



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

November 2, 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

NVS-215kjs
10V-400

Dear Ms. Kercher-Dudley:

Turtle Top is requested, pursuant to 49 U.S.C. 30165, 30166, and 30119, to renotify owners involved in safety recall 10V-400 who have not had their vehicles corrected or otherwise accounted for. This recall involves 36 MY 2005 through 2009 Spirit (MFSAB Terra Transport) multi-function school activity buses manufactured from October 27, 2004 through July 31, 2009, equipped with Freedman seating company seat restraint barriers. In Turtle Top's fifth reporting quarter, Turtle Top reports that of the 36 vehicles involved, 30 have not been remedied.

Turtle Top should conduct the owner renotification in accordance with the guidelines listed below.

- Before conducting the owner renotification, Turtle Top should obtain an updated owner list, for this recall campaign, based on current state motor vehicle registration records.
- Turtle Top's proposed owner renotification letter for this recall must meet the requirements of 49 CFR Part 577.10, "Follow-up Notification," and must be submitted to NHTSA for review before owner renotification begins. Part 577.10(e)(1) specifically requires that the renotification letter be identified as a "... follow-up to an earlier communication."
- In addition to the six quarterly status reports required under 49 CFR Part 573.6, "Quarterly Reports," Turtle Top is requested to file three additional quarterly status reports.

- Furnish a proposed schedule for conducting the owner renotification that includes the following information:
 - a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
 - b. the approximate date on which the revised owner list will be available to initiate owner renotification;
 - c. the approximate date on which the owner renotification will begin; and
 - d. the approximate date on which the owner renotification will be completed (if the owner renotification is to be staggered, give the beginning and ending owner renotification date for each segment).

Turtle Top's renotification schedule and a draft of the proposed owner renotification letter must be submitted to this office by November [need date], 2011.

If you have any questions concerning this matter, please contact Josh Neff at (202) 366-0698, Joshua.neff@dot.gov or Kelly Schuler at (202) 366-5227, Kelly.schuler@dot.gov or by fax at (202) 366-7882.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Willard", with a large, sweeping flourish at the end.

Ric Willard
Acting Chief, Recall Management Division
Office of Defects Investigation
Enforcement