

Safety Defect and Noncompliance Report Guide for Vehicles  
**PART 573 Defect and Noncompliance Responsibility and Reports**<sup>1</sup>

On April 29, 2014 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: May 7, 2014

Furnish the manufacturer's identification code for this recall (if applicable): Ricon Corp: 14E-010

Note: this is a continuation of the following recalls: Turtle Top 13V-263 and Ricon 13E-001 and Ricon 12E-038\*

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.

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

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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

\*Ricon added to the population of recalled wheelchair lift armored pendant cables with an additional safety recall notice.

Signed:



<sup>1</sup> 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](mailto: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:** 2013 **Model(s):** Van Terra and Odyssey

**Production Dates: Beginning:** 04-11-2013 **Ending:** 12-05-2013

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

**Vehicle Type:** Bus **Bodystyle:** Transit Bus

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

Recalled vehicles are equipped with a Ricon S-series (S5510) public use platform (wheelchair) lift with armored pendant cable for operating the lift.

**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.**

<b>Model</b>	<b>Year</b>	<b>Number of Vehicles Potentially Involved</b>
Odyssey	2013	17
Van Terra	2013	1

**Total Number Potentially Affected by the Recall:** 18

**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 learned of the additional recalled wheelchair lifts through a notification letter from Ricon dated 04-24-14. Ricon included with the letter a hard copy listing of the serial numbers for the wheelchair lifts affected and purchased from Ricon by Turtle Top to install in Turtle Top buses. Based on information that Ricon provided Turtle Top, and 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 the vehicles affected under this recall by model names and model years. End user records were then queried to determine ownership of said vehicles.

**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 Ricon's Notification Letter:* The affected lifts are equipped with a hand held pendant control where upon the cord is protected by a flexible, steel conduit (an armored pendant cable) and an external power lug at the base of the hydraulic pump. In the event the lift is installed such that the armored pendant cable is not managed to be kept clear of the wheelchair lift and the power lug protective elastomeric cover is either omitted or improperly installed, the armored pendant cable may contact the power lug resulting in a high current short circuit and the possibility of fire.

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

*From Ricon's Part 573 Report:* Failure to install the pendant cable such that it is kept clear of the wheelchair lift base combined with an improperly installed or omitted protective elastomeric boot.

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

*From Ricon's Part 573 Report:* If the aforementioned short circuit occurs and is not removed within a few seconds, a vehicle fire may result in placing vehicle occupants at risk.

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

*From Ricon's Part 573 Report:* Sparks at the base of the lift power pack, rapid heating of the armored pendant cable, wisps of smoke, strong smell of burnt plastic.

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

Ricon Corporation  
A Wabtec Company  
7900 Nelson Road  
Panorama City, CA 91402

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

Stanton D. Saucier, P.E., Vice President—Marketing and Product Planning, Ricon Corporation

#### **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.~~**

Notification letter dated 04-24-2014 sent Certified Mail received by Turtle Top on 04-29-2014. Letter states: "Through several wheelchair lift variants were addressed in Ricon's Part 573 Reports of September 2012 (recall 12E-038) and January 2013 (recall 13E-001), some were missed such that a population of units was shipped with the incorrect pendant." . . . "A revised list of affected serial numbers, corresponding order numbers and ship dates of affected units sold to your company is attached". Turtle Top then did an internal data query and records search to determine vehicles which have the affects wheelchair lifts installed with the recall armored pendant cables.

#### **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 Ricon's documents already posted to NHTSA equipment recall 14E-010 (document search—  
website = <http://www-odi.nhtsa.dot.gov/recalls/>): for Ricon's Defect Notice (Part 573 Report) and other related documents.

*From Ricon's Part 573 Report:* Ricon will provide instructions for managing the pendant cord and will supply a supplemental elastomeric power lug cover kit at no charge.

**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 Ricon's Part 573 Report:* Ricon will provide instructions for managing the pendant cord and will supply a supplemental elastomeric power lug cover kit at no charge.

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

*From Ricon's Part 573 Report:* The lifts power cord will be treated with a new non-conducting cover.

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**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 Ricon's Part 573 Report:* Any units shipped with an armored pendant cord after January 4, 2014, are equipped with a non-conductive sheath over the armored pendant cord.

Note: Ricon's documents interchange the use of the terms "cable" and "cord".

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**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.**

May 7, 2014: Send 573 report to the NHTSA via e-mail.

May 8, 2014: Send draft notification letter to the NHTSA for review and approval.

Once draft notification letter is approved and the NHTSA assigns a vehicle recall campaign number, Turtle Top will be ready to mail notification letters to owners on record within 2 business days.

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## **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](mailto: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: Ricon who be submitting the required six quarterly recall completion reports on Turtle Top's behalf.