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September 19, 2012

12V-021
(3 pages) - Amended

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

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

Re: Campaign No. 12V-021; Supplement to 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 **Supplement to Noncompliance Information Report** prepared on September 19, 2012.

This Report concerns certain Morgan Olson vehicles manufactured between September 1, 2009 and January 19, 2012 that did not have either (a) a primary latch system, or (b) a door closure warning system, as defined in Federal Motor Vehicle Safety Standard No. 206 ("FMVSS 206"). It was prepared by Mr. Greg Hersberger, Morgan Olson's Warranty and Service Manager.

Should you have any questions about this Report, please contact Mr. Hersberger at Morgan Olson, LLC, 1801 S. Nottawa St., Sturgis, MI, 49091; phone: 269-659-0374; fax: 269-659-0272 and e-mail address: greg.hersberger@morganolson.com.

Sincerely,

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



**Supplement to Noncompliance Information Report
Campaign No. 12V-021
September 19, 2012**

Vehicle Manufacturer:

Morgan Olson, LLC

Identification of Affected Vehicles:

Based on our production records, we have determined the affected population of 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 January 19 th 2012	Morgan Olson, LLC	Greater than 4,536 kg or 10,000 lbs.	See Attachment "A"

Total Number of Vehicles Potentially Affected:

7853. Please note that the number of potentially affected vehicles has been revised from the initial estimate of 6430 vehicles.

Estimated Percentage of Noncompliant Vehicles:

Approximately 90% of walk-in vans above 4,536 kg. GVWR manufactured by Morgan Olson between September 1, 2009 and January 19, 2012 are currently non-compliant. However, as part of Recall Campaign US 12V-045 (See background below), the owners of 10% of these vehicles have now received compliant parts (i.e., a secondary latch system) and Technical Service Bulletin 11-11 (attached) which includes instructions as to their installation.

Description of Defect and Consequences:

Approximately 100% of the walk-in vans above 4,536 kg GVWR with sliding front side doors as originally manufactured by Morgan Olson did not have either (a) a primary latch system, or (b) a door closure warning system, as defined in Federal Motor Vehicle Safety Standard No. 206 ("FMVSS 206"), unless a customer specifically requested installation of same.

Since the mandatory compliance date of September 1, 2009, Morgan Olson operated with the understanding that FMVSS 206 S4.2.1 requirements for a primary latch system or a door closure warning system applied only to vehicles with a gross vehicle weight rating (GVWR) of 4,536 kg or less. Accordingly, it was incorrectly understood that all vehicles above 4,536 kg GVWR were exempted from FMVSS 206.

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, however, door closure warning systems were only installed on those vehicles where the customer specifically requested one. Thus, the majority of the walk-in vans produced by Morgan Olson

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with sliding front side doors, above 4,536 kg GVWR, from September 1, 2009 to January 19, 2012, did not comply with the requirements for either a primary latch system or a door closure warning system.

Background:

Morgan Olson submitted its initial Noncompliance Information Report in Campaign No. 12V-021 on January 19, 2012. Shortly thereafter, Morgan Olson petitioned the agency to exempt it from the notice and remedy requirements of the Federal Motor Vehicle Safety Act.

Morgan Olson's Petition for Inconsequential Noncompliance was denied on September 13, 2012 and Morgan Olson was instructed to submit an amended report. This Supplement is intended to address these instructions.

It is important to note that while the Petition for Inconsequential Noncompliance was pending before NHTSA, Morgan Olson also was carrying out Campaign No. 12V-045 regarding the door latches' failure to meet the strength tests provided by FMVSS 206. Since Campaign No. 12V-045 and the current matter involved many of the same vehicles, Morgan Olson began shipping secondary latch systems to its customers in order to correct this defect along with the parts necessary to correct the defect addressed in Campaign 12V-045.

Specifically, the Technical Service Bulletin sent to Morgan Olson's customers addresses *both* Campaigns. The Bulletin states: "**Concern:** Door inner mechanisms don't meet Federal Strength Requirements and **Door needs Secondary Latch**" and further notes "**Corrective Action:** Replace Existing mechanism with new mechanism **and add secondary latch to existing latch all supplied by Morgan Olson.**"

As shown on the attached spreadsheet, the owners of 94% of the affected vehicles have at this time received notice of this defect (along with the notice of the defect at issue in Campaign No. 12V-045). Furthermore, owners of 73% of the affected vehicles have returned the card enclosed with the notice confirming that they have received notice. Of those who have confirmed receiving notice, the owners of approximately 10% of the vehicles to date have been sent compliant parts and instructions for their installation.

Remedies:

Morgan Olson began shipping compliant door latch systems (i.e., secondary latch systems) on April 2, 2012 along with a copy of the Technical Service Bulletin which includes installation instructions. The secondary latch system will bring the door latches on walk-in vans within the definition of "primary latch system" in FMVSS 206.

When the customer completes installation of the secondary latch system, they are instructed to send Morgan Olson an invoice for reimbursement as detailed in the Technical Service Bulletin.

Morgan Olson plans to carry out this recall campaign concurrent with Campaign 12V-045 and will send additional notices via mail on or about October 1, 2012 and January 31, 2013 to any customers who have not responded to the April 2012 notice. Morgan Olson anticipates shipping compliant secondary latch systems to any customers who have returned the cards enclosed with these notices within 30 days.

Prepared by:



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Warranty and Service Manager

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