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National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
West Building
Washington DC 20590

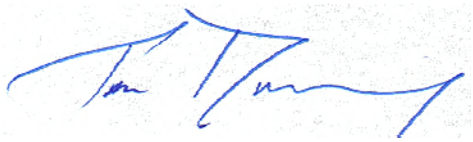
March 13, 2012

Attention: Joshua Neff and/or Kelly Schuler

In accordance with CFR 49 Part 573, Transportation Collaborative Inc has decided that non-compliance exists which relates to Federal Motor Vehicle Safety Standard No. FMVSS No. 210; "*Seat Belt Assembly Anchorages*".

This report was e-mailed to NHTSA on March 13, 2012 to KellySchuler@dot.gov , Joshua.Neff@dot.gov, and RMD.ODI@dot.gov. In addition, a physical copy has been sent, via UPS. If there are any questions regarding the information I have submitted, please contact me at 845-988-2333.

Respectfully,



Timothy Downey
Standards & Compliance
TransTech Bus a TCI Company

PART 573 Defects and Noncompliance Report
Revision: A

Report Date: March 05, 2012

I.

Transportation Collaborative Inc has decided that non-compliance exists on certain TransTech Horizon Bus Models, manufactured on Ford E350 or E450 Econoline chassis.

The non-compliance involves Federal Motor Vehicle Safety Standard No. 210 *"Seat Belt Assembly Anchorages"*. Specifically, the shoulder restraint portion of the driver's seatbelt may have a nut which failed to meet Ford IVM torque standards, and FMVSS No.210 standards which require that the "*A Type 2 seat belt assembly shall provide upper torso restraint*".

Vehicles not involved in the recall:
TransTech Horizon Bus Models, manufactured on Ford E350 or E450 Econoline chassis, not equipped with a molded fiberglass B-Pillar cover, as supplied by TransTech Bus. Or units of this model configuration that were manufactured after February 24, 2012.

Vehicles involved in the recall:
TransTech Horizon Bus Models, manufactured on Ford E350 or E450 Econoline chassis, equipped with a fiberglass B-pillar cover, as supplied by TransTech Bus. Or units of this model configuration that were manufactured before February 24, 2012.

Approximate percentage of the total of vehicles estimated to actually contain the non-compliance:
100%

Vehicle population as of February 29, 2012:

Model	Year	Number of Vehicles involved
Horizon	2011	2

Total: 2

Identify and describe how the original recall population was determined:

February 24, 2012 -
TransTech Bus was informed that a TransTech SST School Bus Model, manufactured on an E450 Econoline chassis (VIN: 1FDFEFL1BDB23723) was in operation at Tom's River School District in Tom's River, NJ. The vehicle was involved in an accident and suffered damage to both the exterior and the interior.

February 25, 2012 –
Our internal investigation begins to seek the root cause of the non-compliance.

February 26, 2012 –
Our internal investigation determined that the fiberglass panel used in the installation of the Ford SST units was the reason for the non-compliance. After reviewing purchase orders and cross-referencing them with production records of vehicles manufactured, we were able to determine that the fiberglass was installed in thirteen TransTech Bus units.

II.

Describe the Non-compliance:
The noncompliance involves FMVSS No. 210 *"Seat belt assembly and anchorage"* paragraphs S4.2.2 "Except as provided in S4.2.5, and except for side facing seats, the anchorages, attachment hardware, and attachment bolts for any of the following seat belt assemblies shall withstand a 3,000 pound force applied to the lap belt portion of the seat belt assembly simultaneously with a 3,000 pound force applied to the shoulder belt portion of the seat belt assembly, when tested in accordance with S5.2 of this standard**".** However, the maximum loads achieved during the accident were not measurable. What is known is that the fiberglass panel, when installed, did not meet design specifications. The variance from TransTech Bus dimensions/specifications that this panel experienced directly caused the insufficient torque values present at the Upper Torso Seatbelt Mounting point.

Describe the consequence of the Non-compliance:
In the event of a vehicle collision, the shoulder restraint portion of the driver's seatbelt could detach from the B-pillar anchorage; this could result in personal injury to the occupant.

Identify any warning, which can (A) Precede or (B) Occur:
There is no warning that would precede a seat attachment failure, physical inspection is required.

III.

With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the non-compliance was determined:

***February* 27, 2012** - Initial investigations on this unit have shown that the performance requirements of Federal Motor Vehicle Safety Standard No. 210 *"Seat belt assembly and anchorage"* were not met. Transportation Collaborative Inc. subsequently determined that the bolt used to secure the driver' torso seatbelt to the b-pillar mount was not at an acceptable torque value.

February 29, 2012 - The National Highway Traffic Safety Administration was notified by Trans Tech Bus via e-mail to Kelly Schuler & Joshua Neff regarding the non-compliance.

Identify the remedy:

Transportation Collaborative Inc will notify the owners of the affected vehicles and dealers that sold the vehicles. Customers and dealers will be required to inspect and remedy vehicles that are affected by the non-compliance with FMVS No. 210 "*Seat belt assembly anchorages"*. The inspection process for this recall begins by removing the Ford OEM plastic cover that is covering the nut. Once removed by lifting and "popping" this plastic component off, you will see the OEM nut that fastens the belt assembly to the B-Pillar. Taking a torque wrench, measure the value of the nut in ft-lbs. If out of the 54.2 ft-lbs ± 8.1 ft-lbs range, immediately begin with the next step of remedying the non-compliance.

The remedy for this recall is the modification of the incorrect fiberglass and an inspection for the torque value at the torso seatbelt mounting point. The fiberglass panel must have an square cutout measuring 8"x3.25" centered on the Ford OEM mounting bracket. Subsequently, a torque wrench must be used to properly torque the OEM nut to the torso seatbelt assembly. The proper torque range as specified by Ford Motor Company is 40 N*m ± 6 N*m. Transportation Collaborative Inc. will provide customers, dealers and or any authorized repair facility with any repair kits needed at no cost. Customers will be supplied with instructions on how to inspect and repair any affected seat belt anchorages. Transportation Collaborative Inc. will assist all customers with scheduling repairs and locating authorized repair facilities.

Any cost incurred to the owners, purchasers and dealers of Vehicles affected by this recall number will be reimbursed by Transportation Collaborative Inc. within a reasonable time of the notifications. Transportation Collaborative Inc. reimburses customers and dealers within 30 days of the remedy.

Recall Schedule:
Upon approval of this report, Transportation Collaborative Inc. will begin to notify customers by issuing Notification letters to the dealers and customers along with inspection/ installation instructions. This scheduled mailing will occur no later than March 19, 2012.

All questions regarding this recall should be addressed to:

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7 Lake Station Road
Warwick, New York 10990
Phone# 845-988-0419 Fax# 845-988-0324

Prepared by: Timothy Downey, Standards & Compliance, TransTech Bus

Signature: _____ **Date**: 03/13/12