

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

On March 10, 2010 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: March 10, 2010

Furnish the manufacturer's identification code for this recall (if applicable): Trans/Air (09E-042)

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: 2007-2008 Model(s): Odyssey XL

Production Dates: Beginning: 03-12-2007 Ending: 05-30-2008

VIN Range: Beginning: Various Ending: Various

Vehicle Type: Bus Bodystyle: Transit Bus / Coach

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

Recalled vehicles have a Trans/Air EC 2.5 Climate Control Electrical System.

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>
Odyssey XL	2007	1
Odyssey XL	2008	1

**Total Number Potentially Affected by the Recall:** 2

**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 Trans/Air EC series air conditioning kit with relay board installed.  
Announcement on recalled equipment was sent to Turtle Top from Trans/Air with information on affected climate control systems and part numbers in the form of a service bulletin (#09-002).  
Based on this information from Trans Air, along with sales order information for specific vehicles where the recalled equipment parts were optioned into the sales order, Turtle Top was able to determine 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.**

Affected climate control systems kits contain an a relay board and an EC PC board, which if improperly installed, could overheat. The relay board with a 12-position terminal strip with screws mount to a PC board. Trans/Air concluded that the relay board presents a risk of overheating under any of the following conditions: loose screws due to improper torquing, poor wire connections due to improper crimped terminals, or debris deposited on the EC board.

Photos by Trans/Air illustrating the problem are included with Trans/Air's service bulletin #09-002.

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

see above

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

From the announcement from Trans/Air in service bulletin # 09-002, note the following: "improper installation practices can result in electrical arcing and overheating of the EC board. In the worst case scenario, such arching and overheating can result in a fire".

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

Inspection of wiring. Poor crimps with wire stands too long or in poor position and heat discoloration of a poor (loose) crimp.

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

Trans/Air Manufacturing Corporation

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480 East Locust Street P.O. Box 70

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Dallastown, PA 17313-0070

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(717)246-2627

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**Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:**

Mark Slobodian, Vice President

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**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.**

Trans/Air proposed to include 100% of the EC series relay boards it sold since Trans/Air does not know how many installers failed to comply with Trans/Air installation instructions as outlined in Trans/Air'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 Trans/Air's 573 Defect and Noncompliance Report on file with the NHTSA, "With respect to its air-conditioning systems out in the field, Trans/Air proposes to inspect (or have inspected) all EC system relay boards already installed on buses or other commercial vehicles. This inspection will ensure that the board is properly installed. As part of this effort, Trans/Air will also replace all existing terminal-strip screws with new torx head screws with a self-locking mechanism. Instructions will be provided to torque the screws to the proper torque specification. Inspection will be given to inspect and replace any improper crimped terminals. Instructions will be provided to inspect for and remove any foreign material deposited on the board. Finally, Trans/Air will also provide a protective cover with warning label to be installed over the terminal strip."

**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.**

Trans/Air's remedy stated in question #8 above. Per Trans/Air's 573 Defect and Noncompliance Report 09E-042 on file with the NHTSA, "Trans/Air's production remedy will be identical to the field fix." Turtle Top will notify owners and the buses will be repaired by Trans/Air free of charge. Trans/Air is instituting a mandatory safety corrective action program.

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

Trans/Air'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 Trans/Air's 573 Defect and Noncompliance Report on file with the NHTSA. Trans/Air has developed a product improvement kit for systems after July 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.**

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 vehicles' 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.**