



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

1200 New Jersey Avenue SE
Washington, DC 20590

May 8, 2019

Mr. Cabot Smith
Cabot Coach Builders inc DBA Royale
99 Newark Street
Haverhill, MA 01832-134

NEF-150MR
19V-249

Subject: Seat Back may not Stay Upright

Dear Mr. Smith:

This letter serves to acknowledge Cabot Coach Builders inc DBA Royale'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:

MERCEDES BENZ/SPRINTER/2015-2017

Mfr's Report Date: March 28, 2019

NHTSA Campaign Number: 19V-249

Components:

SEATS

Potential Number of Units Affected: 4

Problem Description:

Cabot Coach Builders, Inc DBA Royale (Royale Limousine) is recalling certain 2015-2017 Mercedes Sprinter-based mini coaches equipped with Freedman GO-ES Foldaway Seats, part numbers 437052OLHIFOLD and 43705PFOLDSS. When the back seat cushion is rotated from the stowed position to the upright position, the seat cushion may not remain locked into place when under load, such as in a crash or a sudden stop.

Consequence:

In the event of a crash, if the seat back moves, the seat occupant has an increased risk of injury.

Remedy:

The remedy for this recall is still under development. The manufacturer has not yet provided a notification schedule. Owners may contact Royale Limousine customer service at 1-800-544-5587.

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:

- A description of the manufacturer's program for remedying the defect or noncompliance (49 CFR 573.6 (c)(8)(i)).
- Your company must supply the estimated date(s) for which it will notify owners 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 therefore, and furnish a revised estimate (49 CFR 573.6 (c)(8)(ii)).
- 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 therefore, and furnish a revised estimate. (49 CFR 573.6 (c)(8)(ii)).

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.

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 Michelle Rice who may be reached by phone at (202) 366-1060, or by email at michelle.rice@dot.gov. We look forward to working with you.

Sincerely,



Kareem Habib
Acting Chief, Recall Management Division
Office of Defects Investigations
Enforcement