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August 30, 2012

**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: Part 573 Noncompliance Information Report

Ladies and Gentlemen:

On July 31, 2012, Morgan Olson filed a Part 573 Defect and Noncompliance Information Report with NHTSA in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

We filed this report after we tentatively determined that a noncompliance with certain Federal Motor Vehicle Safety standards may exist in a group of 24 vehicles, owned by one customer. Both the original and new vehicle identification numbers for those vehicles were provided in an attachment to the July 31 report.

For the subject 24 vehicles, Morgan Olson remounted a used truck body onto a new chassis; our concern was that the completed vehicles might not have been compliant with all safety standards in effect at the time of the remount.

Since our initial report to NHTSA on July 31 we have fully investigated both the applicable safety standards and the current condition of the 24 vehicles, and have formulated a plan to assure full compliance. In this update to our original report we will provide both our findings and the course of action we are pursuing to insure compliance.

**Review Criterion**

Starting with the FMVSS standards in effect at the time the vehicle was originally produced, and referencing the new standards in effect at the time Morgan Olson performed the remount, we developed a list of vehicle check-points to review. This provided a guide for the review of specific areas of each of the 24 trucks, and allowed us to build a list of issues to address on each truck.

**Inspection**

On August 15 we met with representatives of the owner of the 24 trucks at their vehicle maintenance facility in Chicago and inspected each vehicle for compliance with FMVSS standards. A short list of inconsistencies was compiled for each vehicle.

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### Findings

Most of the vehicles had been in service delivering goods for a period of months or years since Morgan Olson remounted the body, and all showed signs of routine wear and tear. Our investigation found instances of non-compliance that fell into three general categories: 1) items that Morgan Olson will correct, such as a lack of illumination of dash controls or lack of a Morgan Olson certification label (those items are listed on a separate attachment filed with this letter); 2) items that were correct at the time the remounted vehicle was presented to the customer but that have fallen out of compliance through normal use of the vehicle in the course of business (such as rear lamps found to be not properly seated in their grommets); and 3) items that were correct at the time the remounted vehicle was presented to the customer but have been changed or replaced by the customer since that time (for example, replacement of glass broken by the customer).

### Our Corrective Action Plan

For items listed in #1 above, Morgan Olson will provide all parts and labor to install the appropriate corrections to the vehicle. This will be performed at the customer's fleet maintenance yard by Morgan Olson personnel at the customer's convenience. A separate attachment details those items by vehicle identification number.

For items in #2 above, Morgan Olson will communicate its concern regarding specific inconsistencies along with manufacturing records of the work originally performed and our recommendation on service or maintenance work that should be performed by the customer to bring the vehicle back into compliance.

For items in #3 above, Morgan Olson will communicate the problem areas identified to the customer and review the customer's maintenance logs to confirm that routine maintenance has been performed that has caused the vehicle to be out of compliance.

We are allocating all necessary manpower and resources towards this corrective action plan, and we are working closely with our customer to insure both their satisfaction and our compliance with Federal regulations. We anticipate sourcing needed parts within the next 15 days and completing the required adjustments shortly thereafter.

This report is filed consistent with our requirements under 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports and is intended to update NHTSA on our approach to and progress on the potential non-compliances listed in our July 31 filing. We will provide a further update with additional information on our progress within 30 days. In the meantime, please let me know if you have questions or if I can be of service.

Sincerely,



David Andree  
Vice President of Engineering  
Morgan Olson, LLC

# Attachment I

1. 1FCJE39L3VHA62974  
1FCJE39L09DA63447
  - No illumination of wiper/washer control (FMVSS 101)
  - No front reflex reflectors on sides (FMVSS 108)
  - No rear reflex reflectors on back (FMVSS 108)
  - No Morgan Olson certification label (49 CFR 567)
  
2. 1FCJE39Y6PHB30943  
1FCJE39L29DA82680
  - No illumination of wiper/washer control (FMVSS 101)
  - Missing front right-side reflex reflector (FMVSS 108)
  - No reflex reflectors on back (FMVSS 108)
  - No Morgan Olson certification label (49 CFR 567)
  
3. 1FCJE39H2SHB97354  
1FC2E3KL2ADA09490
  - No front reflex reflectors (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 101)
  - No Morgan Olson certification label (49 CFR 567)
  
4. 1FCJE39L7VHA62976  
1FC2E3KL7ADA12093
  - No illumination of wiper/washer control (FMVSS 101)
  - Missing all reflex reflectors (FMVSS 108)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
5. 1FCJE39H1THA99126 (DUPLICATE VIN)  
1FC2E3KL0ADA48126 or 1FC2E3KL0ADA89954
  - No illumination of wiper/washer control (FMVSS 101)
  - Washer/wiper control is upside-down when in off position (FMVSS 101)
  - Washer system is inoperative (FMVSS 104)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
6. 1FCJE39HRHA08061  
1FC2E3KL4ADA58724
  - No illumination of wiper/washer control (FMVSS 101)
  - Windshield defroster/defogger is inoperative (FMVSS 103)
  - No Morgan Olson certification label (49 CFR 567)
  
7. 1FCJE39L5VHA62975 (DUPLICATE VIN)  
1FC2E3KL8ADA75946
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)

8. 1FCJE39H1THA99126 (DUPLICATE VIN)  
1FC2E3KL0ADA48126 or 1FC2E3KL0ADA89954
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
9. 1FCJE39L5VHA62975 (DUPLICATE VIN)  
1FCJE39L8XHC14301
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
10. 1FCJE39L1VHA62973  
1FC2E3KL0BDA37113
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
11. 1FCJE39L7XHA28040  
1FC2E3KL4BDA43061
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
12. 1FCJE39L3XHA28049  
1FC2E3KL6BDA43062
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
13. 1FCJE39L8WHC16080  
1FC2E3KL6BDA71525
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
14. 1FCJE39L0XHA28042  
1FC2E3KL4BDA71524
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
15. 1FCJE39L2YHB64223  
1FC2E3KL0BDA90958
  - Totaled (Scraped)

16. 1FCJE39LXYHB64227  
1FC2E3KL2BDA97118
  - No symbol or text for wiper/washer control (FMVSS 101)
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
17. 1FCJE39L1XHB28048  
1FC2E3KL1BDB17925
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
18. 1FCJE39L1XHC14303  
1FC2E3KL1BDB17926
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
19. 1FCJE39L4XHA28044  
1FC2E3KL5BDB17927
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
20. 1FCJE39L6XHA28045  
1FC2E3KL9BDB17929
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)
  
21. 1FCJE39L4YHB64224  
1FC2E3KL5BDB17930
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 205)
  - No Morgan Olson certification label (49 CFR 567)
  
22. 1FCJE39L1YHB64231  
1FC2E3KL7BDB17931
  - No illumination of wiper/washer control (FMVSS 101)
  - No double door latch or door ajar light (FMVSS 206)
  - No Morgan Olson certification label (49 CFR 567)

23. 1FCJE39L1WHC16079  
1FC2E3KL9BDB17932

- No illumination of wiper/washer control (FMVSS 101)
- No double door latch or door ajar light (FMVSS 206)
- No Morgan Olson certification label (49 CFR 567)

24. 1FCJE39L1YGB64228  
1FC2E3KL0BDB17933

- No illumination of wiper/washer control (FMVSS 101)
- No double door latch or door ajar light (FMVSS 206)
- No Morgan Olson certification label (49 CFR 567)