



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

1200 New Jersey Avenue SE
Washington, DC 20590

October 9, 2019

Mr. Ken Schwertner
SynTec Seating Solutions, LLC
200 Swathmore Ave.
High Point, NC 27263

NEF-150KL
19E-065

Subject: Insufficient Impact Absorption/FMVSS 222

Dear Mr. Schwertner:

This letter serves to acknowledge SynTec Seating Solutions, 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:

SYNTEC/S3B BASE/9999
SYNTEC/S3C SCHOOL BUS SEATS/9999

Mfr's Report Date: October 3, 2019

NHTSA Campaign Number: 19E-065

Components:

SEATS

Potential Number of Units Affected: 1,156,972

Problem Description:

SynTec Seating Solutions, LLC (SynTec) is recalling certain S3B Base and S3C Base Convertible school bus seats. The seats may have been manufactured with styrene blocks that do not provide sufficient impact absorption in areas around the steel seat frame of the back support. As such, these vehicles fail to comply with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) number 222, "School Bus Passenger Seating and Crash Protection."

Consequence:

The lack of impact absorption increases the risk of injury in the event of a crash.

Remedy:

SynTec will notify the affected bus manufacturer, and dealers for that manufacturer will install an additional impact material between the re-bond back and the vinyl back cover, free of charge. The manufacturer has not yet provided a notification schedule. Owners may contact SynTec customer service at 1-336-862-7509.

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)).

- 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)). 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.

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.

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).

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 Kristin Lepper who may be reached by phone at 202-366-5227, or by email at kristin.lepper@dot.gov. We look forward to working with you.

Sincerely,



Joshua Neff
Chief, Recall Management Division
Office of Defects Investigations
Enforcement