November 22, 2023
Manufacturer: Ricon
Product: Threshold Warning System Kit PN RI32885

Chronology of Defect / Noncompliance Determination

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:

In late August 2023, Ricon was notified by one of its OEM customers that an analysis of the Threshold Warning Kit used in one of its platform lift models suggested that the beacon used in the kit did not meet the 20 candela minimum requirement provided in FMVSS 403, S6.1.4. After receiving this information, Ricon contacted the supplier of the lighting beacon to investigate the concern. Ricon also contacted the third-party conducting the analysis of the Threshold Warning Kit on behalf of the OEM to understand its testing process and methodologies. The beacon supplier informed Ricon that the beacon is rated to "2 mean spherical candle power". Following receipt of this information, in September – early October 2023, Ricon investigated further to understand whether any revisions or changes to the specifications of the beacon had occurred since in December 2022, the same third-party facility used by the OEM had provided Ricon with a compliance analysis indicating that the same beacon used in the same Threshold Warning Kit exceeded the candela requirements.

In light of these conflicting results, between mid to late October, Ricon conducted additional analysis of the candela values of the beacon. Samples of the beacon were taken from Ricon's facilities and were also provided to the lighting supplier and to the third-party facility for their separate assessments of the candela values. The lighting supplier's report was provided in late October 2023, but did not provide a light intensity measurement in candelas as needed. In early November 2023, Ricon again requested information from the third-party conducting the original compliance assessment on its testing procedures and methodologies as well as to explain why the beacon evaluated in the December 2022 test report indicated it met the light intensity requirements. In this time frame, Ricon's investigation also found that the lamps it had sourced for use in the beacon had been certified to meet FMVSS 108 and designed for use in heavy vehicle applications which further suggested to Ricon there was likely an issue with the process by which the beacon was evaluated instead of with the beacon itself.

Additional analysis of the beacon by the supplier, Ricon and the third-party continued into mid-November with each indicating inconsistent light intensity results. Despite these inconsistent results, on November 17, 2023, Ricon determined that the beacon contained in the threshold warning signal system does not meet the light intensity requirements of FMVSS 403, S6.1.4. Ricon is not aware of any reports of injury potentially related to this issue.