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By Recall Mgt Div. at 3:39 pm, May 17, 2010

10V-206
(14 pages)

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Report³

On FEBRUARY 01, 2010, RICON CORP. [MFR] decided that (a defect which relates to motor vehicle 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 Reports.

Date this report was prepared: 05/06/10

Furnish the manufacturer's identification code for this recall (if applicable): 09E-060

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.

MobilityWORKS
1090 W. Wilbeth Rd.
AKRON, OHIO 44314

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

DENNIS SUMMERS
VICE-PRESIDENT- OPERATIONS

Telephone Number: 800-769-8267 Fax No.: 330-861-0281

Name and Title of Person who prepared this report.

DENNIS SUMMERS
VICE President- OPERATIONS

Signed: 

³Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5227 or by FAX at (202) 366-7882.

I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:

Generic name of the item: Vehicle

Make: FORD Model: E150

Part Number: RICON LIFT Size: 34" x 54"

Function: wheelchair lift

Other information which characterizes/distinguishes the items of equipment to be recalled:
ALL LIFTS MANUFACTURED AFTER NOVEMBER, 2007

Make: FORD Model: E250

Part Number: RICON LIFT Size: 34" x 54"

Function: wheelchair lift

Other information which characterizes/distinguishes the items of equipment to be recalled:
ALL LIFTS MANUFACTURED AFTER NOVEMBER, 2007

Make: FORD Model: E350

Part Number: RICON LIFT Size: 34" x 54"

Function: wheelchair lift

Other information which characterizes/distinguishes the items of equipment to be recalled:
ALL LIFTS MANUFACTURED AFTER NOVEMBER, 2007

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

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.

II. Identifying the Recall Population

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

<u>Model</u>	<u>Year</u>	<u>Number of Items Potentially Involved</u>
① E150	2008	19
② E250	2008	39
③ E350	2008	10
④ E150	2009	22
⑤ E250	2009	56
⑥ E350	2009	10

Total Number Potentially Affected by the Recall:

156

4. Furnish the approximate percentage of the total number of items of equipment 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 items of equipment:

Recall determined based on reported field incident.
A switch component inside the buckle changed
in December, 2007, establishing basis for
recall period.

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.

Defect INVOLVES AN INTERLOCK belt ON A wheelchair lift. USER MUST ENSURE belt tongue is FULL ENGAGED IN buckle OR it may unlock.

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

A switch component INSIDE of the buckle WAS FORCED to change due to A discontinuance of the ORIGINAL switch IN December 2007.

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

INDIVIDUAL MAY Roll off END of PLATFORM lift.

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

MUST ENSURE TONGUE "clicks" IN buckle, FAILURE to HEAR Audible click.

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

THE RESTRAINT belt AND the INTERLOCK MEETS REQUIREMENTS IN 49CFR571.403 FOR A Retention device. Interlock OPERATES correctly IF tongue is Latched IN the buckle, this is A safety Related defect, NOT A NON-COMFORMANCE.

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

ERIC TREMBLAY - OWNER

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.

INCIDENT REPORTED OF Belt coming loose from buckle on OR ABOUT September 1, 2009

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.

Defect is SAFETY Related NOT NON COMPLIANCE.

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 will EMBARK ON AN EDUCATIONAL CAMPAIGN to RAISE AWARENESS of this POTENTIAL CONCERN. All AFFECTED LIFTS will Receive INSTRUCTIONAL AND WARNING DECALS.

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

A RECALLED component does NOT APPLY, WARNING DECALS AND INSTRUCTIONAL INFORMATION will be PROVIDED.

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

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.

Mobilityworks anticipates the Recall campaign
to begin by JUNE 1, 2010. At that
time DEALERS AND END CUSTOMERS
will be notified.

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) for review prior to mailing.*

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

Recall # 09E-060



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

November 3, 2009

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

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
A Division of Vapor Bus International
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
Phone 818 267-3016
Fax 818 267-3187

Oscar Pardinias
V.P. of Sales & Marketing
opardinias@wabtec.com
Phone 818 267-3085
Fax 818 267-3155

Sincerely,

A handwritten signature in dark ink, appearing to be "OP" followed by a stylized flourish.

Oscar Pardinias
V.P. of Sales & Marketing



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

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



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Panorama City, CA 91402

Phone: 818.267.3000
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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
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 818.267.3000
Fax: 818.267.3001
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. 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.



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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.



SAFETY RECALL NOTICE

END USER - DRAFT

[Date]

[End User]

RE: Safety Standard Non-Compliance Recall Notification XXX-XXX

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

Dear [End User]:

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

! I M P O R T A N T !

- Your Ricon Wheelchair Lift is being recalled
- Contact Ricon Corporation immediately

WHAT IS BEING RECALLED:

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

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.

MOBILITYWORKS®

ADAPTIVE VEHICLES

MAKING THE WORLD ACCESSIBLE

WHAT YOU AS THE OWNER SHOULD DO:

Immediately instruct your drivers/operators to listen for the audible "Click" and subsequently "Tug" on the belt to ensure proper engagement and latching. This procedure is contained in the Operator's Manual and should become part of your standard operating instructions for using the Ricon wheelchair lift. Contact the Ricon Corporation and we will send you a warning decal and training aids. You can choose to have Ricon provide you with the warning decals directly or you can ask to be directed to the nearest Ricon dealer or repair agent. You can do so by calling Ricon Customer Service at (800)322-2884, emailing at www.dmata@wabtec.com or you can locate the nearest servicing dealer using the Ricon Dealer Locator on the Ricon website – www.riconcorp.com

WHAT RICON CORPORATION WILL DO:

Ricon will ship you a warning decal and a DVD-based training aid to promote the "Click and Tug" campaign. Ricon will provide instruction on how to apply it to your Ricon wheelchair lift. You may also choose to have your nearest servicing Ricon dealer apply the decal at no cost to you. Ricon may provide another point of use materials to raise the awareness of "Click and Tug". If the lift is repaired or retrofitted by an authorized Ricon dealer and it is not completed within 3 business days, please notify Ricon Customer Support at the toll free number listed above.

If after attempting to have your vehicle repaired you believe you have not been able to have your vehicle remedied without charge and within a reasonable amount of time, you may submit a complaint to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Ave., S.E., Washington, D.C., 20590; or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>.

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 www.dmata@wabtec.com.

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

MOBILITYWORKS®

ADAPTIVE VEHICLES

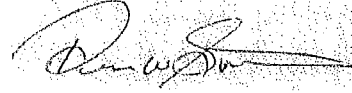
MAKING THE WORLD ACCESSIBLE

Sincerely,



Oscar Pardinas
Vice President – Sales & Marketing
Ricon Corp.
On behalf of
Mobility Works

Sincerely,



Dennis Summers
Vice President Operations
Mobility Works