

Elkhart Coach

52807 County Road 7
Elkhart, Indiana 46514

March 26, 2010

Alex Ansley

US DOT- NHTSA
Office of Defects Investigation
Recall Management / W46-437
1200 New Jersey Ave SE
Washington, DC 20590

Re: Defect Information Notice 09E-060

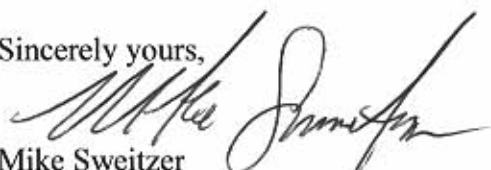
Mr. Ansley:

In accordance with Part 573 of Title 49 of the Code of Federal Regulations, Elkhart Coach, a Division of Forest River Inc., reports a safety campaign to recall 41 Elkhart Coach Buses manufactured between December 1, 2007 to December 18, 2009 with a defect in Ricon Corp Wheelchair Lift restraint belt.

Attached is Elkhart Coach's Defect Information Notice, a copy of the Dealer Letter, and a copy of the Owner Letter.

Please contact me if you have any questions. msweitzer@forestriverinc.com or 574-264-5179 Ext. 113

Sincerely yours,


Mike Sweitzer

Elkhart Coach

52807 County Road 7
Elkhart, Indiana 46514

Defect Information Report (Section 573.6)

March 26, 2010

(c)(1) Manufacturer: Elkhart Coach

52807 County Road 7
Elkhart, Indiana 46514
(574) 264-5179

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

(c)(2) Vehicles identification: "S" Series, "K" Series, "F9" Series

Models affected: S2003, S2005, S2010, S5503, S5505, S5510, K2003, K2005, K2010, K5503, K5505, F9A, F9T, F9T-F, HCL

Model Years: December 1, 2007 to Dec. 18 2009

Manufacture Dates: Dec. 1, 2007 to Dec. 18, 2009

Basis for Determining Population: All lifts models identified above, manufactured after November of 2007.

Component Manufacturer if other than the vehicle manufacture: Ricon Corporation.

(c)(3) Total Number of Vehicles Potentially Affected: 41 buses

(c)(4) Percentage of Vehicles Estimated to Contain the Defect: 100%

(c)(5) Description of 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 not operate. Though the design if 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.

(c)(6) Chronology of Principle Events:

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.

Elkhart Coach

52807 County Road 7
Elkhart, Indiana 46514

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 not operate. The restraint belt design has been in use for almost 20 years. 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 around 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.

(c)(7) Noncompliance-test or other data:

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.

(c)(8) Remedial program:

Furnish a description of the manufacturer's remedy for the defect or non-compliance. 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.

Estimated Dealer Notification Date: Elkhart Coach Estimate's dealer notification to be completed and mailed certified by 3/26/2010 .

Estimated Owner Notification Date:
Elkhart Coach estimates owner notification to be complete by 4/30/2010.

Reimbursement Plan:

Elkhart Coach

52807 County Road 7

Elkhart, Indiana 46514

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.

(c)(9) Communication sent to dealers and owners:

A copy of Elkhart Coach's **dealer** notification letters been submitted with this report.

(c)(10) Copy of proposed owner notification letter: A copy of Elkhart Coach's **owner** notification letter has been submitted with this report.

(c)(11) Manufacturer's campaign number: #09E-060