



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

April 19, 2010

MR. RICHARD SULLIVAN  
PRESIDENT  
COMM-TRANS  
792 SOUTH COOPER STREET  
MEMPHIS, TN 38104

NVS-215kjs  
10V-151

**SUBJECT: WHEELCHAIR LIFTS/INTERLOCK BELT**

**DEAR MR. SULLIVAN:**

This letter serves to acknowledge Comm-Trans' notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall campaign which will be conducted pursuant to Federal law for the vehicles listed below.

Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**

FORD/E-150/2007-2009  
FORD/E-250/2007-2009  
FORD/E-350/2007-2009

**NHTSA Campaign Number:** 10V-151      **Mfg's Report Date:** April 2, 2010

**Components:** EQUIPMENT ADAPTIVE

**Potential Number of Units Affected:** 65

**Summary:**

COMM-TRANS IS RECALLING CERTAIN MODEL YEAR 2007-2009 ADA CONVERSION VANS BUILT ON FORD E-150, E-250, AND E-350 CHASSIS BETWEEN DECEMBER 7, 2007 AND DECEMBER 23, 2009 AND FITTED WITH RICON PUBLIC USE LIFTS. THE RESTRAINT BELT ON THESE LIFTS WAS DESIGNED TO PREVENT THE LIFT FROM MOVING, UNLESS THE TONGUE OF THE BELT IS FULLY ENGAGED AND LATCHED IN THE BUCKLE. RICON HAS DISCOVERED, HOWEVER, THAT IT IS POSSIBLE FOR THE OPERATOR TO INSERT THE BELT TONGUE INTO THE BUCKLE WITHOUT FULLY ENGAGING THE LATCHING MECHANISM. IN THIS CASE, THE RESTRAINT BELT WOULD

APPEAR TO BE LATCHED, AND THE OPERATOR COULD RUN THE LIFT. IF THE RESTRAINT BELT TONGUE IS NOT FULLY ENGAGED INTO THE RESTRAINT BELT BUCKLE, AND LATCHED, THE LIFT MAY OPERATE WITH AN OCCUPANT ON THE PLATFORM.

**Consequence:**

THE USER OF THE LIFT COULD BE INJURED SHOULD THE LIFT MOVE WITHOUT THE RESTRAINT BELT PROPERLY BUCKLED.

**Remedy:**

COMM-TRANS IS WORKING WITH RICON AND RICON WILL BE PERFORMING THE REMEDY FOR THIS CAMPAIGN. PLEASE SEE RICON'S DEFECT REPORT 09E-060. RICON WILL PROVIDE CUSTOMERS WITH A WARNING DECAL AND A DVD-BASED TRAINING AID. THE SAFETY RECALL IS EXPECTED TO BEGIN DURING APRIL 2010. OWNERS MAY CONTACT RICON AT 1-818-267-3000 OR COMM-TRANS AT 1-901-726-9394.

**Notes:**

CUSTOMERS MAY CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S VEHICLE SAFETY HOTLINE AT 1-888-327-4236 (TTY: 1-800-424-9153); OR GO TO [HTTP://WWW.SAFERCAR.GOV](http://www.safercar.gov).

The information in your defect report appears to satisfy the requirements of 49 CFR 573.6.

We have reviewed Comm-Trans' proposed owner notification letter and it meets the requirements of Part 577. Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within 30 days after the close of the calendar quarter in which the campaign was initiated. Thereafter, quarterly reports will be due on or before 30 days after close of the calendar quarter.

Your contact for this recall will be Kelly Schuler, who may be reached by phone at 202-366-5227, by email at [Kelly.Schuler@dot.gov](mailto:Kelly.Schuler@dot.gov), or through the office email at [RMD.ODI@dot.gov](mailto:RMD.ODI@dot.gov). We look forward to working with you for the successful completion of this recall campaign.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Person".

George H. Person  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement