
205643	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
205644	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
205649	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
205650	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
205651	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
205647	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
205648	S2010-F1020000A	09/15/06	598508	598508	NATIONAL VAN BUILDERS, INC
214439	S2010-F1020000A	04/04/07	598508	598508	NATIONAL VAN BUILDERS, INC
214437	S2010-F1020000A	04/04/07	598508	598508	NATIONAL VAN BUILDERS, INC
214438	S2010-F1020000A	04/04/07	598508	598508	NATIONAL VAN BUILDERS, INC
214436	S2010-F1020000A	04/04/07	598508	598508	NATIONAL VAN BUILDERS, INC
214435	S2010-F1020000A	04/04/07	598508	598508	NATIONAL VAN BUILDERS, INC
214433	S2010-F1020000A	04/04/07	598508	598508	NATIONAL VAN BUILDERS, INC
214434	S2010-F1020000A	04/04/07	598508	598508	NATIONAL VAN BUILDERS, INC
214440	S2010-F1020000A	04/04/07	598508	598508	NATIONAL VAN BUILDERS, INC
214442	S2010-F1020000A	04/04/07	598508	598508	NATIONAL VAN BUILDERS, INC



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

June 23, 2008

Safety Standard Non-Compliance Recall Notification - #07E-097

This notice is posted as a convenience to our customers who wish to check their Ricon lift serial number(s) against the master list of lifts requiring inspection and/or repair. Ricon Corp. has determined that a safety related non-compliance with S6.10.2.3 of the 403 (Anti Stow interlock) exists in certain "DOT Public Use" and "DOT Private" platform wheelchair lifts manufactured between April 1, 2005 and September 6, 2006.

WHY ARE WE CONDUCTING THIS RECALL:

The non-compliance with S6.10.2.3 of the FMVSS 403 is the result of the Anti Stow Interlock not detecting the presence of a 50lb test weight on the inboard end of the platform operating volume. In the event this condition occurs during passenger operations the wheelchair lift may begin to stow while occupied by a wheelchair or mobility aid user. This situation could cause personal injury.

WHAT YOU SHOULD DO:

If your serial # is one of those included in this recall follow the procedures outlined below to perform modifications as follow:

Adjustment Procedures

- 1. Park the vehicle in a safe location.**
- 2. Open the lift door(s) and deploy the lift to the floor level position.**
- 3. Place the 50lb test weight oriented lengthwise along the length of the platform and at the most inboard end of the platform operation volume. There is a non-skid decal on the platform that defines this location.**
- 4. Depress the Stow button. Platform should not stow. If platform does not stow, the lift is properly adjusted. If platform stows with the test weigh, 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.**



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Fax: 818.267.3001
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- c. **Place the test weight in the prescribed location.**
- 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 lock screw. Note – When tightening the lock screw, the adjustment screw may turn up to ¼ turn.**
- f. **Re-test to make sure lift will not stow with test weight in prescribed location**
- g. **Remove test weight**
- h. **Depress the stow switch. Lift should stow with empty platform.**

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 CORPORATION WILL DO:

If you are already factory trained to perform service on Ricon lifts, the adjustments can be done at your location. If you are not factory trained to service Ricon lifts, we will arrange for the repairs to be done at the nearest Ricon authorized service center/dealer.

We have attached an “Inspection/Repair Log”, for your convenience, to record the inspection and/or adjustments that are completed on your lifts. Please download this form and return a copy of the completed Log indicating the inspection and/or repairs were completed to 818/267-3139.

Thank you for your prompt attention to this matter. If you have any questions concerning these procedures please contact Ricon at (800) 322-2884 or by email at opardinas@wabtec.com

RECALL NOTICE
RICON 1200, 2000 and 5000 SERIES WHEELCHAIR LIFTS

August 1, 2008

Aetna Ambulance
275 New State Road PO Box 300
Manchester, CT 06045

- SAMPLE -

Dear Customer:

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

Ricon Corp, in conjunction with National Van Builders, Inc. has decided that certain wheelchair lift products built between April 1, 2005 and September 6, 2006 fail to conform to the requirements of Federal Motor Vehicle Safety Standard No. 403, Platform Lift Systems for Motor Vehicles.

This defect may result in the failure of the Anti-Stow interlock system to detect the presence of a 50 pound test weight when the weight is located close to the pivot point for the platform. In the event this condition occurs during passenger operations the it may be possible for the lift platform to begin stowing while a wheelchair or mobility aid user is still occupying the area of the platform close to the pivot point of the platform. This situation could cause personal injury.

Your Ricon lift has been identified as one of the lifts which is the subject of this Recall Notice. You should immediately have your lift serviced by your local Ricon authorized service center for testing and adjustment, if necessary, of the pressure switch which will correct the defect. There is no charge for this service. If you are unable to locate a Ricon service center or if your lift is inspected and /or repaired by an authorized Ricon dealer and it is not completed within 3 business days, please notify Ricon Customer Support toll free at 800 322 2884.

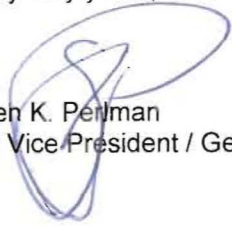
If you have had this repair performed before you received this letter, you may be eligible to receive reimbursement for the cost of obtaining a pre-notification remedy of the problem associated with this recall. For more information, contact Ricon Customer Support at 800 322 2884 or National Van Builders at 800 527 7477.

If, after contacting the authorized dealer and Ricon Customer Support at 800 322 2884, your inspection and / or repair is not completed in a reasonable time and without charge, you may notify: Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue SE, Washington, DC 20590; or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>.

We sincerely appreciate your business and apologize for any inconvenience this recall may have caused. Please feel free to contact me directly at 800 527 7477 with any questions or concerns.

Very truly yours,

Glen K. Penman
Sr. Vice President / General Counsel

A handwritten signature in blue ink, appearing to be "Glen K. Penman", written over a large, light blue circular scribble.