



12/20/2024

## NONCONFORMANCE INFORMATION REPORT

1. Vehicle Manufacturer Name:

U.S Vehicle Manufacturing and Sales

Orange EV “OEV”  
900 N. 69<sup>th</sup> Street, Kansas City, KS 66102

Affiliated Canadian Sales Company

Orange EV Canada  
3278 South Service Rd West, Unit 4  
Oakville, ON L6L 0B1, Canada

2. Identification of Involved Vehicles and Affected Components:

Based on production records, we have determined the involved vehicle population to be the vehicles listed in the table below:

Make/Model	Model Year	Production Period
T- Series Pure Electric Terminal Truck	2021 - 2023	2021 - 2023
e-TRIEVER	2023 – 2024	2023 – 2024
HUSK-e	2023 – 2024	2023 – 2024

3. Total Number of Vehicles Potentially Involved:

T-Series Pure Electric Terminal Truck : 51  
e-TRIEVER : 28  
HUSK-e : 7  
Total : 86

4. Percentage of Vehicles Estimated to Actually Contain the Defect:

100% of all subject vehicles.



5. Description of Problem:

Certain 2021-2023 T- Series Pure Electric Terminal Trucks, 2023-2024 e-TRIEVERs, and 2023-2024 HUSK-es built with frame extenders do not meet the FMVSS 108 visibility requirements of installed Backup lamps, Taillamps, Stop Lamps, and Rear Turn Signals. Tables V-a, and V-b, of FMVSS 108 state the following for visibility requirements for Backup lamps, Taillamps, Stop Lamps, and Rear Turn Signals,

*Backup lamps - Table V-a, "Lamps must be mounted so that the optical center of at least one lamp is visible from any eye point elevation from at least 1828 mm (6 ft) to 610 mm (2 ft) above the horizontal plane on which the vehicle is standing; and from any position in the area, rearward of a vertical plane perpendicular to the longitudinal axis of the vehicle, 914 mm (3 ft), to the rear of the vehicle and extending 914 mm (3 ft) beyond each side of the vehicle."*

*Taillamps, Stop Lamps, and Rear Turn Signals- Table V-b "Unobstructed minimum effective projected luminous lens area of 1,250 sq mm in any direction throughout the pattern defined by the specified corner points."*

The frame extenders on affected vehicles create a 100% outboard obstruction of the Backup lamps, Taillamps, Stop Lamps, and Rear Turn Signals. Because of this obstruction, affected trucks do not comply with FMVSS 108.

6. Chronology of Events:

July 9, 2024

During the design review of a potential future truck, Orange EV (OEV) Regulatory Compliance was requested to confirm that the FMVSS 108 lighting requirements for on road use were going to be met.

July 10 - August 15, 2024

Regulatory Compliance conducted a formal review of FMVSS 108 to verify all items that are applicable to our Class 8 truck tractors.

October 9 – November 7, 2024

*October 9, 2024* - The OEV Engineering Test team began conducting the required testing per FMVSS 108 to certify compliance with standards.

*October 18, 2024* - During the visibility testing of tail lamps and backup lamps of the affected trucks with frame extenders, it was identified that the frame extenders create a 100% outboard obstruction.

*October 19 – November 7, 2024* – OEV Engineering Test team finished testing for all other lighting requirements, finalized their report, and provided a comprehensive test report analysis to Regulatory Compliance.

November 8 – December 12, 2024



OEV Legal and Regulatory Compliance conducted a review and verification of test findings against any potential historically documented guidance/exceptions/exemptions.

December 12, 2024

OEV determined that affected trucks manufactured with frame extenders do not conform to FMVSS 108.

December 12, 2024

Orange EV halted delivery of new trucks with frame extenders until a remedy could be determined.

At this time, Orange EV is not aware of any crashes, injuries or fatalities related to this condition.

7. Description of Corrective Repair Action:

All known owners of the subject vehicles will receive an interim notification. They will be instructed to limit on-road use when operating without a trailer. Owners will be contacted again when the remedy is available. Orange EV notify the agency when the remedy is available as required by 49 CFR Part 573.

8. Recall Schedule

Notifications to owners of the affected vehicles will occur by February 17, 2025. A copy of the draft owner notification will be submitted as soon as it is available.

9. Distributor Notification Schedule:

There will be no Dealer/Distributor Notifications as Orange EV is the sole Dealer/Distributor of Orange EV trucks.

10. Manufacturer's Campaign Number:

[Interim / Remedy]: 2024-SRC-04I / 2024-SRC-04