



January 19, 2012

**VIA CERTIFIED MAIL AND E-MAIL RMD.ODI@DOT.GOV**

12V-021  
(3 Pages)

Attn: Recall Management Division (NVS-215)  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: Part 573 Noncompliance Information Report**

Ladies and Gentlemen:

In accordance with the requirements of the National Traffic and Motor Vehicle Safety Act, as amended (the "Act") and 49 C.F.R. Part 573, on behalf of Morgan Olson, LLC ("Morgan Olson"), we hereby submit the attached **Noncompliance Information Report** prepared on January 19, 2012.

This Report concerns the door locks and door retention components addressed in 49 C.F.R. Part 571.206. It was prepared by Mr. David Andree, Vice President of Engineering.

In accordance with 49 C.F.R. Part 556, Morgan Olson plans to petition the NHTSA for an exemption from the notification and remedy requirements of the Act due to the inconsequentiality of the noncompliance.

Should you have any questions about this Report, please contact Mr. Andree at 269-659-0311 (tele); 269-651-4259 (fax); Morgan Olson, LLC, 1801 S. Nottawa St., Sturgis, MI 49091; and david.andree@morganolson.com.

Sincerely,

*Phillip M. Ownbey*

MORGAN OLSON, LLC

By: Phillip M. Ownbey  
Its: President & Chief Operating Officer

Morgan Olson  
1801 S. Nottawa Street  
Sturgis, MI 49091  
Phone: 269-659-0200

# Noncompliance Information Report

January 19, 2012

## Vehicle Manufacturer's Name:

Morgan Olson, LLC  
1801 S. Nottawa St.  
Sturgis, MI 49091

## Identification of Affected U.S. Bound Vehicles:

Based on our production records, we have determined the affected population of U.S. bound vehicles is as follows:

Body Style or Type	Date(s) of Manufacture By Month and Year	Manufacturer	Gross Vehicle Weight	VIN
Walk-in Van-type Vehicle	Sept. 1, 2009 to the present	Morgan Olson, LLC	Greater than 4,536 kg. or 10,000 lbs.	

## Total Number of Vehicles Potentially Affected:

6430.

## Estimated Percentage of Noncompliant Vehicles:

100% of vehicles above 4,536 kg. GVWR except as noted below in "Description of Noncompliance."

## Description of Noncompliance:

Most vehicles above 4,536 kg GVWR with sliding front side doors do not have either (a) a primary latch system, or (b) a door closure warning system, as defined in 49 C.F.R. Part 571.206.

Prior to September 1, 2009, there were no requirements for a primary latch system or a door closure warning system on sliding front side doors in 49 C.F.R. Part 571.206. When the language in section S2 was amended to add "*and buses with a gross vehicle weight rating (GVWR) of 4,536 kg or less,*" it was interpreted to mean that all vehicles above 4,536 kg GVWR

were exempted from the standard. On September 1, 2009, Morgan Olson began installing door closure warning systems on all vehicles with a GVWR of 4,536 kg or less. On vehicles above 4,536 kg GVWR, door closure warning systems were only installed on those vehicles where the customer specifically requested one. The majority of vehicles produced by Morgan Olson with sliding front side doors, above 4,536 kg GVWR, after September 1, 2009, in model years 2009, 2010 and 2011, do not comply with the requirements for either a primary latch system or a door closure warning system.

**Chronology:**

Upon receiving information from another walk-in van manufacturer, Morgan Olson reassessed their interpretation of 49 C.F.R. Part 571.206 and concluded on Wednesday, January 11, 2012 that there was a potential noncompliance with the standard.

**Remedies:**

Morgan Olson believes that, although its noncompliance with Part 571 constitutes at best a technical noncompliance, it is inconsequential as it relates to motor vehicle safety, because if either sliding front side door becomes open, such is immediately apparent to the driver. Therefore, Morgan Olson plans to petition for an exemption from the notification and remedy requirements of the Act.

Morgan Olson has stopped shipment of vehicles above 4,536 kg GVWR pending the development of a compliant solution. Morgan Olson also will take any other actions that are required by law pending NHTSA's response to its petition and the resolution of same.

**Recalls:**

A recall schedule is pending the NHTSA's response to the petition for exemption and the resolution of same.

Prepared by:



David Andree

Vice President for Engineering