



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

September 20, 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Brian Hickman
President
Coach & Equipment Manufacturing Corp.
P.O. Box 36
Penn Yan, NY 14527

NVS-215kjs
10V-262
10V-263
10V-264

Dear Mr. Hickman:

On May 28, 2010, June 9, 2010, and June 10, 2010, you notified the National Highway Traffic Safety Administration (NHTSA) that Coach & Equipment Manufacturing Corp. (Coach & Equipment) decided certain shuttle buses are defective due to a safety defect identified on some wheelchair lifts Ricon Corporation (Ricon) supplied and Coach & Equipment installed on those vehicles. As you are aware, Ricon has also notified NHTSA of the defect in the wheelchair lifts. See Ricon recall numbers 06E-008, 09E-060, and 09E-061.

You indicated in each of your notifications that Ricon would be assisting in helping you notify your owners and purchasers, would be performing the free remedy, and would be filing the requisite quarterly reports on your recall campaigns. We acknowledged your notifications and your recall campaign plans, and assigned recall campaign numbers 10V-262, 10V-263, and 10V-264. We reminded you in the acknowledgement letters that Coach & Equipment, as the manufacturer of the defective vehicle product, retained ultimate responsibility for notifying owners and remedying its vehicles regardless of whatever assurances Ricon had made to your company concerning its participation and management of your recall campaigns, including the owner notification and free remedy obligations.

To this date, we have no information or indication from Ricon that it has conducted a recall campaign for 10V-262, 10V-263, or 10V-264. We have repeatedly contacted Ricon concerning this troubling matter, and have not received a response. Accordingly, as the vehicle manufacturer and the party that bears ultimately responsibility for conducting a safety recall of its vehicle products, we must ask that you fulfill your recall obligations and issue owner notification letters to your owners and purchasers and conduct free remedy campaigns on your vehicles.

According to our records, we approved draft owner letters for each of Coach & Equipment's three recall campaigns on June 16, 2010. You may use those letters to notify owners of your vehicles. Please advise us as to when you expect to start your notifications and what your remedy plans are. Once you have notified owners, you must submit a representative copy of the letters (one copy for each recall campaign) to us at RMD.ODI@dot.gov, by facsimile on (202) 366-7882, or by any other means by which you can demonstrate its receipt by our office. Also, please be reminded that Coach & Equipment must file six, quarterly reports on the progress of these campaigns.

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within 30 days after the close of the calendar quarter in which Coach & Equipment first mails its owner notification letters. Thereafter, quarterly reports will be due on or before 30 days after the close of the calendar quarter.

Should you have any questions or concerns, please contact Kelly Schuler at (202) 366-5227.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jennifer T. Timian". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke at the end.

Jennifer T. Timian
Acting Chief
Recall Management Division