



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

1200 New Jersey Avenue SE  
Washington, DC 20590

April 23, 2010

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

NVS-215kjs  
10V-153

**SUBJECT: WHEELCHAIR LIFTS/UP BUTTON**

**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-153      **Mfg's Report Date:** April 19, 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 CERTAIN RICON S SERIES AND K SERIES L-MODEL WHEELCHAIR LIFTS. DUE TO A PROBLEM IN THE SOFTWARE THAT CONTROLS THE LIFT'S "UP" FUNCTION, SHOULD THE "UP" BUTTON BE RELEASED BEFORE THE FLOOR LEVEL LIMIT SWITCH IS ACTIVATED, THE LIFT MAY CONTINUE ITS UPWARD TRAVEL AND MAY OVERRUN THE FLOOR LEVEL CUT OFF POINT.

**Consequence:**

WHEN THE PLATFORM OVERRUNS THE VEHICLE FLOOR LEVEL AND STOPS AT AN ANGLE FROM 15-20 DEGREES, IT IS POSSIBLE FOR A PERSON IN A WHEELCHAIR TO TIP OVER AND FOR SOMEONE STANDING ON THE PLATFORM TO FALL, POSSIBLY RESULTING IN INJURIES.

**Remedy:**

COMM-TRANS WILL NOTIFY OWNERS AND THE REPAIRS WILL BE PERFORMED BY AUTHORIZED RICON DEALERS FREE OF CHARGE. A SOFTWARE SOLUTION FOR THIS SAFETY DEFECT IS UNDER INVESTIGATION. UNTIL THE SOFTWARE SOLUTION IS AVAILABLE, RICON WILL PROVIDE OWNERS WITH A BULLETIN OUTLINING PROPER WHEELCHAIR LIFT OPERATION AND WILL SHIP OWNERS A DVD-BASED TRAINING AID TO PROMOTE PROPER LIFT OPERATION AT NO COST. 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:**

THIS RECALL ONLY PERTAINS TO VEHICLES ALTERED BY COMM-TRANS AND HAS NO RELATION TO ANY VEHICLES MANUFACTURED BY FORD MOTOR COMPANY. 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