

Safety Defect and Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Report

On April 12, 2010, Coach & Equipment Manufacturing Corp. [MFR] decided that a defect which relates to motor vehicle safety exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defects and Noncompliance Reports.

Date this report was prepared: June 10, 2010

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

1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent prescribed by 49 USC Section 30164. Coach & Equipment Manufacturing Corp.

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

Telephone number: (315) 536-2321 x 1214 Fax No: (315) 536-0460

Name and title of person who prepared this report:

Bryan D. Hickman
President

Signed:



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. George Person at (202) 366-5210, by Fax at (202) 366-7882;, or e-mail to RMD.ODI@dot.gov.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles involved in this Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle) provide:

Make(s): Coach & Equipment **Model Years Involved:** 2007 - 2010 **Model:** Phoenix

Vehicle Type: Shuttle Bus **Body style:** Cutaway chassis with steel body

Descriptive information which characterizes / distinguishes the recalled vehicles from those model vehicles not included in the recall: The recalled buses are equipped with wheel chair lifts manufactured by Ricon Corporation. Those buses without wheel chair lifts or with lifts from other manufacturers are not involved in this recall.

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: 30%

II. Identify the Recall Population

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

| Model | Years | Number of Vehicles Potentially Involved |
|--------------|--------------|--|
| Phoenix | 2007 - 2010 | 760 |

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 30% of all Phoenix buses manufactured have potentially affected Ricon lifts; unknown percentage of the buses with Ricon Lifts actually have the defect, which is the specific group being recalled.

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: We were notified by Ricon Corporation of the defects in their wheel chair lifts and the dates of manufacture of the potentially defective lifts. We used this information to search our purchasing records that identified the specific bus unit numbers that the defective lifts were purchased for and that became the recall population – all buses with potentially defective Ricon wheel chair lifts installed in them.

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 restraint belt on these wheel chair lifts was designed to prevent the lift from moving unless the tongue of the belt is fully engaged and latched in the buckle. Ricon has discovered that it is possible for the operator to insert the belt tongue into the buckle without fully engaging the latch mechanism. In this case, the restraint belt would appear to be latched and the operator could run the lift with a passenger on it in an unsafe condition.

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

Unknown to us whether the buckle and latch mechanism is defective, but it appears from Ricon's letter that the fear is mainly operator negligence in checking that the latch is properly secured.

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

If the restraint belt is not properly latched and if for some reason the passenger's wheel chair were to move and not be restrained, injury could result.

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

None, other than if someone notices it.

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

The wheel chair lifts were purchased from
Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

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

Daniel Mata, customer service
Oscar Pardinás, vice president sales and 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 be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

Ricon Corporation identified the defect in ways unknown to us. We learned of the defect when Ricon Corporation sent Coach & Equipment Manufacturing Corp. a letter telling us of the defect and asking us to identify the customers whose buses contain these lifts. This took some effort as our computer records do now show what lift went where so we had to dig through files by hand to identify the buses. Then, since the buses are sold through dealers, we had to get addresses and other contact information bus by bus from our dealers.

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.

V. 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 manufacture's notification of owners, purchasers and dealers, in accordance with section 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 section 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 submit one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with section 573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

All customers will provide all customers with a warning decal and a DVD-based training aid to promote a "Click and Tug" campaign, free of charge, Ricon may provide other point of use materials to raise the awareness of the Click and Tug campaign.

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.

As stated above.

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

No change in component itself is planned, but a warning decal will be applied on all lifts remedied.

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.

In production, Ricon is now installing warning decals.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturer's, dealers / retailers, and purchasers. Please identify any foreseeable problems with implementing the recall.

Ricon has offered to send out the letters to our customers on our behalf, having already cleared them with NHTSA. The letters to customers with Coach & Equipment buses started going out Tuesday, June 1, 2010. Coach & Equipment has only 2 dealers, both headquartered local to Coach & Equipment, with whom all the communications from Ricon have been shared in person.

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 and 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.

Ricon Corporation has already shared all its notices and bulletins with NHTSA regarding this recall, including the letters being sent out on behalf of the manufacturers of buses with their lifts installed.