



July 31, 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:

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 July 31, 2012.

Morgan Olson, LLC is a final stage manufacturer of new walk-in van bodies on incomplete vehicle chassis supplied to it by its customers. As part of its business, we also perform body repair work to used vehicles. In addition, some customers request that we install new power train components in existing vehicles as part of the repair or refurbishment work.

Between June 1, 2009 and July 11, 2012, the Morgan Olson service department performed body exchanges for vehicles, whereby the service department mounted the body of a used vehicle onto a new chassis. Morgan Olson is concerned that some of the vehicles that underwent body exchanges may not be compliant with certain safety standards in effect when the body exchanges occurred. We have recently learned that some work which we considered to be repair work at the time it was done may require us to verify certification compliance for the vehicle under NHTSA regulations, and are writing to inform NHTSA of the issue and our plans to address it.

Accordingly, Morgan Olson is investigating whether there are any non-compliant vehicles as a result of these repairs and/or body exchanges and, if so, which safety standards may not have been complied with. Due to the pendency of its investigation, Morgan Olson is supplying a Noncompliance Information Report with a list of all vehicles potentially noncompliant with one or more safety standards. In addition, Morgan Olson believes that, in 30 days, it will have completed its investigation as to whether defects exist and, if so, which defects exist.

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

Part 573 Defect and Noncompliance Information Report

On July 11, 2012, Morgan Olson, LLC tentatively determined that a noncompliance with certain Federal Motor Vehicle Safety standards may exist in the motor vehicles listed in Attachment A. Morgan Olson is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports. Morgan Olson is investigating which safety standards, if any, the affected vehicles are not compliant with. Morgan Olson will supplement this Report as more information becomes available to it.

Date this report was prepared: July 31, 2012.

Manufacturer's identification code for this recall: N/A.

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. § 30164.

Morgan Olson, LLC

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

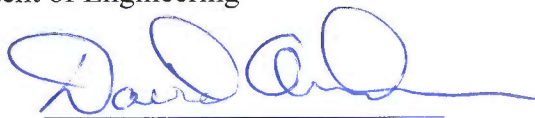
David Andree
Vice President of Engineering

Telephone Number: 269-659-0311 **Fax No.:** 269-659-0444

Name and Title of Person who prepared this report:

David Andree
Vice President of Engineering

Signed:



David Andree

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

See Attached Spreadsheet

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles manufactured during that time period.

100%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

<u>Model</u>	<u>Year</u>	<u>Vehicle Number Involved</u>
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See Attached Spreadsheet

Total Number Potentially Affected by the Recall: 24

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance:

TBD

Identify and describe how the recall population was determined---in particular how the recalled models were selected and the basis for beginning and final dates of manufacture of the recalled vehicles:

Between June 1, 2009 and July 11, 2012, Morgan Olson's service department performed body exchanges for vehicles, whereby the service department mounted the body of a used vehicle onto a new chassis. Morgan Olson is concerned that some of the vehicles that underwent body exchanges may not be compliant with certain safety standards in effect when the body exchanges occurred.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

See 4 above.

Describe the cause(s) of the defect or noncompliance condition.

See 4 above.

Describe the consequence(s) of the defect or noncompliance condition.

Unknown at this time

Identify any warning which can (a) precede or (b) occur.

N/A

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

N/A

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

N/A

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

Morgan Olson recently learned on July 11, 2012 that some of the vehicles that underwent body exchanges through its service department may not be compliant with certain safety standards in effect at the time of the body exchanges. Morgan Olson is still attempting to determine whether the body exchanges on these vehicles may have resulted in any non-compliance, which exchanges in fact did give rise to a noncompliance, and, if so, which particular safety standards may not have been complied with.

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

N/A

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with § 573.13 of this pat. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by § 573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with § 573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

If it is determined that Morgan Olson has violated any applicable safety standards, Morgan Olson will initiate a recall campaign and correct any defects in accordance with the law.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

All remounted vehicles produced by Morgan Olson effective July 26 2012 have been inspected and corrected to meet all FMVSS current requirements.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

Attachment

#	Date of Work	Old VIN	ModelYear	New VIN	ModelYear	GVWR	Vehicle Type
1	6/30/09	1FCJE39L3VHA62974	1997	1FCJE39L09DA63447	2009	Over 10K lbs	Walk-in Truck
2	8/17/09	1FCJE39Y6PHB30943	1993	1FCJE39L29DA82680	2009	Over 10K lbs	Walk-in Truck
3	12/11/09	1FCJE39H2SHB97354	1995	1FC2E3KL2ADA09490	2010	Over 10K lbs	Walk-in Truck
4	2/16/10	1FCJE39L7VHA62976	1997	1FC2E3KL7ADA12093	2010	Over 10K lbs	Walk-in Truck
5	3/23/10	1FCJE39H1THA99126	1996	1FC2E3KL0ADA48126	2010	Over 10K lbs	Walk-in Truck
6	4/1/10	1FCJE39HRHA08061	1994	1FC2E3KL4ADA58724	2010	Over 10K lbs	Walk-in Truck
7	7/2/10	1FCJE39L5VHA62975	1997	1FC2E3KL8ADA75946	2010	Over 10K lbs	Walk-in Truck
8	8/16/10	1FCJE39H1THA99126	1996	1FC2E3KL0ADA89954	2010	Over 10K lbs	Walk-in Truck
9	12/29/10	1FCJE39L5VHA62975	1997			Over 10K lbs	Walk-in Truck
10	12/30/10	1FCJE39L1VHA62973	1997	1FC2E3KL0BDA37113	2011	Over 10K lbs	Walk-in Truck
11	1/28/11	1FCJE39L7XHA28040	1999	1FC2E3KL4BDA43061	2011	Over 10K lbs	Walk-in Truck
12	2/28/11	1FCJE39L3XHA28049	1999	1FC2E3KL6BDA43062	2011	Over 10K lbs	Walk-in Truck
13	3/31/11	1FCJE39L8WHC16080	1998	1FC2E3KL6BDA71525	2011	Over 10K lbs	Walk-in Truck
14	4/1/11	1FCJE39L0XHA28042	1999	1FC2E3KL4BDA71524	2011	Over 10K lbs	Walk-in Truck
15	5/5/11	1FCJE39L2YHB64223	2000	1FC2E3KL0BDA90958	2011	Over 10K lbs	Walk-in Truck
16	6/29/11	1FCJE39LXYHB64227	2000	1FC2E3KL2BDA97118	2011	Over 10K lbs	Walk-in Truck
17	10/26/11	1FCJE39L1XHB28048	1999	1FC2E3KL1BDB17925	2011	Over 10K lbs	Walk-in Truck
18	9/19/11	1FCJE39L1XHC14303	1999	1FC2E3KL1BDB17926	2011	Over 10K lbs	Walk-in Truck
19	11/3/11	1FCJE39L4XHA28044	1999	1FC2E3KL5BDB17927	2011	Over 10K lbs	Walk-in Truck
20	2/21/12	1FCJE39L6XHA28045	1999	1FC2E3KL9BDB17929	2011	Over 10K lbs	Walk-in Truck
21	3/29/12	1FCJE39L4YHB64224	2000	1FC2E3KL5BDB17930	2011	Over 10K lbs	Walk-in Truck
22	4/1/12	1FCJE39L1YHB64231	2000	1FC2E3KL7BDB17931	2011	Over 10K lbs	Walk-in Truck
23	5/25/12	1FCJE39L1WHC16079	1998	1FC2E3KL9BDB17932	2011	Over 10K lbs	Walk-in Truck
24	6/26/12	1FCJE39L1YGB64228	2000	1FC2E3KL0BDB17933	2011	Over 10K lbs	Walk-in Truck