



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

September 27, 2018

Mr. Matthew Gaff
Standards Engineer
Turtle Top
67819 State Road 15
New Paris, IN 46553

NEF-150MR
18V-603

Subject: Wheelchair Lift may Raise too High

Dear Mr. Gaff:

This letter serves to acknowledge Turtle Top's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

TURTLE TOP/ODYSSEY/2013-2018
TURTLE TOP/TERRA TRANSIT/2013-2018
TURTLE TOP/VANTERRA/2013-2018

Mfr's Report Date: September 10, 2018

NHTSA Campaign Number: 18V-603

Components:

EQUIPMENT ADAPTIVE

Potential Number of Units Affected: 180

Problem Description:

Turtle Top is recalling certain 2013-2018 Turtle Top Odyssey, VanTerra, and Terra Transit transit buses, equipped with Ricon S-Series and K-Series Titanium Wheelchair Lifts. The wheelchair lift positioning input cam may fail while the lift is in use, allowing the platform to travel higher than the vehicle floor height.

Consequence:

If the wheelchair lift platform stops above the vehicle floor, the wheelchair user can tip inwards toward the vehicle when exiting the lift, increasing their risk of injury.

Remedy:

The remedy for this recall is still under development. The manufacturer has not yet provided a notification schedule. Owners may contact Turtle Top customer service at 1-800-296-2105.

Notes:

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

NHTSA is missing critical, required information for this safety recall. This information must be supplied through the NHTSA Recalls



Portal within 5 working days of confirming its accuracy:

- The percentage of products estimated to contain the defect or noncompliance (49 CFR 573.6 (c)(4)).
- In the case of a defect, a chronology of all principal events that were the basis for the determination that the defect related to motor vehicle safety, including a summary of all warranty claims, field or service reports, and other information, with their dates of receipt (49 CFR 573.6 (c)(6)).
- A description of the manufacturer's program for remedying the defect or noncompliance (49 CFR 573.6 (c)(8)(i)).
- Your company's 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 your company's notification of owners, purchasers and dealers, in accordance with § 573.13 of this part. Your company'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 your company's report to NHTSA under this section. If your company submits one or more general reimbursement plans, your company shall update each plan every two years, in accordance with § 573.13. Your company's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters (49 CFR 573.6 (c)(8)(i)).
- Your company must supply the estimates date(s) for which it will notify owners regarding this safety recall. If your company subsequently becomes aware that either the beginning or the completion dates reported to the agency for any of the notifications will be delayed by more than two weeks, your company shall promptly advise the agency of the delay and the reasons therefore, and furnish a revised estimate (49 CFR 573.6 (c)(8)(ii)).
- Your company must supply the estimates date(s) for which it will notify dealers and/or distributors regarding this safety recall. If your company subsequently becomes aware that either the beginning or the completion dates reported to the agency for any of the notifications will be delayed by more than two weeks, your company shall promptly advise the agency of the delay and the reasons therefore, and furnish a revised estimate. (49 CFR 573.6 (c)(8)(ii)).

Please be reminded of the following requirements:

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

Please be reminded that under 49 U.S.C. § 30112(a)(3), it is illegal for a manufacturer, to sell, offer for sale, import, or introduce or deliver into interstate commerce, a motor vehicle or item of motor vehicle equipment that contains a safety defect once the manufacturer has notified NHTSA about that safety defect. This prohibition does not apply once the motor vehicle or motor vehicle equipment has been remedied according to the manufacturer's instructions.

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Michelle Rice who may be reached by phone at (202) 366-1060, or by email at michelle.rice@dot.gov or through the office email at rmd.odi@dot.gov. We look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is written in a cursive style with a horizontal line extending to the right.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigations
Enforcement