

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Responsibility and Reports

On March 23, 2010, COMM-TRANS [MFR] decided that (a defect which relates to motor vehicles safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. 403) 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: April 19, 2010

Furnish the manufacturer's identification code for this recall (if applicable): 06E-060/06E-061

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.

Sully Corporation d.b.a. Comm-Trans 792 South Cooper Street, Memphis, TN 38104

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

Richard T. Sullivan, President

Telephone Number: (901) 726-9394 X 106 Fax No: (901) 272-2940

Name and Title of person who prepared this report.

Signed:

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, FAX at (202) 366-7882, or by E-Mail to 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): Ford **Model Years Involved:** 2007 - 2009 **Model(s):**
E150/E250/E350
Production Dates: Beginning: 12/07/2007
Ending: 12/23/2009
VIN Range: Beginning: 1FDNS24L18DA13100
Ending: 1FTNS24WX9DA87972
Vehicle Type: Econoline **Bodystyle:** Cargo Van

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:

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 manufacturer provided above, that the recall 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 of noncompliance.

<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
Comm-Trans ADA Conversion	2007	10 ____
_____	2008	22 _
_____	2009	33

Total Number Potentially Affected by the Recall: 65 _____

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:

Information provided by RICON

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.

When the up button is not held until the lift stops, the lift will continue to move and eventually initiate stowage, which could tilt the platform prematurely.

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

The up button is released before the lift stops completely.

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

The lift will continue to move and eventually initiate stowage, which could result in personal injury.

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

None

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, CA 91402

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: Oscar Pardinias – VP Sales & Marketing

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 limited to, the number of reports, accidents, injuries, fatalities, and 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.**
(6) Notice from Ricon

(7) Notice from Ricon

IV. 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.

The remedy will be applied as described in the OEM letters that will be sent out by Ricon. The remedy is a software solution, which will simple involve uploading the software at a authorized Ricon agent.

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.

Ricon will provide our customers with software to be installed and no further problems should occur.

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

Push and hold UP button until lift completely stops.

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, to state. If the product was discontinued, so state.

The properties that called with problems were referred to Ricon authorized dealers in their area and the problem was corrected by them.

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.**

Comm-Trans will submit this recall notice; provide Ricon with our letterhead; and updated customer information that they can notify customers using the Recall lift.

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.