



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

1200 New Jersey Avenue SE
Washington, DC 20590

September 18, 2018

Mr. Richard Wagner
Brown Industries, LLC
807 East 29th st
Lawrence, KS 66046

NEF-150MR
18V-577

Subject: Wheelchair Lift may Raise too High/FMVSS 403

Dear Mr. Wagner:

This letter serves to acknowledge Brown Industries, LLC'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:

AMERICAN HERITAGE/TROLLEY/2017-2018

Mfr's Report Date: August 30, 2018

NHTSA Campaign Number: 18V-577

Components:

EQUIPMENT ADAPTIVE

Potential Number of Units Affected: 4

Problem Description:

Brown Industries, LLC (Brown) is recalling certain 2017-2018 American Heritage Trolley buses, equipped with certain Ricon S-Series and K-Series Titanium Wheelchair Lifts, models K200, K201, K550, K551, S200, S2201, S550 and S551. The wheelchair lift positioning input cam may fail while the lift is in use, allowing the platform to travel higher than the vehicle's floor height. As such, these vehicles fail to comply with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) number 403, "Platform Lift Systems."

Consequence:

If the wheelchair 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:

American Trolley will notify owners and Ricon dealers will replace the defective input cams, free of charge. The recall is expected to begin in September 2018. Owners may contact American Trolley customer service at 1-800-255-6827.

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.

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.

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,



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