



12/20/2024

NONCONFORMANCE INFORMATION REPORT

1. Vehicle Manufacturer Name:

U.S Vehicle Manufacturing and Sales

Orange EV “OEV”
900 N. 69th 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	2017 - 2024	2017 - 2024
e-TRIEVER	2023 – 2025	2023 – 12/12/2024
HUSK-e	2023 – 2024	2023 – 12/12/2024

3. Total Number of Vehicles Potentially Involved:

T-Series Pure Electric Terminal Truck : 837
e-TRIEVER : 407
HUSK-e : 32
Total : 1276

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

100% of all subject vehicles.



5. Description of Problem:

Certain 2017-2024 T- Series Pure Electric Terminal Trucks, 2023-2025 e-TRIEVERs, and 2023-2024 HUSK-es do not meet FMVSS 108 requirements for quantity and mounting location of Front Side Marker lamps and Front Reflex Reflectors. Table I-a of FMVSS 108 states the following for quantity and mounting requirements for Front Side Marker Lamps and Front Reflex Reflectors

Side Marker Lamps – “2 Amber, On each side as far to the front as practicable”

Reflex Reflectors – “2 Amber, On each side as far the front as practicable”

All T- Series Pure Electric Terminal Trucks, e-TRIEVERs, and HUSK-es with a manufacturing date prior to December 12, 2024, were produced without front side marker lights, and with a passenger side front reflex reflector in the incorrect location. Because 2 side marker lights and 2 reflex reflectors are required on each side as far to the front as practicable, 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 9, 2024 - During the verification of quantity, mounting location, and mounting height of front side marker lamps and front reflex reflectors of the affected trucks, it was identified that there were no front side marker lamps and that the passenger side front reflex reflector was mounted on the side of the cab of the truck, not the side of the truck.

October 10 – 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 without front side marker lights, and with a passenger side front reflex reflector in the incorrect location do not conform to FMVSS 108.

December 12, 2024

Orange EV halted delivery of new trucks without front side marker lights, and with a passenger side front reflex reflector in the incorrect location 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-05I / 2024-SRC-05