



MOTOR COACH INDUSTRIES

RECEIVED

By Recall Management Division at 10:54 am, Mar 24, 2010

Timothy J. Nalepka  
Senior Vice President & General Counsel

Direct Line: (847) 285-2085  
Facsimile: (502) 318-8085

March 19, 2010

**BY EMAIL AND**  
**BY CERTIFIED MAIL**

10V-114  
(15 Pages)

Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attention: Recall Management Division (NVS – 215)  
1200 New Jersey Avenue, SE.  
Washington, DC 20590

Re: **CORRECTED PART 573 NOTICE RE RICON RESTRAINT BELT (09E-060)**

Dear Sir or Madam:

I have enclosed Motor Coach Industries, Inc.'s ("MCI") corrected Part 573 Defect and Noncompliance Report. The report submitted yesterday had erroneous dates on the first page.

Please confirm receipt of this notice and provide NHTSA's reference number. MCI's proposed customer notification letter, draft Service Bulletin 342, and sample envelope and mailing label will be sent under separate cover.

Thanks for your assistance with this matter.

Sincerely,  
MOTOR COACH INDUSTRIES, INC.

By: Timothy J. Nalepka  
Senior Vice President &  
General Counsel

Enclosure

c: Sonny Murianka (by email, w/ encl.)

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

On **March 11, 2010**, Motor Coach Industries, Inc. 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 **Defect and Noncompliance Reports**.

Date this report was prepared: **March 19, 2010**

Furnish the manufacturer's identification code for this recall (if applicable):

**MCI Service Bulletin 342**

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.

**Motor Coach Industries, Inc.  
1700 E. Golf Road  
Suite 300  
Schaumburg, IL 60173**

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

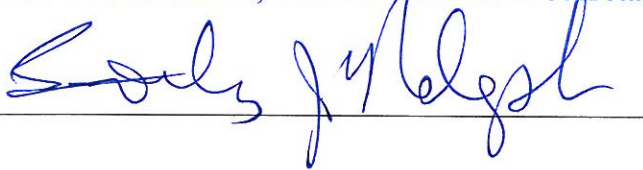
**Bryan Couch, Vice President & General Manager**

Telephone Number: **(204) 287-4444** Fax No.: **(204) 478-2867**

Name and Title of Person who prepared this report.

**Timothy J. Nalepka  
Senior Vice President, General Counsel & Secretary**

Signed: \_\_\_\_\_



**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:**

All MCI D series motor coaches that are equipped with a Ricon F9 series cassette wheelchair lift as described more specifically in the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009.

**Make(s):** MCI

- Model Years and Models Involved:**
1. 2009 D4000
  2. 2008 thru 2010 D4500
  3. 2008 thru 2010 D4505

**Production Dates:**

- |                         |                                  |                              |
|-------------------------|----------------------------------|------------------------------|
| 1. 2009 D4000           | <b>Beginning:</b> September 2008 | <b>Ending:</b> February 2009 |
| 2. 2008 thru 2010 D4500 | <b>Beginning:</b> August 2007    | <b>Ending:</b> February 2010 |
| 3. 2008 thru 2010 D4505 | <b>Beginning:</b> January 2008   | <b>Ending:</b> December 2009 |

**VIN Range:**

- |                         |                         |                      |
|-------------------------|-------------------------|----------------------|
| 1. 2009 D4000           | <b>Beginning:</b> 58473 | <b>Ending:</b> 58917 |
| 2. 2008 thru 2010 D4500 | <b>Beginning:</b> 58204 | <b>Ending:</b> 59347 |
| 3. 2008 thru 2010 D4505 | <b>Beginning:</b> 58430 | <b>Ending:</b> 59301 |

58204 – 58213	58215 - 58216	58430 – 58434	58473 – 58486	58492 – 58499
58508 – 58509	58511	58513 -58521	58523	58534 – 58535
58550 – 58557	58590 – 58599	58601 – 58607	58609 – 57630	58637
58639	58641	58643	58645	58647
58649	58651	58653	58655	58657
58659	58661 – 58674	58685	58687	58691
58741	58743	58746	58752	58775 – 58777
58811 – 58829	58838 – 58840	58861 – 58862	58879	58887 – 58889

58909	58911	58913	58915	58917
58949 – 58950	58961 – 58979	58992	59027 – 59046	59051 – 59052
59064 – 59069	59092 – 59098	59124 – 59127	59130 – 59132	59256 – 59260
59270	59276 – 59280	59300 – 59301	59346 - 59347	

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

The recalled vehicles are the MCI D series motor coaches that are equipped with a Ricon F9 series cassette wheelchair lift manufactured after November 2007, as further described in the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009.

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 Widgets equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

The recall population is approximately 22% of the total D coach population produced during the model years referenced above.

**II. Identify the Recall Population**

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

<u>MODELS</u>	<u>MODEL YEARS</u>	<u>NUMBER OF VEHICLES INVOLVED</u>
D4000	2009	9
D4500	2008	73
D4500	2009	63
D4500	2010	7
D4505	2008	57
D4505	2009	32
D4505	2010	8

Total Number Affected by the Recall: 249

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

100% of the vehicles noted in section II.3.

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:

MCI determined the recall population by identifying the motor coaches containing a Ricon wheelchair lift within the population of wheelchair lifts specified by Ricon in the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009.

### 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.

The Ricon wheelchair lift is equipped with a restraint belt that has an interlock feature designed to prevent the lift from operating if the belt tongue is not fully inserted and latched in the belt buckle. However, Ricon reports that, apparently due to a change in the switch used in the buckle for the interlock, the lift may operate even if the belt tongue is not fully inserted in and latched in the belt buckle. Please see the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009 for further information.

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

Ricon reports the cause to be the operator not fully engaging the belt into the buckle, which may permit the wheelchair lift to be operated with the belt unlatched. Please see the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009 for further information.

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

Ricon reports that if the tongue is not fully latched in the buckle, the wheelchair lift can operate and a wheelchair may not be adequately protected against movement. Please see the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009 for further information.

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

Ricon reports that failure to hear an audible click as the latching mechanism engages indicates that the belt tongue is not fully inserted and latched, and that if tugged, the tongue would come out of the buckle. Please see the attached Ricon Corporation Part 573

Defect and Noncompliance Responsibility Report dated November 2, 2009 for further information.

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

Ricon Corporation  
7900 Nelson Road  
Panorama City, Calif. 91402

Please see the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009 for further information with respect to Ricon's component supplier.

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

Stanton Saucier, General Manager

#### **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 principal 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.

Please see section IV.10. of the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009 for this information.

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. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

Ricon reports that it will provide instructional information and warning decals for all affected wheelchair lifts. Please see section V.12. of the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009 for further information.

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

Please see section V.13. of the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009 for this information.

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.

Please see section V.14. of the attached Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report dated November 2, 2009 for this information.

#### VI. Identify the Recall Schedule

9. 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.

MCI anticipates sending notifications to customers within one week after receiving approval by NHTSA of MCI's draft customer notification.

#### VII. Furnish Recall Communications

10. 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) for review prior to mailing.*

MCI will submit its proposed customer notification letter and Service Bulletin 342 under separate cover.

Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.



Ricon Corporation  
7900 Nelson Road  
Panorama City, CA 91402

09E-060 (5 pages)

Phone: 818.267.3000  
Fax: 818.267.3001  
[www.Wabtec.com](http://www.Wabtec.com)

November 3, 2009

Mr. Dan Smith  
Associate Administrator for Enforcement  
NHTSA - 215  
1200 New Jersey Ave., SE  
Washington D.C. 20590



**RECEIVED**  
By Recall Mgt Div. at 1:18 pm, Nov 16, 2009

Subject: Part 573 Defect and Noncompliance Responsibility Report – Restraint belt buckle

Reference: Ricon S & K-series Public Use Platform Lifts, Ricon F9 Series Cassette lifts

Dear Sir:

On October 30, 2009, Ricon Corporation determined that a potential safety defect may be present in a component of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 – Defect and Noncompliance Reports.

This report was prepared on November 2, 2009

The full corporate name of the fabricating manufacturer is:

Ricon Corporation  
7900 Nelson Road  
Panorama City, CA 91402

The corporate officials that the agency should contact with respect to this recall are:

Stanton Saucier  
General Manager  
[ssaucier@wabtec.com](mailto:ssaucier@wabtec.com)  
Phone 818 267-3016  
Fax 818 267-3187

Oscar Pardinias  
V.P. of Sales & Marketing  
[opardinias@wabtec.com](mailto:opardinias@wabtec.com)  
Phone 818 267-3085  
Fax 818 267-3155

Sincerely,

Oscar Pardinias  
V.P. of Sales & Marketing



Ricon Corporation  
7900 Nelson Road  
Panorama City, CA 91402

Phone: 818.267.3000  
Fax: 818.267.3001  
[www.Wabtec.com](http://www.Wabtec.com)

## **Ricon Corporation Part 573 Defect and Noncompliance Responsibility Report**

### **I - Identify the Recalled Items of Equipment**

#### **1. Identify the Items of Equipment Involved in this Recall:**

Ricon Public Use wheelchair lifts equipped with an interlocked restraint belt.

a. There are several Model names for these platform lifts:

- (1) "S" Series
- (2) "K" Series
- (3) "F9" Series

b. The model numbers for the "S" Series lifts are:

S2003  
S2005  
S2010  
S5503  
S5505  
S5510

c. The model numbers for the "K" Series lifts are:

K2003  
K2005  
K2010  
K5503  
K5505

d. The model numbers for the "F9" Series lifts are:

F9A  
F9T  
F9T-F

e. The model number for "HCL" Series lifts is:

HCL



Ricon Corporation  
7900 Nelson Road  
Panorama City, CA 91402

Phone: 818.267.3000  
Fax: 818.267.3001  
[www.Wabtec.com](http://www.Wabtec.com)

## **II. Identify the Recall Population**

2. **Identify the Recall Population:** All lifts models identified above, manufactured after November of 2007.
3. **Approximate percentage of total wheelchair lifts estimated to actually contain the defect or noncompliance:** 100 percent

## **III. Describe the Defect or Noncompliance**

4. **Describe the defect:** The lift is equipped with a restraint belt. The restraint belt has an interlock feature. The design is such that the lift will not operate if the tongue is not fully inserted and latched in the buckle. However, if the tongue is not fully inserted and latched in the buckle, the lift will operate. Though the design of the Ricon restraint buckle has not changed in many years, a forced change due to the discontinuation of the original switch used in the buckle may be at the root of the current issue. The current switch is taller and therefore, engages sooner resulting in an increase in the distance between the switch engagement and buckle latching point. The switch change occurred in December 2007.
5. **Describe the cause(s) of the defect:** The operator does not fully engage the belt into the buckle. The lift can operate with the belt unlatched.
6. **Describe the consequence(s) of the defect:** If the tongue is not fully latched in the buckle, the lift can operate and a wheelchair may not be adequately protected against movement.
7. **Identify any warning which can (a) precede or (b) occur:** Failure to hear an audible click as the latching mechanism engages. If tugged the tongue will come out of buckle.
8. **If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.**

ELECTRONIC PROFESSIONAL DESIGN (EPD)  
10118 SOPHIA AVE.  
NORTH HILLS  
CA 91343  
818-421-8995

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

Eric Tremblay - Owner



Ricon Corporation  
7900 Nelson Road  
Panorama City, CA 91402

Phone: 818.267.3000  
Fax: 818.267.3001  
[www.Wabtec.com](http://www.Wabtec.com)

#### **IV. Provide the Chronology in Determining the Defect/Noncompliance**

10. **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.**

Ricon incorporated this design of an interlocked belt in May 1998, and continues to use it to date. Ricon has manufactured thousands of wheelchair lifts incorporating this interlocking belt design. The design works well when the operator ensures that the belt tongue is fully engaged and latched in the buckle. If the operator fails to fully engage and latch the belt tongue in the buckle, the lift will operate. The restraint belt design has been in use for almost 20 years. It goes directly from discontinuing the buckle in December 2007 to an individual rolling off the platform with no apparent connection. A switch component inside of the buckle was forced to change due to a discontinuance of the original switch in December 2007. The individual proceeded to roll off the end of the platform. This is the first and only reported incident of this type. On or about September 1, 2009, Ricon received a report that an individual in Austin, Texas, had powered backwards against the lift belt and the belt tongue came out of the buckle thus defeating the restraint belt. It is unknown whether or not the belt was fully engaged with the tongue latched inside the buckle.

11. **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.**

The restraint belt and the interlock meets the requirement in 49CFR571.403 for a retention device. However, since the interlock operates correctly if the tongue is latched in the buckle, this is a safety-related defect, not a non-compliance.

#### **V. Identify the Remedy**

12. **Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.**

Since Ricon believes that this condition is preventable, Ricon will embark on an educational campaign to raise awareness of this potential condition. All affected lifts will receive instructional and warning decals.



Ricon Corporation  
7900 Nelson Road  
Panorama City, CA 91402

Phone: 818.267.3000  
Fax: 818.267.3001  
[www.Wabtec.com](http://www.Wabtec.com)

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

- a. Update all Operator manuals to alert operators to fully engage the belt tongue into the buckle with a “Click and Tug” on the belt prior to lift operation
- b. Affix a warning on the belt to “Click and Tug” prior to lift operation
- c. Edit operator’s training video to include the “Click and Tug” campaign

**14. 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.**

Same as recall remedy

**VI. Identify the Recall Schedule**

**15. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailer, and purchasers. Please identify any foreseeable problems with implementing the recall.**

Ricon Corporation anticipates the recall campaign will begin December 1, 2009. At that time, manufacturers and dealers will be notified of their responsibilities in coordinating the campaign and making remedies to the recall population.

**VII. Furnish Recall Communications**

**16. Furnish Recall Communications:** Attached for NHTSA review and approval.



Ricon Corporation  
A Division of Vapor Bus International  
7900 Nelson Road  
Panorama City, CA 91402

**RECEIVED**  
By Recall Mgt Div. at 2:20 pm, Feb 23, 2010

Phone: 818.267.3000  
Fax: 818.267.3001  
[www.Wabtec.com](http://www.Wabtec.com)

## SAFETY RECALL NOTICE

### OEM/DEALER

February 1, 2010

[OEM][DEALER]

RE: Safety Standard Non-Compliance Recall Notification 09E-060

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Dear [OEM][DEALER]:

Ricon has decided that a defect which relates to motor vehicle safety exists in the Ricon wheelchair lift installed in your vehicles.

### **! I M P O R T A N T !**

- Ricon Wheelchair Lift are being recalled
- Contact Ricon Corporation immediately

#### WHAT IS BEING RECALLED:

This recall applies to all FMVSS Public Use lift manufactured from December 1, 2007 to Dec 18, 2009 equipped with a restraint belt. This includes:

- 1). All DOT Public Use S and K Series wheelchair lifts
- 2). All DOT Public Use F9TF wheelchair lifts

#### WHY IS IT BEING RECALLED:

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. We have 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. Though it is incumbent on the operator to ensure that the belt is fully engaged and latched, failure to check this is within the realm of foreseeable misuse. This situation could cause personal injury.



Ricon Corporation  
A Division of Vapor Bus International  
7900 Nelson Road  
Panorama City, CA 91402

Phone: 818.267.3000  
Fax: 818.267.3001  
[www.Wabtec.com](http://www.Wabtec.com)

#### WHAT VEHICLE MANUFACTURES MUST DO:

According to our records, affected units were purchased by your company. If those units were installed as original equipment on vehicles manufactured at your facility, and you agree that they contain a safety defect, your company must notify the National Highway Traffic Safety Administration (NHTSA) and conduct a safety recall. This notification to NHTSA must be made within 5 business days of when you decide your vehicles contain a safety defect or noncompliance. It is critical that the NHTSA guidelines are followed in a timely manner and that your customers are notified of the safety defect in the Ricon DOT Public Use Lifts, manufactured between December 1, 2007 and December 18, 2009 so they may inform and train operators on the proper use of the equipment. You may contact the NHTSA with questions by sending an email to [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

To help you comply with your obligation to issue a safety recall of the vehicles that contain an affected Ricon DOT Public Use Lifts, manufactured between December 1, 2007 and December 18, 2009, we have attached samples of a dealer service bulletin and a sample letter to owners of potentially affected vehicles, along with a corresponding owner reply form, which should facilitate your notification to dealers and owners of the recall and the required repairs and service procedures. Although we have provided these samples to you for your convenience, you must submit drafts of your version of these notices to NHTSA for approval at least 5 days prior to mailing such notification to dealers and owners of potentially affected Ricon DOT Public Use Lifts, manufactured between December 1, 2007 and December 18, 2009.

Notification to dealers and distributors must be made by verifiable means such as certified mail, verifiable electronic means such as receipts or logs from electronic mail or satellite distribution system, or other more expeditious and verifiable means. Notifications to owners of potentially affected vehicles are by first class mail. Please be advised that the outside of each envelope containing an owner notification letter must be marked "SAFETY RECALL NOTICE" all in capital letters, either in boldface or underlined, and in type that is larger than that used in the address section. A sample of the envelope must be submitted to NHTSA for approval at least 5 business days before mailing to owners.

**IMPORTANT: Some of the vehicles affected may still be in your inventory. Federal law requires you to complete the recall service on these vehicles before delivery. Ricon will provide replacement or repair for these units prior to delivery to your customers.**

**Ricon is prepared to assist you with all the materials, the mailings and reporting requirements of this recall. Daniel Mata, Ricon's Recall Coordinator will assist you with anything you may require. He can be reached through Ricon Customer Service at (800)322-2884, Ext 3374, or by email, at [www.DMata@wabtec.com](mailto:www.DMata@wabtec.com)**



Ricon Corporation  
A Division of Vapor Bus International  
7900 Nelson Road  
Panorama City, CA 91402

Phone: 818.267.3000  
Fax: 818.267.3001  
[www.Wabtec.com](http://www.Wabtec.com)

WHAT RICON CORPORATION WILL DO:

Ricon will provide your customers with a warning decal and a DVD-based training aid to promote the "Click and Tug" campaign. Ricon may provide other point of use materials to raise the awareness of the "Click and Tug" campaign.

Thank you for your prompt attention to this matter. If you have any questions concerning these procedures please contact Ricon Customer Service at (800)322-2884, extension 3374 to speak to our Recall Coordinator, Daniel Mata, or by email at [DMata@wabtec.com](mailto:DMata@wabtec.com).

We apologize for any inconvenience this safety recall may cause, but your safety is our first concern.

Sincerely,

Oscar Pardinas  
Vice President - Sales and Marketing  
Ricon Corp.  
On behalf of  
[OEM]