MORGAN OLSON

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February 2, 2012

12V-045
(5 pages)

VIA CERTIFIED MAIL AND E-MAIL 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: 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 February 2, 2012.

This Report concerns the sliding door latch testing requirements addressed in 49 C.F.R. Part 571.206 S4.2.1.1(a). It was prepared by Mr. David Andree, Vice President of Engineering.

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

Sincerely,

MORGAN OLSON, LLC

Phillip M Ownbey

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

February 2, 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	Model Years Affected	VIN
Walk-in Van-type Vehicle	Sept. 1, 2009 to the present	Morgan Olson, LLC	2009, 2010, 2011, 2012	See Attachment "A."

Total Number of Vehicles Potentially Affected:

8316.

Estimated Percentage of Noncompliant Vehicles:

100% of vehicles built as of September of 2009 are subject to this noncompliance.

Description of Noncompliance:

Vehicles with sliding front side doors contain sliding door latches that recently failed to pass the testing requirements set out in 49 C.F.R. Part 571.206, S4.2.1.1(a).

To comply with FMVSS 206 S4.2.1.1(a) that became effective September 1, 2009, Morgan Olson contracted with Cleveland Hardware and Forging Company to supply door latches advertised to be FMVSS 206 compliant. Following the recent discovery of noncompliance with FMVSS 206 primary latch system and door closure warning system requirements, Morgan Olson asked Cleveland Hardware to re-test the latches' compliance with FMVSS 206 strength requirements. The tests were carried out by a third party on January 26,

2012 and were provided to Morgan Olson on January 27, 2012. The tests showed a failure 5 out of 6 times. A copy of these test results, dated January 26, 2012, are attached hereto as Attachment "B."

Chronology:

Upon discovering that certain vehicles were not compliant with primary latch system and door closure warning system requirements of FMVSS 206, Morgan Olson requested its supplier to test the strength requirements of its latches. Morgan Olson was informed that the latches failed to comply with FMVSS 206 S4.2.1.1(a) on Thursday, January 26, 2012.

Remedies:

Morgan Olson has stopped shipment of vehicles containing the defective latches and has obtained an alternative supplier of compliant latches. Morgan Olson also will take any other actions that are required by law.

Prepared by:

David Andree
Vice President for Engineering

MORGAN OLSON

Noncompliance Information Report

Morgan Olson, LLC

Attachment "B"

February 2, 2012

A DIVISION OF T. ADAMS CO., INC.
1520 WILLOW PARKWAY
CLEVELAND, OHIO 44125
PHONE (216) 641-3290
FAX (216) 641-1223
www.tensile.com

TTML TENSILE TESTING METALLURGICAL LABORATORY

CERTIFIED TEST REPORT

Cleveland Hardware & Forging
3270 East 79th Street
Cleveland OH 44104

Job No.: B2-026-385
Date: 1-26-12
Cust. PO#: Verbal - K. Maloney

Description: 6 samples DWG. Part# 1113014

TEST RESULTS

	Ultimate, lbs
Customer Req. (Min.):	2,500
	2,531
	2,193
	2,341
	2,449
	2,074
	2,254

Test Method: ASTM A370-11

The above **Does Not Conform** to requirement listed.

Authorized Agent

ACCREDITED Testing Cert #0161