



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

1200 New Jersey Avenue SE
Washington, DC 20590

May 28, 2024

Mr. Matthew Gaff
Compliance Manager
Turtle Top
67819 State Road 15
New Paris, IN 46553

NEF-107HG
24V-356

Subject: Seat Back Malfunction/FMVSS 210

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/2024
TURTLE TOP/ODYSSEY XL/2024
TURTLE TOP/TERRA TRANSIT/2024
TURTLE TOP/VAN TERRA/2024

Mfr's Report Date: May 21, 2024

NHTSA Campaign Number: 24V-356

Components:

SEATS

Potential Number of Units Affected: 7

Problem Description:

Turtle Top is recalling certain 2024 Van Terra, Terra Transit, Odyssey, and Odyssey XL vehicles, equipped with certain GO-ES Space Saver Foldaway Seats. The recliner mechanism may not engage when the seat back is fully reclined. As such, these vehicles fail to comply with the requirements of Federal Motor Vehicle Safety Standard number 210, "Seat Belt Assembly Anchorages."

Consequence:

The seat back could release when force is applied to the shoulder belt, increasing the risk of injury during a crash.

Remedy:

The remedy 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.nhtsa.gov.



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).

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

As stated in 49 U.S.C. § 30118(f), submission of eight consecutive quarterly reports followed by three annual reports is required. As described in 573.7, submission of the first of eight 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. The first of three consecutive annual status reports will be due on, or before, 1 year after the eighth quarterly report was submitted.

Please ensure the following requirements are met:

As required in Part 573.6(c)(7), in the case of a noncompliance, please provide the test results and other information used to determine the existence of the noncompliance. Include the date of each test and observation that indicated that a noncompliance might or did exist.

AMENDED 573 REQUIRED.

Per the requirements of 49 USC 30119, please provide the part number, name and description of the component or components involved in this recall. This information should be provided in an amended 573 in the "Involved Components" section.

AMENDED 573 REQUIRED.

A description of the manufacturer's program for remedying the defect or noncompliance (49 CFR 573.6 (c)(8)(i)).

AMENDED 573 REQUIRED.

Your company must supply the estimated date(s) for which it will notify owners regarding this safety recall. Please be reminded that all owners must be notified of the safety risk associated with this filing within 60 days of the 573 being submitted. If the remedy is not available at that time, mail the interim notice, following it with a second notice once the remedy becomes available. 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 therefor, and furnish a revised estimate. If there are no owners involved in this recall, please state so in the 573 (49 CFR 573.6 (c)(8)(ii)).

AMENDED 573 REQUIRED.

Your company must supply the estimated 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 therefor, and furnish a revised estimate. If your company does not have dealers or distributors, please state so in the 573 (49 CFR 573.6 (c)(8)(ii)).

AMENDED 573 REQUIRED.

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. 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. If your company submits one or more general reimbursement plans, your company shall update each plan every two years (§ 573.13). If the vehicles are new and would be covered under the manufacturer's warranty program, please state that in the remedy section of your filing.

AMENDED 573 REQUIRED.

An identification and description of the risk to motor vehicle safety reasonably related to the defect or noncompliance (49 CFR 573.6 (c)(5)). All filings should state an increased risk of either a crash, injury or fire.

AMENDED 573 REQUIRED.

Turtle Top's contact for this recall will be Hensly Guerra who may be reached by email at hensly.guerra1@dot.gov. We look forward to working with you.

Sincerely,



Alex Ansley
Chief, Recall Management Division
Office of Defects Investigation
Enforcement