



September 22, 2006

Associate Administrator for Enforcement  
National Highway traffic Safety Administration  
400 7th Street, S.W. Suite 5319  
Washington, D.C. 20590

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations - Defect and Noncompliance Reports, Collins Bus Corporation is submitting information relating to a safety recall we are conducting. Specific information is as follows:

**573.6(c)(1) Vehicles affected are manufactured by:**

Collins Bus Corporation, a division of Collins Industries, Inc., is the manufacturer of the vehicles affected by this safety recall.

**573.6(c)(2) The following vehicle models are being recalled:**

This recall affects Certain Collins school buses manufactured between February 2007, and May 2007 at the South Hutchinson, Kansas assembly plant. The vehicles are identified as "Bantam", "Super Bantam" or "Grand Bantam" school bus models equipped with Model LOCK601-GD wheelchair lift interlock module manufactured by Intermotive Inc.

**573.6(c)(3) The total number of vehicles potentially containing the defect is:**

Collins Bus Corporation built 8 (eight) vehicles that utilized interlocks which were identified by the Intermotive Inc. to potentially contain a defect. All buses are presently in the possession of end users.

**573.6(c)(4) The approximate percentage of the total number of vehicles to contain the defect is:**

Due to the nature of the defect the percentage of total vehicles to actually contain the defect is unknown. It is believed to be close to 100 percent however.

**573.6(c)(5) Description of the defect:**

The potential defect is in the firmware of the indicated model interlock modules which allows the modules to go into "fault" mode when they should not be going into that operation mode.

The potential defect may result if the vehicles battery voltage drops below 7.5 volts. This can occur when the battery voltage is low and the engine is cranked, while other accessories are on. When the interlock module goes into fault mode the module may not lock the shifter into place when the lift door is opened as it is supposed to do. This would then be in violation of FMVSS 403 which describes the interlocks and how they are to function for a school bus equipped with a wheel chair lift

**573.6(c)(6) The following is a summary of all the events that were the basis for determining the defect.**

On May 9, 2007 Collins Bus Corporation received a Owner Notification Program letter ONP-2007-01 submitted by Intermotive which described the problems with the subject interlock module. On May 17, 2007 Collins Bus corp sent information to Intermotive concerning six buses that had the subject interlock in them and gave Intermotive the end users contact name and telephone number and left it up to Intermotive to work out the replacement/repair of these modules with the end user.

On September 15, 2008 Collins Bus Corp received from Alex Ansley of NHTSA a copy of a 573 report submitted to NHTSA by Intermotive Inc. This report outlined and defined the safety defect as noted above.

Collins Bus Corporation has had no reports of warranty claims or service issues regarding the functionality of the interlocks in installed the specified vehicles. Collins at this time looking through past purchase orders found potentially two more buses that may have the subject interlock installed in them. The end user information was forwarded to Intermotive for their action and followup.

Collins Bus Corporation has determined that a proactive safety recall is necessary to insure the proper operation of these interlocks.

**573.6(c)(7) Test results or data:**

The determination of this potential safety concern is based on operational test done by the end user under the direction of Collins Bus and Intermotive Inc. The basis of the campaign is noncompliance with FMVSS 403.

**573.6(c)(8)(ii) Correspondence to notify Collins Bus Corporation distributors and Customers of the safety recall:**

Mailing of Customer and Distributor notification letters is scheduled to be completed by October 17, 2008. A repair procedure and parts will be available from Intermotive Inc. at the time of the mailing.

**573.6(c)(11)**

Collins Bus Corporation will use the campaign identification number assigned by NHTSA.

Should you need further information, my contact information is as follows:

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Sincerely,  
**COLLINS BUS CORPORATION**



Steve Gladow  
Engineering Manager