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By Recall Mgt Div. at 7:31 am, Jun 04, 2010

10V-242
(7 pages)



June 3, 2010

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 June 3 2010

The full corporate name of the fabricating manufacturer is:

Mobility Transportation Services
42000 Koppernick Suite A3
Canton, Mi 48187

The corporate official that the agency should contact with respect to this recall is:

Mark Travis
Shop Foreman
mark@mobilitytrans.com
Phone 734-453-6452 ext. 205
Fax 734-753-6708

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Responsibility and Reports

On February 1, 2010, Ricon Corporation decided that (a defect which relates to motor vehicles safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. _____) 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: June 3, 2010

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

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.

**MOBILITY TRANSPORTATION SERVICES
42000 KOPPERNICK Suite A3
CANTON, MI 48187**

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

**Mark Travis
Shop Foreman
mark@mobilitytrans.com
Phone 734-453-6452 ext 205
Fax 734-453-6708**

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 E-Series Model Years Involved: 2007, 2008, & 2009

Model(s): E150, E250, & E350

Production Dates: Beginning: 9/16/2008 Ending: 4/15/2009

VIN Range: Beginning: _____ Ending: _____

Vehicle Type: Commercial Mobility Body style: Van

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

The serial number of each lift was recorded when placed in the vehicle.

Make(s): _____ Model Years Involved: _____ Model(s): _____

Production Dates: Beginning: _____ Ending: _____

VIN Range: Beginning: _____ Ending: _____

Vehicle Type: _____ Body style: _____

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: _____ Body style: _____

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?

_____ 20% _____

II. Identify the Recall Population

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

Model	Year	Number of Vehicles Potentially Involved

Total Number Potentially Affected by the Recall: 60

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 20%

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:

Mobility Transportation Services (MTS) installs Ricon and Braun wheelchair lifts in Ford E-Series vehicles. Ricon supplied MTS the serial number population of the defective lifts. The installation date and serial number of each lift is recorded for every vehicle requesting a lift at MTS. The suspect serial numbers were installed from 9/16/2010 to 4/15/2010. This was approximately 20% of the lifts installed during this period, the remainder being Braun lifts.

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 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.

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

The operator does not fully engage the belt into the buckle. The lift can operate with the belt unlatched.

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

If the tongue is not fully latched in the buckle, the lift can operate and a wheelchair may not be adequately protected against movement.

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 the buckle.

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 AVENUE
NORTH HILLS, CA 91343
818-421-8995

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 limited to, the number of reports, accidents, injuries, fatalities, and 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 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.

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.

The restraint belt and the interlock meets the requirement in 49 CFR 571.403 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.

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.

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 labels.

9. 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.

10. 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.

VI. Identify the Recall Schedule

11. 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.

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.

12. Furnish Recall Communications:

Attached for NHTSA review and approval.

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 579.5 requirements.