

September 12, 2013

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Washington, DC 20590

This report serves as Oreion Motors LLC notification to the U.S Department of Transportation, National Highway Traffic Safety Administration that non-compliances with the requirements of FMVSS 571.500 and with Part 567, Certification Label, exist in certain Reaper Low Speed Vehicles. Oreion decided that these non-compliances exist on August 23, 2013.

1. Name of Company:

Oreion Motors LLC
5115 Industrial Park Road NE
Rio Rancho, New Mexico
Vehicle Model: Reaper Low Speed Vehicles
Contact: Kent Knox
Phone: 505-916-1206
Fax: 505-916-1206

2. Identification of the Recall Population and its Size

The Recall population is listed below and is based the total production of Reaper model vehicles that have either been sold or are at dealerships.

2013 Reaper Low Speed Vehicles - 278

2012 Reaper Low Speed Vehicles - 230

2011 Reaper Low Speed Vehicles - 18

Grand Total of vehicles - 526

100% of the population is estimated to be noncompliant.

Oreion Motors produces a similar vehicle model, the Sand Reaper, which is not certified as a LSV and is therefore not included in the above production numbers.

3. Description of the noncompliance and chronology of events.

During July of 2013 the Office of Vehicle Safety Compliance (OVSC) conducted FMVSS 571.500 compliance tests on a 2013 Oreion Reaper low speed vehicle. Noncompliance issues were brought to the attention of Oreion Motors in a letter dated August 5, 2013. These possible non-compliance issues included:

- a. The vehicle exceeded 25 mph during the test to determine maximum attainable speed. This is in violation of S5(a) of FMVSS500.
 - b. The vehicle was not equipped with red reflectors as far rearward as practicable on each side of the vehicle. This is in violation of S5(b)(5) of FMVSS500.
 - c. The GWR of the vehicle was incorrectly recorded on the certification label which is a violation with respect to Part 567, Certification.
4. Causes of the noncompliant conditions.
- a. The speed limiting device on the test vehicle was out of alignment and therefore ineffective during the compliance test. Oreion now believes that that design of the speed limiter was not robust enough to assure that the vehicle remained a LSV during the life of the vehicle and will replace the limiter with a more substantial design.
 - b. The lack of reflectors at the rear of each side of the vehicle was simply a design oversight and will be corrected.
 - c. Oreion miscalculated the GWR of this vehicle and is prepared to correct the certification labels.
5. The safety consequences of these noncompliant issues:
- a. Oreion realizes the importance of maintaining the speed of a LSV below 25 mph. For this reason the vehicle purchaser is required to sign numerous documents stating that they are aware that they are purchasing a low speed vehicle. The dealer must also sign documents that they explained that the vehicle being purchased is a low speed vehicle. Oreion is now redesigning the speed limiter such that anyone who attempts to remove the limiter will cause substantial damage to the vehicle. Oreion is also looking into future designs where the drive train will limit the speed of the vehicle.
 - b. The lack of rearward side reflectors could reduce the conspicuity of the vehicle at night time. Reflectors will be sent to vehicle owners for application. These reflectors will enhance the look of the vehicle therefore increasing the probability of the owners installing them.
 - c. Providing the correct GWR is important to assure that vehicle owners do not overload their vehicles. In this case the GWR was mistakenly under reported. A corrected certification label will be provided to vehicle owners.
6. Additional Information used in determination of the noncompliance

In addition to the information provided in the OVSC letter of August 5, 2013. Oreion Motors received a complete copy of the full compliance test report on August 22, 2013. Oreion continues to believe that when the test vehicle left the factory it performed as a LSV. The OVSC test has convinced Oreion that the speed limiter design was insufficient to assure compliance as a LSV and is therefore conducting a recall. The lack of the required side reflectors

and the incorrect recording of the GWR are regrettable design mistakes.

7. Remedy Program and Schedule

Oreion Motors has tested the remedy for bringing the Reeper into compliance with the speed requirement of FMVSS 571.500. (See attached speed graph documents from test report). We will permanently attach a shift plate and throttle limiter to the Reeper in a manner that any attempt to remove these items will result in significant damage to the vehicle. We will mail out Owner notification letters via first class mail once we receive approval from NHTSA regarding our Owner notification letters. (see attached draft) The letters will include reflective tape and instructions including a diagram on where to place the reflective tape on the rear of each side of the Reeper. A new Part 567 certification label with instructions and a diagram as to where and how to apply the label will also be included in the letter. Owners will be informed that the dealer will install both the reflectors and the new certification labels at no cost upon request.

Owner notification will be sent via first class mail once we receive approval from NHTSA regarding our Owner notification letter.

Dealer and Distributor notification has started and will be complete by September 19, 2013