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Barry Wolff **Director of Risk Management** 631W. 11th Street Winamac, IN 46996 USA Phone: (574) 946-6153 ext. 3024 (800) 946-7513 Fax [574] 946 2341

Email:barry.wolff@braunlift.com

THE BRAUN CORPORATION "Providing Access to the World"



March 9, 2010

10V-110 (12 Pages)

Mr. Daniel C. Smith Associate Administrator for Enforcement National Highway Traffic Safety Administration 1200 New Jersey Ave., S.E. Washington, DC 20590

Re: Recall of Braun manufactured handicapped accessible mobility vehicles Ref. NHTSA Campaign Number:

Dear Mr. Smith:

Pursuant to 49 CFR Part 573, we are submitting the enclosed Defect and Noncompliance Report. Attached are drafts of the proposed Dealer notification letter, and the proposed notification to the end user. In addition, I have included our Safety Recall Notice Service Bulletin.

Our Director of Product Support, Mr. Rick Nelson will be coordinating the recall campaign in the event you or your staff needs to speak with him. He may be reached at 1-800-946-7513, extension 3272.

Sincerely,

BarryÆ. Wolff

Director of Risk Management

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Safety Defect and Noncompliance Report Guide for Vehicles PART 573 Defect and Noncompliance Reports

On March 8, 2010, The Braun Corporation decided that a defect which relates to motor vehicle safety 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 <u>Defect and Noncompliance Responsibility and Reports</u>.

Date this report was prepared: March 8, 2010

Furnish the manufacturer's identification code for this recall: N/A

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 <u>mailing</u> <u>address</u> of the designated agent as prescribed by 49 U.S.C. §30164:

The Braun Corporation

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

Rick Nelson Director of Product Support

Telephone Number: 1-800-946-7513 Extension 3272

Fax Number: **574-946-3143**

Name and Title of Person who prepared this report:

Braj & Moiss

Barry Wolff Director of Risk Management

Signed:

I. Identify the Vehicle Models Involved in this Recall

2. Identify the Vehicles Involved in this Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): General Motors

Model Years Involved: 2005-2008

Model(s): Chevrolet Uplander Entervan, Pontiac Montana Entervan, Buick Terraza Entervan.

Production Dates: Beginning: July 1, 2004

Ending: May 7, 2008

Chevrolet VIN Range: Beginning: 1GBDV13L55D221189

Ending: 1GBDV13W98D173033

Buick VIN Range: Beginning: 4GLDV13L25D293204

Ending: 4GLDV13W97D208971

Pontiac VIN Range: Beginning: 1G5DV13E45D108323

Ending: 1GMDV33L66D133434

Vehicle Type: Low floor minivan

Bodystyle: Entervan

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

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: 100 percent.

II. Identify the Recall Population

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

		Number of Vehicles
Model	Year	Potentially Involved
Chevrolet Uplander	2005-2008	3688
Buick Terraza	2005-2008	1222
Pontiac Montana	2005-2008	465

Total Number Potentially Affected by the Recall: 5375

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: Less than 1 percent.

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 items of equipment:

The recall population was determined to be all handicapped accessible low floor minivan conversions built on a GM minivan chassis. The beginning date was determined to be the date on which the first 2005 model Entervan was manufactured. The final date was determined to be the date the design changed to eliminate the need for modifying the OEM trailing arm.

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.

During conversion, the driver or passenger side trailing arm modification may not have been adequately welded.

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

Inadequate welding technique employed.

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

The consequence of the defect is that a squeaking, or clunking noise may develop, the trailing arm bushings may prematurely wear, and the trailing arm may fracture or separate, allowing the rear axle to become partially separated from the chassis.

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

A driver may hear a squeaking or clunking sound emanating from the rear of the vehicle. This could indicate a loosening of the trailing arm structure. In addition, a rough ride may develop.

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

N/A

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

N/A

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.

On March 13, 2009, Braun received notice of a customer complaint from Transport Canada. Based on this notice, Braun made an internal investigation and found that it had received reports of 33 broken trailing arms. Further, we determined the trailing arms did not

spontaneously fail without warning to the vehicle driver. Nonetheless, Braun has decided to conduct a voluntary recall. The symptoms range from squeaking components, to broken welds. To date, there have been no reports of injuries, or fatalities.

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.

N/A

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 the 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.

Braun will notify our dealer network of this event which will include the inspection procedure as well as the retrofit procedure if required. Braun will provide our dealer network a supply of retrofit parts to have on hand to reduce the wait time for our end user customers. Once this notification to our dealer network is complete, we will mail the end user notifications one week afterward using first class U.S. mail service. The Braun Corporation will enlist the services of a professional mailing service to send the notifications to our dealer network and the end user customers. These notifications will be sent first class U.S. mail.

Braun will reimburse our dealers one hour labor for the inspection and an additional two hours labor if the retrofit is required. Our dealer network will use a recall reimbursement program located on our website to reduce administrative effort and increase reporting accuracy.

We will supply a toll free phone number for the end user customers to ask questions concerning this recall.

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.

See the attached Safety Recall Notice Service Bulletin. The recall condition should clearly evidence missing or inadequate welding of the trailing arm components. The remedy will include an inspection of the trailing arms, followed by re-welding the components per factory specifications.

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

See the attached Safety Recall Notice Service Bulletin.

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 on May 8th, 2008. This took the form of a redesigned floor structure that eliminated the need to modify the OEM trailing arm. The production remedy is not identical to the recall remedy.

VI. Identify the Recall Schedule

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.

The Braun Corporation anticipates the recall campaign will begin during April, 2010. At that time, Dealers will be notified of their

responsibilities in coordinating the campaign and making remedies to the recall population. Also, end users will begin to be notified regarding the recall. The only foreseeable problem centers on our ability in identifying end users, as their identities are only known if they submitted a warranty registration card to The Braun Corporation. We will work closely with Dealers to identify end users who are unknown to us. We will also enlist the registration services of RL Polk to help identify current vehicle owners.

VII. Furnish Recall Communications

9. 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 573.8 requirements.

See the attached proposed recall communications.

Safety Recall Notice Service Bulletin 36144

March 2010

Trailing Arm Inspection and Reinforcement Plate Retrofit Instructions Applicable for 2005-2008 GM Entervan® Lowered Floor Conversions



ACAUTION

Inspect trailing arm welds and repair as specified in this bulletin if required. Failure to do so may result in property damage.

Introduction: Modified trailing arm weldments are located forward of the rear wheels. The trailing arm weldments must be inspected by a Braun approved technician.

Inspect the weld identified below in Photos A and B (remove debris and undercoating from weld area). There must be solid penetrating welds where identified. Missing or questionable welds must be repaired and/or replaced by a certified welder.

A Braun-supplied reinforcement plate must be welded to the inside of the trailing arm if a problem weld is detected. Procedures are typical for both sides (driver side shown).

Inspection

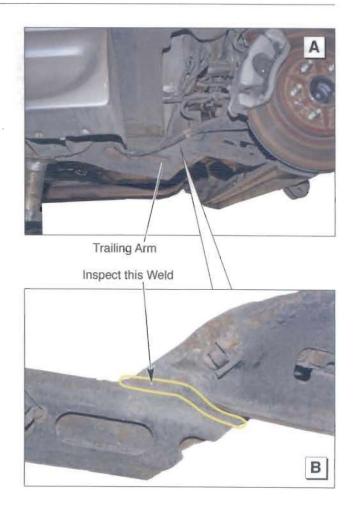
- Remove rear wheel.
- Inspect trailing arm weld identified in Photos A and B. Remove debris and undercoating from weld area.

Ensure the presence of the weld and verify the weld is free of cracks.

If the weld is present and free of cracks, no further action is required. Apply undercoating and install rear wheel.

If the weld is missing or cracked proceed to Step 3.

Repeat procedures on opposite side.



Service Bulletin 36144 Page 1

2005-2008 GM Entervan® Trailing Arm Bulletin 36144

Resecurement - Welding - Outside

3. Disconnect vehicle battery.

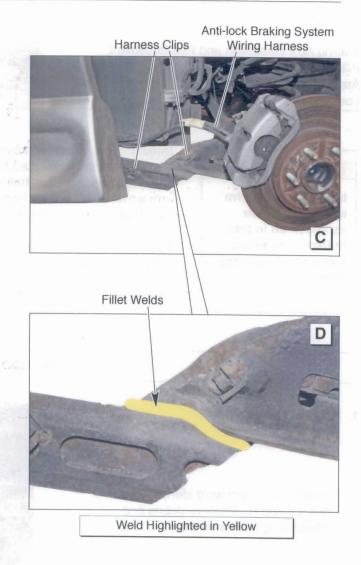
Shield fuel system components before grinding or welding.

 Remove anti-lock braking system wiring harness from securement clips and secure harness clear of the trailing arm. See Photo C.

Remove under coating and seam sealer from the weld areas. Remove questionable weld(s). Ensure surfaces to be welded are free of weld slag and grinding debris.

 Apply penetrating fillet welds along the edges of brackets as shown in Photo D.

Proceed with reinforcement bracket retrofit.



2005-2008 GM Entervan® Trailing Arm Bulletin 36144

Reinforcement Plate Retrofit - Inside



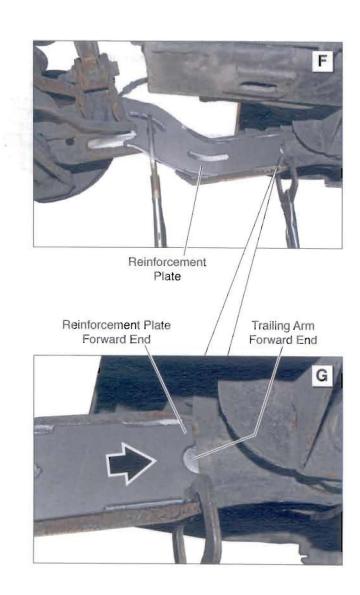


Inside of Trailing Arm

 Clean surface on inside of trailing arm (remove any debris, undercoating, or rust). See Photo E.

Center reinforcement plate on inside of trailing arm with the forward end of reinforcement plate flush with forward end of trailing arm.
 See Photos F and G.

Weld reinforcement plate as shown in Photos H and I on page 4.



2005-2008 GM Entervan® Trailing Arm Bulletin 36144

Reinforcement Plate Retrofit - Inside

- Weld reinforcement plate as shown in Photos H and I. Yellow areas in Photo H indicate weld locations.
- Clean affected surfaces (be sure welding and grinding debris is removed). Apply under coating thoroughly over affected areas.
- 11. Place anti-lock braking system wiring harness in securement clips. See Photo C.
- 12. Mount tire and wheel assembly. Tighten securely (follow OEM manual procedures).
- 13. Repeat process on opposite side.
- 14. Connect vehicle battery.

