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By Recall Mgt Div. at 7:33 am, Jun 04, 2010



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 – L-model lift control software
Reference: Ricon S & K-series, L-model Public Use Platform 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 734-453-6708

Safety Defect and Noncompliance Report Guide for Vehicles

PART 573 Defect and Noncompliance Responsibility and Reports

On October 30, 2009, 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, whom the agency should contact with respect to this recall.

Mark Travis
Shop Foreman
mark@mobilitytrans.com
Phone 734-453-6452 ext 205
Fax 735-453-6708

Name and Title of person who prepared this report.

Mark Travis

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, & E250

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 installed 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 |
|--------------|-------------|--|
| | | |
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| | | |
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| | | |

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 defect is in the software loaded onto the printed circuit board that functions as the lift's control system. The anomaly is such that in the event an operator runs the wheelchair lift from the ground to vehicle floor level and releases the "UP" function switch before the floor level limit switch is activated, a remote possibility exists such that the lift may continue its upward travel for approximately 1 second before stopping. The continued upward travel may over-run the floor level cut off point and initiate platform stow resulting in the front of the platform tilting upward approximately 15 degrees if the combined weight of mobility aid and occupant is less than 100 lbs. and the hydraulic system relief valve has not been altered from its original factory setting.

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

A combination of an anomaly in the software and the operator releasing the "UP" button prior to the wheelchair lift completing the function and coming to a stop at vehicle floor level.

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

When the platform overruns the vehicle floor level and stops at an angle from 15-20 degrees, it is possible for a person in a wheelchair to tip over and for a standee to fall down.

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.

**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 introduced the S and K series, L-model wheelchair lift on or about March. The lift incorporated new electronics to better manage all required functions. On or about September 1, 2009, Ricon received a report of an incident involving a Ricon S-series, L-model lift, installed in a Champion bus, operated by Capital Metro Transit in Austin, Texas. The incident was caught on video. The video shows a passenger tipping over in her wheelchair as a result of the lift overrunning the vehicle floor level position. Ricon dispatched personnel to inspect the lifts and determined that a problem was present in the control system. This is the first and only reported incident of this type.

- 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 failure is not covered under 49 CFR 571.403

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.

- 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.**

Upon determining the problem, Ricon stopped all shipments of L-model lifts. A letter was prepared and emailed to all bus OEM's notifying of the interruption in supply.

Ricon believes that this condition is preventable by merely depressing the button down until the "UP" function is completed and the platform has reached the vehicle floor level. This was not a foreseeable failure.

The software code is in the process of being re-written. Once the software code is completed and the software is validated, the code will be made available to upgrade all L-model wheelchair lifts in service.

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

Remedied lifts:

- a) Update all Operator manuals to alert operators to depress the function buttons completely, until the selected function is completed and the lift comes to a stop.**
- b) The updated software will be installed.**
- c) Recalled lifts: the operational software allows the lift to overrun its selected function.**

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.

A remedy has not been determined. The software code is being re-written.

VI. Identify the Recall Schedule

VII.

- 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.**

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.

VIII. 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.

Attached for NHTSA review and approval.