



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

Ms. Janet Kercher-Dudley
Standards Engineer
Turtle Top
67819 State Road 15
New Paris, In 46553

NVS-215kjs
10V-353
10V-354

Dear Ms. Kercher-Dudley:

On July 23, 2010, you notified the National Highway Traffic Safety Administration (NHTSA) that Turtle Top decided certain model year 2007 through 2010 transit and shuttle buses are defective due to a safety defect identified on some wheelchair lifts Ricon Corporation (Ricon) supplied and Turtle Top installed on those vehicles. As you are aware, Ricon has also notified NHTSA of the defect in the wheelchair lifts. See Ricon recall numbers 09E-060 and 09E-061.

You indicated in your 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-353 and 10V-354.

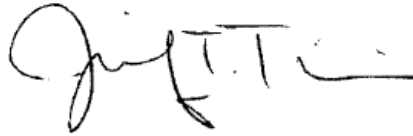
To this date, we have no information or indication from Ricon that it has conducted a recall campaign for either 10V-353 or 10V-354. We have repeatedly contacted Ricon concerning this troubling matter, and have not received a response. Accordingly, as the vehicle manufacturer and the party that bears 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 Turtle Top's recall campaigns on August 5, 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 for each 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 Turtle Top 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 Turtle Top first mails its owner notification letters. Thereafter, quarterly reports will be due on or before 30 days after 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 the first name being the most prominent.

Jennifer T. Timian
Acting Chief
Recall Management Division