

Safety Defect and Noncompliance Report Guide for Vehicles  
**PART 573 Defect and Noncompliance Responsibility and Reports**<sup>1</sup>

On October 21, 2009 Turtle Top [MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. \_\_\_\_\_) 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: October 22, 2009

Furnish the manufacturer's identification code for this recall (if applicable): Luminator (09E-054)

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.

Independent Protection Company, Inc., Turtle Top Division

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

Janet L. Kercher-Dudley, Standards Engineer

Telephone Number: (574)831-4340 X146 Fax No.: (574)831-4349

Name and Title of Person who prepared this report.  
Janet L. Kercher-Dudley, Standards Engineer

Signed:



<sup>1</sup> 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](mailto: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): Turtle Top Model Years Involved: 2004-2005 Model(s): Terra Transit, Odyssey, Odyssey XL

Production Dates: Beginning: 10-13-2003 Ending: 10-20-2005

VIN Range: Beginning: Various Ending: Various

Vehicle Type: Bus Bodystyle: Transit Bus

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

Recalled vehicles have a Luminator Holding LP front and side LED destination sign installed.

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.**

**II. Identify the Recall Population**

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

<b>Model</b>	<b>Year</b>	<b>Number of Vehicles Potentially Involved</b>
Terra Transit	2004-2005	17
Odyssey	2004	9
Odyssey XL	2005	3

**Total Number Potentially Affected by the Recall:** 29

**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:**

Recalled vehicles have a Luminator Holding LP front and side LED destination sign installed.  
Announcement on recalled equipment was sent to Turtle Top from Luminator with information on affected signs and part numbers. Turtle Top requested and received from Luminator additional information on what Turtle Top specifically purchased (shipments report) from Luminator for the time frame covered by the recall. Configuration drawings from Luminator were subsequently received which assisted in identifying specific configurations of components with Luminator's recalled parts. Based on this information from Luminator, along with sales order information for specific vehicles where the recalled equipment parts were optioned into the sales order, Turtle Top was able to determined potential vehicles affected under this recall.

**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.**

Destination signs included in the recall are manufactured by Luminator and are installed on transit bus manufacturer's such as Turtle Top. Affected side signs have a connector board which allows the sign system to interconnect to rear signs in certain configurations. If a rear sign is not used, the connector is open; this open connector can possibly corrode. Photos by Luminator illustrating the problem are included with Luminator's 573 Defect and Noncompliance Report on file with the NHTSA.

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

From the announcement from Luminator in a service bulletin, note the following: "This notice is to alert operators that corrosion on connector pins may result in premature product failure. Corrosion may potentially form in a high humidity environment or where moisture is present."

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

From the announcement from Luminator in a service bulletin, note the following: "This corrosion raises the potential of pin shorting that may result in failure. If not addressed the failure could result in a potential electrical short or lead to smoking or in rare instances fires."

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

Visual corrosion on the connector pins. Circuit breaker tripping. Smoke.

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

Luminator Holding, LP

900 Klein Road

Plano, TX 75074

(972)516-3033

**Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:**  
David Major, Controller

**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.**

A chronological summary of events that lead to the identification of the root cause by Luminator is outlined in Luminator's 573 Defect and Noncompliance Report on file with the NHTSA.

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**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.**

As noted on Luminator's 573 Defect and Noncompliance Report on file with the NHTSA, "On all buses built before 2007 the connector board will be replaced with a newly designed board. The new board eliminates the possibility of arcing by putting the ground and battery voltage on separate layers of the board. The traces have also been moved to allow the maximum spacing. In addition conformal coating has been applied below the connector and a cap is installed on all open connectors to prevent the incursion of moisture and debris which would allow corrosion to develop." Replacement and repairs to be completed by Luminator are free of charge to customers.

**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.**

Luminator's remedy stated in question #8 above. The differences between the recall condition and the remedy as noted on Luminator's 573 Defect and Noncompliance Report on file with the NHTSA, "1. New Connector Board, part number 508331-001 (replaces 506746-001), 2. Ground and power on two separate layers of PWA, 3. Traces are more widely spaced, 4. Connector assembled to the board with a gap so that conformal coating can be applied to the connector solder joints."

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

Luminator's characteristics of the remedy versus the recalled equipment stated in question #9 above.

**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 according to Luminator's 573 Defect and Noncompliance Report on file with the NHTSA, which stated "Since May of 2009 all signs built by Luminator have been shipped with a vinyl cap covering all connectors. These caps are to remain in place unless a cable is attached to the connector. The connector board change has gone in effect as of 09/20/2009."

**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.**

Luminator's timeline was provided to the NHTSA in an appendix with their 573 Defect and Noncompliance Report. Once Turtle Top's 573 Defect and Noncompliance Report and accompanying Draft Notification Letter has been approved by the NHTSA ODI, then Turtle Top's customers will promptly be notified of the safety recall and the vehicle customer's Turtle Top distributorship will also be notified.

## 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.**

Additional note from Turtle Top: Turtle Top is furnishing to the NHTSA ODI, along with this report, a draft notification letter to vehicle customers affected by Luminator's equipment recall. Once letter is approved, Turtle Top will furnish the letter to Luminator with affected vehicle customer's names and addresses and Luminator will contact Turtle Top customer's about the recall.

Luminator will file quarterly reports to the NHTSA in conjunction with the recall campaign, 09E-054.

Turtle Top understands that as the vehicle manufacturer, if Luminator should not handle the campaign to the satisfaction of the NHTSA, Turtle Top may be required to conduct the recall campaign for the affected Turtle Top vehicle customers.