

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On November 26, 2013 Turtle Top [MFR] decided that (a defect which relates to motor vehicle safety)(~~a noncompliance with Federal Motor Vehicle Safety Standard No. _____~~) exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 **Defect and Noncompliance Responsibility and Reports.**

Date this report was prepared: January 21, 2014, REVISED: February 11, 2014

Furnish the manufacturer's identification code for this recall (if applicable): Turtle Top: 14V-0??*
Trans/Air: 13E-049 & 13-002

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.

*NHTSA recall campaign number yet to be assigned

Independent Protection Company, Inc., dba Turtle Top

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

Janet L. Kercher-Dudley, Standards Engineer/DBELO

janetd@turtletop.com

Telephone Number: (574)831-4340 X146 Fax No.: (574)831-4349

Name and Title of Person who prepared this report.

Janet L. Kercher-Dudley

Standards Engineer/DBELO

Signed:



NOTE: This Part 573 Defect Report has been revised to include the total number of vehicles affected by the recall and the model names and model years involved in this campaign.

¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or by E-Mail to RMD.ODI@dot.gov.

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:

Make(s): Turtle Top **Model Years Involved:** 2006-2012 **Model(s):** various

Production Dates: Beginning: 06-01-2010 **Ending:** 06-15-2013

VIN Range: Beginning: Various **Ending:** Various

Vehicle Type: Bus **Bodystyle:** Transit Bus, MPV

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Recalled vehicles are equipped with a Trans/Air Manufacturing compressor mount kit. Vehicles affected are Ford cut-away type commercial buses and vehicles with 5.4L and 6.8L gas engines which were up-fitted by Turtle Top.

Make(s): _____ **Model Years Involved:** _____ **Model(s):** _____

Production Dates: Beginning: _____ **Ending:** _____

VIN Range: Beginning: _____ **Ending:** _____

Vehicle Type: _____ **Bodystyle:** _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): _____ **Model Years Involved:** _____ **Model(s):** _____

Production Dates: Beginning: _____ **Ending:** _____

VIN Range: Beginning: _____ **Ending:** _____

Vehicle Type: _____ **Bodystyle:** _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

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.

II. Identify the Recall Population

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

| Model | Year | Number of Vehicles Potentially Involved |
|---|-------------|--|
| See last page of this report for a listing of models and model years with quantities. | | |
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Total Number Potentially Affected by the Recall: 453

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100%

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

Turtle Top received a list from Trans/Air of affected vehicle VINs and registered vehicle owners. The list from Trans/Air is what Trans/Air has on record as to what vehicles Trans/Air compressor mount kits were installed into as well as a listing of vehicles which Trans/Air has record that the compressor mount kits were installed into, but which no vehicle owner record is available. Turtle Top, with the aid of data query, purchasing records, Turtle Top's vehicle build records where the optional equipment was ordered, along with manufacture dates, and dates affected recalled equipment was ordered and installed, Turtle Top will be able to determine potential vehicles affected under this recall by model names and model years. This list will be cross-referenced with Trans/Air's list to verify the correct affected population has been determined.

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.

From Tran/Air's Part 573 Report: Depending on the routing of the alternator harness, and the orientation of the heater hose spring clamp at the front of the intake manifold, the alternator harness may be pinched between the spring clamp and the compressor mounting bracket.

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

From Tran/Air's Part 573 Report: When installing the mount bracket, if the heater hose spring clamp tabs/tangs are not oriented to the rear of the engine, the alternator harness may be pinched between the spring clamp tabs/tangs and the compressor mounting bracket.

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

From Trans/Air's Part 573 Report: The clamp is electrically isolated from ground by the heater hose. As such, any piercing of the harness, and any of the 12V wires within by the clamp would normally not result in a short. However unlikely, the clamp could conceivably pierce a 12V wire and a ground wire, at the same time causing a short and an ignition point.

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

From Trans/Air's Part 573 Report: We (Trans/Air) believe any warning would be a burning smell or smoke in the engine compartment.

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

Trans/Air Manufacturing

480 East Locust Street

P.O. Box 70

Dallastown, PA 17313-0070 USA

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

Mark Slobodian, Vice President

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.

~~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.~~

6 above: October 2013 received notification letter, service bulletin, and registration list in hard copy from Trans/Air. Requested information in electronic form and received from Trans/Air in November 2013. Then in December 2013 received e-mail from Trans/Air that recall was not going to involved OEMs and thus recall did not require involvement from Turtle Top. Then Turtle Top received NHTSA's equipment query investigation (EQ) letter to Turtle Top dated January 14, 2014 in which Turtle Top was to respond to NHTSA's EQ concerning Turtle Top vehicles affected by Trans/Air's recall. Turtle Top contacted Trans/Air and Trans/Air apologized for miscommunication with Turtle Top that OEMs are to be involved with the compressor mount recall. Turtle Top wrote reply letter to the NHTSA in regards to the EQ letter (dated January 21, 2014), and it is included with this Part 573 report. NHTSA EQ14-001.

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 part. 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.

See Trans/Air's documents already posted to NHTSA equipment recall 13E-049 (document search—
website = <http://www-odi.nhtsa.dot.gov/recalls/>) for Part 573 Report and recall related documents.

See Trans/Air's Service Bulletin #13-002 for details on inspecting and identifying affected heater hose clamps and instructions on remedying the issue. Instructions include how to submit warranty claim to Trans/Air.

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.

From Trans/Air's Part 573 Report: 1). Inspect all vehicles for proper clamp orientation. 2). If the clamp is not oriented properly, move it to proper location. 3). If the harness was pinched, move it to proper location, and inspect harness. Repair if needed. 4). If the clamp is oriented properly, vehicle is acceptable.

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

The tab from the heater hose spring clamp will be oriented properly so that the alternator cable cannot be pinched against the compressor mount plate.

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.

From Trans/Air's Part 573 Report: The production remedy has been implemented, and includes an insulated p-clamp, bolt and nut to secure the harness into the mount bracket above the spring clamp area, preventing it from coming anywhere near the clamp. As a result, orientation of the clamp, and the clamp itself, will not be a factor.

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.

Jan. 21, 2014: e-mailed response letter to the NHTSA on EQ14-001 with preliminary Part 573 Defect Report.

Feb. 10, 2014: complete verification of Turtle Top vehicles involved in recall for determining models and model years.

Feb. 11, 2014: send Turtle Top's revised Part 573 Defect Report to the NHTSA with draft owner notification letter.

Feb. 12, 2014: send registration spreadsheet to Trans/Air to use for owner notification list mailing.

Approval of draft notification letter is necessary prior to mailing, once approved, letters can be sent to owners.

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.

Note: Included with the previous draft of this Part 573 Defect Report was a written response to NHTSA on the certified letter sent to Turtle Top dated January 14, 2014 about conducting an equipment query investigation (EQ14-001). Turtle Top will be working with Trans/Air who will be handling the recall on Turtle Top's behalf and Trans/Air will mail out owner notification letters and file quarterly reports with the NHTSA.

List of Turtle Top Vehicles involved with this Recall:

| Model Name | Model Year | Quantity |
|---------------------|-------------------|-----------------|
| Ford Limo Coach | 2010 | 1 |
| Ford Limo Coach | 2011 | 2 |
| Ford Limo Coach | 2012 | 4 |
| Ford Odyssey | 2010 | 23 |
| Ford Odyssey | 2011 | 39 |
| Ford Odyssey | 2012 | 106 |
| Ford Odyssey | 2013 | 27 |
| Ford Odyssey LT | 2010 | 5 |
| Ford Odyssey LT | 2011 | 3 |
| Ford Odyssey MPV | 2011 | 1 |
| Ford Odyssey XL | 2011 | 15 |
| Ford Odyssey XL | 2012 | 7 |
| Ford Odyssey XL | 2013 | 12 |
| Ford Odyssey XL MPV | 2011 | 1 |
| Ford Odyssey XL MPV | 2012 | 1 |
| Ford Van Terra | 2010 | 24 |
| Ford Van Terra | 2011 | 68 |
| Ford Van Terra | 2012 | 77 |
| Ford Van Terra | 2013 | 35 |
| Ford Van Terra MPV | 2010 | 1 |
| Ford Van Terra MPV | 2012 | 1 |
| | Total | 453 |