



700 Cross Pointe Rd.
Gahanna, OH 43230
(614)231-7640 Fax: (614)231-7680

1515 W. Deer Valley Rd., C-108
Phoenix, AZ 85027
(800)776-9984 Fax: (623)581-2922

September 12, 2008

1200 New Jersey Ave SE
Washington, DC 20590

08V-496
(28 pages)

In reference to EQ08-011

Dear Sir or Madam:

The purpose of this letter is to respond to the notification we received on September 8, 2008 concerning the recall of Ricon wheelchair lifts manufactured between April 1, 2005 and October 9, 2007. We did initially receive notifications from Ricon Corporation in March and July of 2008 about the recalls 07E-095 and 07E-097. I had attempted to contact Oscar Pardinias at first by phone and later via e-mail. He was extremely difficult to contact, I had to make several phone calls and send several e-mails before my inquiries were returned. He was supposed to send me out a sample letter to an end user via e-mail (one was not sent with the packet). We are currently still waiting for the sample letter. At the same time we were trying to find out why we were being asked to contact our customers about the recall instead of Ricon doing it directly. Whenever we install a Ricon wheelchair lift we have to (as the installer) fill out the warranty cards and send them in as well as have the customer send their copy in with their information. It just seemed to us at the time that they were trying to pass the buck. Mr. Pardinias was unable to explain to me why this was the case saying simply that he thought we would have better contact information for the customers. It wasn't until after speaking with Alex Ansley, a member of the staff at the Office of Defects Investigation Enforcement on September 10, 2008 that I understood why our involvement was necessary. Alex was extremely helpful and answered several questions that I had asked regarding what exactly had to be sent out and why.

Included with this letter is our "Defect and Noncompliance Responsibility" report. It was downloaded from your web site and answered as fully and honestly as possible. Also included is a sample packet of what we are intending on sending our end users for you to review. This packet will include 1) a sample letter to our end users, 2) the list of model and serial numbers affected 3) a diagram showing the position of the test weight, and 4) an "inspection/Repair Log" for the customer's connivance to record the completion of the repair work done. With the packet is a mailing envelope for you to approve as well.

We as a company fall in to the category of "vehicle manufacturer". We will be making contact with every customer that we sold a La Boit coach to that included Ricon wheelchair lifts during the applicable time frame. We do not record the serial numbers of the wheelchair lifts we as we install them. That is why we are sending out the list of several serial numbers Ricon Corp. has

RECEIVED

2008 SEP 25 10:35 AM

DEFECTS INVESTIGATION
RECALL MGMT DIV.



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provided us with. This will only affect eight La Boit coaches over a two year span of time. We have received no complaints or injury reports related to this recall.

I believe that includes everything requested. If anything has been omitted or needs to be expanded upon please contact me as soon as time permits and I will immediately furnish you with anything you may need.

Sincerely,

Ryan Depriest
General Manager La Boit, Inc.
614-231-7640
depriestryan@yahoo.com

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

On November 1, 2007, Ricon Corporation 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 11, 2008

Furnish the manufacturer's identification code for this recall (if applicable): 07E-095

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.

La Boit, Inc.

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

Ryan Depriest, General Manager La Boit, Inc.
E-mail: depriestryan@yahoo.com

Telephone Number: 614-231-7640 **Fax No.:** 614-231-7680

Name and Title of Person who prepared this report.

Ryan Depriest
General Manager

Signed:

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

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

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:

Make(s): Ford Model Years Involved: 2006-2007 Model(s): e-450

Production Dates: Beginning: 04/06 Ending:12/07

VIN Range: Beginning: Non Sequential Ending: Non Sequential

Vehicle Type: Truck Bodystyle: Box

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

Any truck that included a Ricon Wheelchair Lift.

Make(s): GMC Model Years Involved:2006-2007 Model(s): 5500

Production Dates: Beginning: 04/06 Ending:12/07

VIN Range: Beginning: Non Sequential Ending: Non Sequential

Vehicle Type: Truck Bodystyle: Box

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

Any truck that included a Ricon Wheelchair lift.

Make(s): Workhorse Model Years Involved:2006-2007 Model(s): N/A

Production Dates: Beginning: 04/06 Ending:12/07

VIN Range: Beginning: Non Sequential Ending: Non Sequential

Vehicle Type: Class A Bodystyle: Box

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

Any Class A that included a Ricon Wheelchair lift.

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.

6%

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>
All	2006-2007	8

Total Number Potentially Affected by the Recall: 8

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100%

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:

The recall population was determined by selecting any truck we produced between 2006-2007 that had a Ricon Wheelchair lift installed.

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.

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 defect or noncompliance condition.

Results from a misinterpretation of the testing parameters.

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

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 the 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

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.

N/A

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 of Ricon Corporation's determination of noncompliance. There have been no claims, accidents, injuries or fatalities associated with the noncompliance.

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.

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.

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

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.

Beginning September 10, 2008 all possible vehicles affected will be identified. Letters to purchasers of said vehicles will be sent out after NHTSA approves the sample letters sent with this report.

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.



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1515 W. Deer Valley Rd., C-108
 Phoenix, AZ 85027
 (800)776-9984 Fax: (623)581-2922

September 12, 2008

Customer address goes here

Ricon Recall Notification (#07E-095)

Dear Vehicle Owner:

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

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 between April 1, 2005 and October 9, 2007 inclusive.

According to our records your vehicle has a wheelchair lift that is most likely included in this recall. To make absolutely sure please check the serial number on your wheelchair lift and compare it to the eight serial numbers listed below. If your serial number does not match the eight listed below please disregard the following information as your lift is excluded from this recall.

SN#	Model #	Ship date	Reg. Acct.	Order Acct.	Reg. Acct. Name
195710	S5510-F1020000A	04/22/06	530700	530700	LA BOIT, INC.
195701	S5510-F1020000A	06/19/06	530700	530700	LA BOIT, INC.
195702	S5510-F1020000A	07/11/06	530700	530700	LA BOIT, INC.
203522-D	S5510-F1020000A	12/22/06	530700	530700	LA BOIT, INC.
210689	S5510-F1020000A	01/22/07	530700	530700	LA BOIT, INC.
212633	S5510-F1020000A	03/16/07	530700	530700	LA BOIT, INC.
213914	S5510-F1020000A	05/15/07	530700	530700	LA BOIT, INC.
219299	S5510-F1020000A	08/27/07	530700	530700	LA BOIT, INC.

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.



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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.

WHAT YOU AS THE OWNER SHOULD DO:

Locate the Serial number on your lift. On the Ricon website, enter the serial # in the space provided at the bottom of the page and press submit. If your serial # is one of those included in this recall follow this procedure. If you are not a Ricon authorized service facility please contact Ricon directly so that you can locate a Ricon authorized repair agent near you. Ricon will make sure that the lift adjustments are completed at no charge to you.

If the lift is brought to an authorized Ricon dealer for repair and the work is not completed within 3 business days, please notify Ricon Customer Support at 1-800-322-2884.

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 submit a written complaint to the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, SW, Washington, D.C. 20590, or call 1-888-DASH-2-DOT (1-888-327-4236). (Washington DC residents use 1-202-366-0123).

Please take the enclosed Owner Notification Form (the attached document with the Ricon Corporations letterhead) with you at the time of your appointment and give it to your dealer. The form identifies the vehicle and the service that is required.

Also included in your packet of information is an inspection/repair log. Ask the dealer to fill out and return the log to you after the work is completed. This way you have a record of the changes made to your wheelchair lift.

We regret any inconvenience which this recall may cause you. However we are concerned about your safety and the safety of your customers as well.

Thank you for your attention to this important matter.

Ryan Depriest
General Manger La Boit, Inc./Chassis Division
614-231-7640
depriestryan@yahoo.com



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

INSPECTION/REPAIR LOG

Recall # 07E-095
 Threshold Warning System

Date _____

Owner Name _____

Owner Address _____

Lift Serial Number	Description of Work	Date Completed	Technician Name
	Apply Kit 39979		
	Apply Kit 39979		
	Apply Kit 39979		
	Apply Kit 39979		
	Apply Kit 39979		
	Apply Kit 39979		
	Apply Kit 39979		
	Apply Kit 39979		
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	Apply Kit 39979		
	Apply Kit 39979		
	Apply Kit 39979		
	Apply Kit 39979		

PLEASE RETURN A COPY OF THIS FORM WITH THE REQUESTED INFORMATION THAT
 MUST BE REPORTED TO NHTSA. THANK YOU



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7900 Nelson Road
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Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

February 29, 2008

Safety Standard Non-Compliance Recall Notification - #07E-095

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 S6.1 of the 403 (Threshold Warning System) exists in certain "DOT Public Use" and "DOT Private" platform wheelchair lifts manufactured between April 1, 2005 and October 9, 2007.

WHY ARE WE CONDUCTING THIS RECALL:

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.

WHAT YOU SHOULD DO:

On the Ricon website, locate the Serial number(s) on your lift(s). Enter each serial # in the space provided at the bottom of this page and press submit. If your serial # is one of those included in this recall follow the procedures outlined below to perform modifications as follow:

You will require Kit # 39979, supplied by Ricon at no charge

- 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:



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

If you are already factory trained to perform service on Ricon lifts, the repairs 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.

Upon notification Ricon will provide you or the Ricon authorized dealer, the replacement parts kit. We will provide all the necessary adjustment instructions and/or replacement parts Free of Charge.

We have attached an "Inspection/Repair Log", for your convenience, to record the inspection and/or repairs 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 (818) 267-3085 or by email at opardinas@wabtec.com

SN #	Model #	Ship date	Reg. Acct	Order Acct	Reg. Acct Name	
195710	S5510-F1020000A	04/22/06	530700	530700	LABOIT, INC.	409723
195701	S5510-F1020000A	06/19/06	530700	530700	LABOIT, INC.	412985
195702	S5510-F1020000A	07/11/06	530700	530700	LABOIT, INC.	414004
203522-D	S5510-F1020000C	12/22/06	530700	530700	LABOIT, INC.	422138
210689	S5510-F1020000A	01/22/07	530700	530700	LABOIT, INC.	422937
212633	S5510-F1020000A	03/16/07	530700	530700	LABOIT, INC.	426748
213914	S5510-F1020000A	05/15/07	530700	530700	LABOIT, INC.	429954
219299	S5510-F1020000A	08/27/07	530700	530700	LABOIT, INC.	435125

La Boit Inc.
C/O Ryan Depriest
700 Cross Pointe Rd.
Gahanna, OH 43230

End User Address

SAFETY REACLL NOTICE

SAMPLE ENVELOPE



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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Panorama City, CA 91402

Phone: 818.267.3000
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www.Wabtec.com

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



Ricon Corporation
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Phone: 818.267.3000
Fax: 818.267.3001
www.Wabtec.com

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.



Ricon Corporation
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Phone: 818.267.3000
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www.Wabtec.com

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.



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

NHTSA – noncompliance notification

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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,

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



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February 29, 2008

Recall Manager
ABC Corporation
123 Main Street
Anytown, USA

RE: Equipment Safety Standard Non-Compliance Notification #07E-095

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.

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.odj@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



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hesitation as it contains urgent safety recall information. Notifications to owners of potentially 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 “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.

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.**



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Thank you for your prompt attention to this matter. If you have any questions concerning these procedures please contact the undersigned at (818) 267-3085 or by email at OPardinas@Wabtec.com.

Sincerely,

Oscar Pardinas
Director – Business Development and Communications
Ricon Corp.