REPORT NUMBER: 120-MGA-2011-004

SAFETY COMPLIANCE TESTING FOR FMVSS NO. 120 TIRE SELECTION AND RIMS FOR MOTOR VEHICLES WITH A GVWR OF MORE THAN 4,536 kg

STARTRANS 2010 MFSAB NHTSA NO.: CA0900

PREPARED BY:
MGA RESEARCH CORPORATION
5000 WARREN ROAD
BURLINGTON, WI 53105



FINAL REPORT DATE: NOVEMBER 23, 2011

FINAL REPORT

PREPARED FOR:
U.S. DEPARTMENT OF TRANSPORTATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
ENFORCEMENT
OFFICE OF VEHICLE SAFETY COMPLIANCE
MAIL CODE: NVS-220
1200 NEW JERSEY AVENUE, S.E.
WASHINGTON, D.C. 20590

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Prepared by

Eric Peschman. Proiect Engineer

Date: November 23, 2011

Reviewed by:

Michael Janovicz, Program Manager

Date: November 23, 2011

FINAL REPORT ACCEPTED BY:

Date of Acceptance

Technical Report Documentation Page

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15. Supplementary Notes		1

16. Abstract

A compliance test was conducted on the subject 2010 Startrans MFSAB, NHTSA No.: CA0900, in accordance with FMVSS 120, "Tire selection and rims for motor vehicles with a GVWR of more than 4,536 kilograms," and TP-120-03. The vehicle was weighed in the unloaded and fully loaded conditions and its tires, rims, and related information were checked.

Test failures: The block capital letters and numbers on the combined certification and tire information label are smaller than 2.4 mm in height (see Laboratory Notice of Test Failure).

17. Key Words		18. Distribution Statement	
Compliance Testing		Copies of this report are available from:	
Compliance Testing Safety Engineering		NHTSA Technical Information Services (NPO-411)	
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		Washington, DC 20590	
		Email: tis@nhtsa.dot.gov	
FAX: 202-493-2833			
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SECTION 1 PURPOSE OF COMPLIANCE TEST

The purpose of this test report is to document the results of tests performed on a MY 2010 Startrans MFSAB, NHTSA No.: CA0900, in accordance with the requirements stated in Federal Motor Vehicle Safety Standard (FMVSS) No. 120, "Tire selection and rims for motor vehicles with a GVWR of more than 4,536 kilograms."

This standard establishes requirements to ensure that applicable vehicles are equipped with tires of adequate size and load rating and rims of appropriate size and type designation.

TEST PROCEDURE AND DISCUSSION OF RESULTS

Testing of the 2010 Startrans MFSAB, NHTSA No.: CA0900, was conducted at MGA Research Corporation in accordance with NHTSA TP-120-03, dated April 10, 2000 and with MGA-TP-120-03 dated November 20, 2002. The vehicle mounted tires and rims were surveyed to ensure that the rims were suitable for the tires and that the tires inflated to the maximum inflation pressure stated on the tire sidewall were appropriate for the vehicle's certified Gross Axle Weight Ratings (GAWR). The vehicle certification and tire information labeling was surveyed to ensure that the vehicle manufacturer's recommended rims were suitable for the recommended tires, and that the recommended tires inflated to the recommended inflation pressures stated on the labeling were appropriate for the vehicle's certified GAWRs. The vehicle was ballasted and weighed in three different loading conditions to determine if axle or tire overloading could occur. The three loading conditions were:

- Condition 1 Unloaded Vehicle Weight (UVW).
- Condition 2 Vehicle in Condition 1 state plus the addition of ballast to simulate twenty-one passengers (one adult driver and twenty students).
- Condition 3 Vehicle in Condition 2 state plus the addition of ballast to simulate cargo loading.

 Target vehicle load is the vehicle loaded to the certified gross vehicle weight rating (GVWR).

The vehicle mounted tires inflated to the inflation pressure labeled on the tire sidewall and the vehicle labeled tires inflated to the recommended cold inflation pressures have load ratings appropriate to carry the maximum loads as required by FMVSS No. 120. The vehicle rims are suitable for the vehicle tires and contain the required markings. The block capital letters and numbers on the combined certification and tire information label are smaller than the required minimum height of 2.4 mm as specified in FMVSS No. 120 Paragraph S5.3.

SECTION 2 TEST PROCEDURE AND DISCUSSION OF RESULTS

Model Year / Mfr. / Make / Model	2010 Startrans MFSAB	
Incomplete Vehicle Make / Model	General Motors	
NHTSA No.	CA0900	
GVWR	6,441 kg	
Build Date for Bus	10/2010	
VIN	1GB9G5AG4A1118869	
Designated Seating Capacity	(1 Driver, 20 Passengers)	
Vehicle Type	MFSAB	
Tire Pressure from certification label (at capacity)	Front: 450 kPa	Rear: 550 kPa
Odometer Reading	1,542 miles	
Dealer Installed Optional Accessories	None Noted	

SUMMARY

Requirements	PASS / FAIL
TIRE AND RIM SELECTION (S5.1)	PASS
Installed tires and rims are suitable for vehicle	1 AOO
Rim Marking (S5.2)	PASS
Rims contain all required markings of proper dimensions	1 700
LABEL INFORMATION (S5.3)	
Vehicle has proper certification/tire information label. Label tires at	FAIL
recommended inflation pressure and rims are suitable for vehicle.	
Weight Distribution (49 CFR 567 Certification)	PASS
Vehicle loaded with occupants and cargo does not exceed GVWR	PASS
Results	FAII
Test data indicates compliance with FMVSS 120	FAIL

SECTION 3 COMPLIANCE TEST DATA

DATA SHEET 1 GENERAL TIRE AND RIM DATA

Test Vehicle: 2010 Startrans MFSAB NHTSA No.: CA0900

Test Lab: MGA Research Corporation Test Date: 9/2/11 - 9/6/11

GENERAL DATA

Tire Type: (Passenger car or other)	Light Truck
Are the tire and rim sizes the same for all axles, including the spare?	Yes
Does the tire size fitted to the axles appear on the Certification or Tire label? (If NO, describe)	Yes
Number of axles	2
Dual tires on rear axle(s)	Yes

TIRE DATA FROM SIDEWALL

	Right Front
Manufacturer	Uniroyal
Brand	Laredo HD
Tire Size	LT225/75R16
Maximum Tire Load Rating (kg)	Single: 1,215 kg Dual: 1,120 kg
De-rated Tire Load Rating (kg)	N/A
Maximum Inflation Pressure (KPa)	550
Tire has DOT symbol (Yes/No)	Yes
DOT serial number	M31L

MOUNTED TIRE VS. AXLE RATING COMPARISON

(AT SIDEWALL MAXIMUM INFLATION PRESSURE)

	Front Axle	Rear Axle
A. GAWR (kg) from certification label	2,087	4,354
B. (No. of tires) x (tire load rating (kg) from above table)	2,430	4,480
C. Is "B" equal to or greater than "A"? (Yes/No)	Yes	Yes

DATA SHEET 1 GENERAL TIRE AND RIM DATA

Test Vehicle: 2010 Startrans MFSAB NHTSA No.: CA0900

Test Lab: MGA Research Corporation Test Date: 9/2/11 - 9/6/11

RIM MARKINGS

Right Front
Т
16 X 6.5J
Yes
Accuride
10 20 09
Yes
Yes – 4.31 mm
Impressed
Yes
Yes
Yes

RIM MEASUREMENTS

	Right Front
Rim width	166 mm
Rim diameter	407 mm
Rim measurements same as rim markings? (Yes/No)	Yes

Requirements	PASS / FAIL
TIRE AND RIM SELECTION (S5.1) Installed tires and rims are suitable for vehicle	PASS
Rim Marking (S5.2) Rims contain all required markings of proper dimensions	PASS

Remarks: None

Tested By: Euro Tested

Approved By:

Date: September 2, 2011

DATA SHEET 2

CERTIFICATION AND TIRE LABEL INFORMATION

Test Vehicle: 2010 Startrans MFSAB NHTSA No.: CA0900

Test Lab: MGA Research Corporation Test Date: 9/2/11 - 9/6/11

LABEL INFORMATION

Label Design (Combined Certification and Tire Label)	Combined
Label Design (Separate Tire Information Label)	N/A
Label in English? (Yes/No)	Yes
Block capital letter and numbers are not less than 2.4 mm in height (Yes/No)	No – 2.1 mm
Label is permanently affixed; describe method of affixing (rivets, glue, etc.)	Yes / Screws
Does label text color contrast with background? (Yes/No)	Yes
Location of Label(s) on the vehicle	Above Driver's Seat on Bulkhead

TIRE AND RIM DATA FROM LABEL (FOR EACH GAWR/GVWR)

GVWR: 6,441 kg	Front Axle	Rear Axle
Tire Size	LT225/75R16	LT225/75R16
Rim Size (in)	16 X 6.5J	16 X 6.5J
Recommended inflation pressure (KPa)	450	550
Are labeled rims suitable for labeled tires (Yes/No) ¹	Yes	Yes
Referenced load rating at label recommended inflation pressure (kg) ¹	1,060	1,120

¹ Referenced source for tire/rim match and load rating data: <u>2011 Tire and Rim Association Yearbook</u>

CERTIFICATION/TIRE LABEL MAXIMUM CAPACITY COMPARISON

GVWR: 6,441 kg	Front axle	Rear Axle
A.GAWR (kg) FROM CERTIFICATION LABEL	(C) 2,087	(D) 4,354
B.(No. of tires) x (Tire load rating (kg))	2,120	4,480
Is "B" equal or greater than "A"? (Yes/No)	Yes	Yes
Is (C) plus (D) equal to or greater than GVWR? (Yes/No)	Ye	S

DATA SHEET 2 CERTIFICATION AND TIRE LABEL INFORMATION

Test Vehicle: 2010 Startrans MFSAB NHTSA No.: CA0900

Test Lab: MGA Research Corporation Test Date: 9/2/11 - 9/6/11

Requirements	PASS / FAIL
Vehicle has proper certification/tire information label. Label tires at recommended inflation pressure and rims are suitable for vehicle.	FAIL

Remarks: Letter height on the label is smaller than the minimum 2.4 mm requirement.

Tested By:

Approved By:

Date: September 2, 2011

DATA SHEET 3 WEIGHT DISTRIBUTION

Test Vehicle: 2010 Startrans MFSAB NHTSA No.: CA0900
Test Lab: MGA Research Corporation Test Date: 9/2/11 - 9/6/11

FLUID LEVELS								
Fuel:	FULL							
Coolant:	FULL							
Other Fluids: Washer fluid, brake fluid, etc.	FULL							

TIRE PRESSURES									
Tire	Left Front	Right Front	Left Rear	Right Rear					
Tire Pressure (KPa)	450	450	550	550					

OCCUPANT AND CARGO LOADS								
Total Occupant Load (KG): [# of designated seating position or 54 KG per student]	1,148 (1-driver, 20-students)							
Manufacturer's Rated Cargo Loc [If not stated on vehicle or provid leave blank]								
Certified GVWR - Meas 6,441 KG - 4,366 KG - 1,148 k	pant Load = Rated Cargo Load positive)							
Describe Placement of Cargo:	Next to Driver's Seat and In Aisle							

WEIGHT DISTRIBUTION

HEIGHT DIGHT.											
	Tire or	CONDI	TION 1	CONDI	TION 2	CONDITION 3					
ITEM	Vehicle	U∖	/W	Cond. 1 +	occupants	Cond. 2 + cargo					
I I EIVI	Rating*	(k	g)	(kṛ	g) .	(kg)					
	(kg)	Measured	Overload	Measured	Overload	Measured	Overload				
Left Front Tire	1,060	771 No		802	No	1,026	No				
Right Front Tire	1,060	764	764 No		No	1,060	No				
Front Axle	2,087	1,535	No	1,594	No	2,086	No				
Left Rear Tire	2,240	1,397	No	1,946	No	2,134	No				
Right Rear Tire	2,240	1,436	No	1,976	No	2,222	No				
Rear Axle	4,354	2,833	No	3,922	No	4,354	No				
Total Vehicle	6,441	4,366	No	5,516	No	6,440	No				

^{*} Vehicle and axle weight ratings (GVWR & GAWR) are located on the vehicle certification label plate. Vehicle tire load ratings are based upon the inflation pressure specified on the certification label plate for each respective axle, as determined from the appropriate tire manufacturer's specification table.

DATA SHEET 3 WEIGHT DISTRIBUTION

Test Vehicle: 2010 Startrans MFSAB NHTSA No.: CA0900

Test Lab: MGA Research Corporation Test Date: 9/2/11 - 9/6/11

Requirements	PASS / FAIL
Weight Distribution (49 CFR 567 Certification) Vehicle loaded with occupants and cargo does not exceed GVWR	PASS

Remarks: None

Tested By:

Approved By: Hickar Canon

Date: September 6, 2011

SECTION 4 INSTRUMENTATION AND EQUIPMENT LIST

Test Vehicle: 2010 Startrans MFSAB NHTSA No.: CA0900

Test Lab: MGA Research Corporation Test Date: 9/2/11 - 9/6/11

	Digital Caliper	Vehicle Scale	Vehicle Scale	Tape Measure
Make	Mitutoyo	GSE	GSE	Stanley
Model	CD 6" CS	465	465	Powerlock 3M
Serial No.	07416506	004804&212091R	004804&212092R	573
Range	0 to 150 mm	0 to 20,000 lb	0 to 20,000 lb	0 to 8 m
Accuracy	0.01 mm	0.25% static	0.25% static	1 mm
Cal. Date	12/28/10	10/01/10	10/01/10	06/06/11
Cal. Interval	1 Year	1 Year	1 Year	6 Months

INSTRUMENTATION AND EQUIPMENT LIST

Test Vehicle: 2010 Startrans MFSAB NHTSA No.: CA0900

Test Lab: MGA Research Corporation Test Date: 9/2/11 - 9/6/11

SCALE CALIBRATION SHEET

TYPE	DIGITAL	FLOOR	SERIAL#		00	04804	ID#		NONE CL/	ASS	IIIL
MANUFACTURER	G	SE	CAPACITY		2	0,000	MAX. LOAD	1	5,000 UN	ITS	LBS
MODEL	4	65	MIN. DIV.			5	LOCATION		BUS AND TRUCK	BAY 1	
TEST AND UNCERT	AINTY PROCE	DURE JUSTIF	ICATION		1	NIST TRACEA	BLE TEST ST	ANDARD	S USED THIS CALIE	BRATION	
LEASE REFER TO TEST STANDARD	TRACEABILITY DOC	UMENTS MADE PART	OF	50	# NUI	MBER(S)	Color	C600	0-619		
SCALE MAINTENANCE AND CALIBRA	ATION PROCEDURE M	ANUAL; SERIAL#	MGA-804-L1	50	0# NL	JMBER(S)	BOI -	· ·			
THERE WAS NO DEVI	ATION IN PROCE	DURE AS WRI	TTEN	10	00# N	IUMBER(S)	NS1-1	1,00	- NSI-A	1115	
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LEASE REFER TO TEST STANDARD		After Control of the Control	V107	-	mper		- 110111101			ent M	
SCALE MAINTENANCE AND CALIBRA			MGA-804-L1	Vil	bratio	n nove			V 0 ~	0D	
VISUAL INSPEC	CTION	ACCEPT	REJECT						F SUB-CONTRACT		411
FUNCTIONALITY; as left	1 1177 4 1- 6			-	_				c. facility, Menomone	e Falls, V	VI.
REPEATABILITY/SENSITI		/	-	LE	i nis te				facility; located at: RLINGTON, WI 5310	5	
PHYSICAL CONDITION; a SUITABILITY FOR INTENI		1			Cubaa	ontracted to:	INNEN KOAD	/ 601	KEING LOIN, WI 03 10	•	
SOTABILITY FOR INTEN	JED UGE	ν	*** []			RESULTS ***			/		
		AS FO		IVAL	LOI	TEOGETO	AS LEFT		TOLER	ANCES	
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	VALUE	VALUE		S	CALI			4 4			
DISTRIBUTION	1000	1000	0	1	T	1000	0	/	995		1005
DISTRIBUTION	2000			1	-		0	7	1995		2005
		2000	0	1	-	2000		/	2990		3010
DISTRIBUTION	3000	3000	0	1		3000	0	/	3990		4010
DISTRIBUTION	4000	4000	0	1		4000		-	4990		
DISTRIBUTION	5000	5000	0	1	-	5000	0	_			5010
DISTRIBUTION	10,000	9995	157	1		10000	0	/	9980		10,020
DISTRIBUTION	15,000	14990	(10)	/		15000	0	/	14,970	_	15,030
DISTRIBUTION	18,000	17985	(15)	0		18000	0	/	17,960		18,040
				PAG	E (1)	OF (2)					
			***	FINAL	CONC	CLUSIONS ***					
AS FOUND: ACCE	PT REJE	ст 🗆	AS L	EFT:	ACCE	EPT 🗹 REJE	ст 🗆	AC	TION PENDING :		
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ESTIMATED UNCERTAIN	NTY OF THIS CAL	IBRATION IS _	:	BY CS	TYPE	EVALUATION	DEFAULT; WITH	A CONFIDE	NCE LEVEL OF 95%.		
W UNCERTAINTY OF THIS	CALIBRATION IS	S UNKNOWN BY	STATISTICAL O	CALCU	LATIO	N; ASSUMED E	QUAL TO ± 50%	OF THE MI	NIMUM VALID DIVISION	l,	
Technician's Commen	ts/Observation	s/Opinions:	Adj	ste	J	Calle	Carter				
			3						APP	ROV	ED
The serial number of		1	MGAO	CE IDE					THIS REPORT. ** N written consent of C	ertified S	cale Inc."
This report, page () of () Was	completed on	10 1 Jan	010	_ by	Br	W Certi	Sied Scale	nc. Representative		
Next scheduled Full C	Calibration is du	· 4/10	11		Ne	ext Preventive	Maintenance v		NA		

The calibration interval for this instrument is 12 months. The next scheduled full calibration is due September 30, 2011.

INSTRUMENTATION AND EQUIPMENT LIST

Test Vehicle: 2010 Startrans MFSAB NHTSA No.: CA0900

Test Lab: MGA Research Corporation Test Date: 9/2/11 - 9/6/11

SCALE CALIBRATION SHEET

TYPE		FLOOR	SERIAL#			4804	EARCH CO		NONE	CLASS	IIIL
MANUFACTURER	G	SE	CAPACITY		20	,000	MAX. LOAD		15,000	UNITS	LBS
MODEL	4	65	MIN. DIV.			5	LOCATION	OCATION		RUCK BAY	1
TEST AND UNCERT	AINTY PROCE	DURE JUSTIF	ICATION		N	IST TRACEA	BLE TEST ST	ANDAR	DS USED THIS	CALIBRAT	ION
LEASE REFER TO TEST STANDAR	D TRACEABILITY DOC	UMENTS MADE PART	OF	50#	NUN	MBER(S)	C680	- (0)	9		
CALE MAINTENANCE AND CALIBR	ATION PROCEDURE M	ANUAL; SERIAL #	MGA-804-L1	500	O# NU	IMBER(S)	BO1-	BOL	0		
THERE WAS NO DEVI	ATION IN PROCE	EDURE AS WRIT	TTEN	100	00# N	UMBER(S)	NSI-A	100	thru NSI	- A115	
DEVIATION FROM PR	OCEDURE IS NO	TED HEREUPO	N								
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EASE REFER TO TEST STANDAR		100000000000000000000000000000000000000		_	mpera		o Humid	-	9% Air N	Movement _	Minima
CALE MAINTENANCE AND CALIBR			MGA-804-L1	Vib	ration			Other		DACTOR	
VISUAL INSPE	CTION	ACCEPT	REJECT						OF SUB-CONT		H- IAII
FUNCTIONALITY; as left	11/0TV I-6	2.22							Inc. facility, Men		IIS, VVI.
PHYSICAL CONDITION:		/		1	nis te				er facility; located		
SUITABILITY FOR INTEN		V		5000 WARREN ROAD / BURLINGTON, WI 53105							
OUTABILITY FOR INTER	DED OOE		*** FI	_		RESULTS ***					
	T	AS FO					AS LEFT		Т	OLERANC	ES
TEST POINT	EXPECTED VALUE	MEASURED VALUE	ERROR	ACCEPT	REJECT	MEASURED VALUE	ERROR	ACCEPT	LOW LIN	fit I	HIGH LIMIT
	77202	1111011		SC	CALE						
DISTRIBUTION	1000	1000	0	آء		1000	0	/	T	995	1005
DISTRIBUTION	2000	1995	457	1	_	9000	0	/	1	995	2005
DISTRIBUTION	3000	2985	<157			3000	0	1		990	3010
			/	\vdash	-		0	/		990	4010
DISTRIBUTION	4000	3980	307		~	4000		1	_	1990	5010
DISTRIBUTION	5000	4980	4207	\vdash	V	5000	0	/		980	10,020
DISTRIBUTION	10,000	9965	3357			10,000	Ó			,970	15,030
DISTRIBUTION	15,000	14960	(40)	\vdash	-	15000	0	/		,960	18,040
DISTRIBUTION	18,000	17955	<45>	\vdash	V	18000	0	1	111	,900	10,040
	-	-		\vdash	_	-		-			
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							D CONFIDENC				
☐ ESTIMATED UNCERTA									DENCE LEVEL OF		
UNCERTAINTY OF THIS			STATISTICAL C	ALCUL	ATION	ASSUMED EC	QUAL TO ± 50%	OF THE I	MINIMUM VALID D	IVISION.	
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				05.155		D 111 THE : 00:	NON COLOURIES	40 D40~	OF THIS DEPOSE		
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The serial number of	ans report is	(DOLLO IV)	64012			c report may r	Lot be duplical	+Q	W. HIMOH OURSE	or ourant	a coulo iilo
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Next scheduled Full	Calibration is du	e 9/20	U		Ne	xt Preventive	Maintenance v			A	
HEAR SCHEUUIGU I'UII	Campidadii is du	1100	Date	_					V	Date	

The calibration interval for this instrument is 12 months. The next scheduled full calibration is due September 30, 2011.

PHOTOGRAPHS

TABLE OF PHOTOGRAPHS

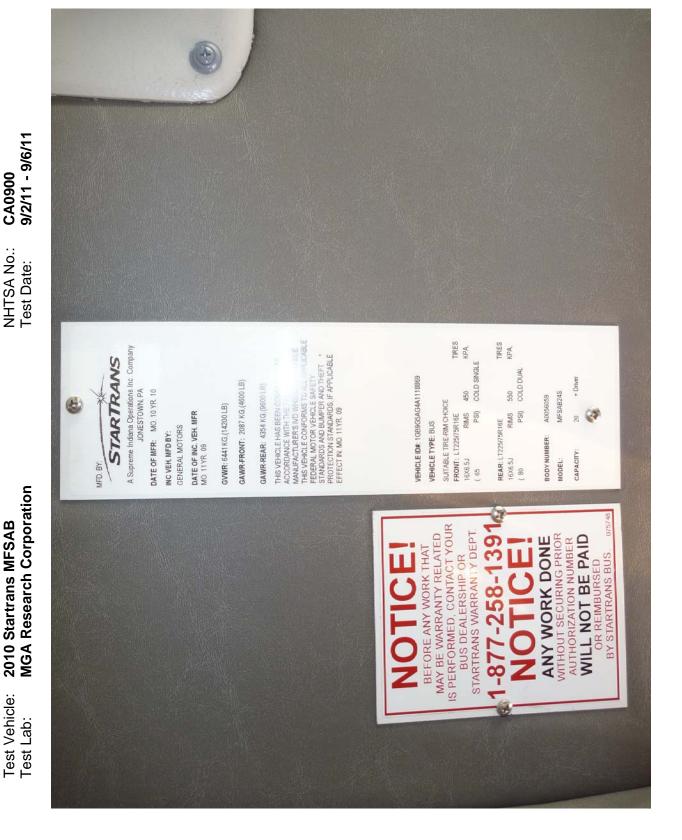
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Three-Quarter Frontal View of Left Side of Vehicle





2010 Startrans MFSAB MGA Research Corporation Test Vehicle: Test Lab:



NHTSA No.:

CA0900 9/2/11 - 9/6/11 INCOMPLETE VEHICLE MANUFACTURED BY NHTSA No.: Test Date: TYPE: INC VEH GVWR 6441KG(14200LB) GENERAL DETROIT, 1GB9G5AG4A1 MODEL: G33803



Tire Model Number and Tire DOT Serial Number



Tire Size Designation and Tire Load Ratings





Test Vehicle: 2010 Startrans MFSAB
Test Lab: MGA Research Corporation

DOT Symbol, Rim Manufacturer, Reference Designation Letter and Date of Manufacture



Test Vehicle: 2010 Startrans MFSAB
Test Lab: MGA Research Corporation



Vehicle on Scales Doing Measurement of Rear Axle Loads







Test Vehicle: 2010 Startrans MFSAB
Test Lab: MGA Research Corporation

CA0900 9/2/11 - 9/6/11

NHTSA No.: Test Date:



Lettering Height on Certification Label – Less Than 2.4 mm High

SECTION 6 LABORATORY NOTICE OF TEST FAILURE

LABORATORY NOTICE OF TEST FAILURE TO OVSC

Test Procedure:	FMVSS 120	Test Date:	September 6, 2011
Test Vehicle:	Startrans MFSAB	Test Lab:	MGA Research Corp.
NHTSA No.:	CA0900	Project Engineer:	Eric Peschman
Contract No.:	DTNH22-08-D-00075	Delivery Order No.:	1
MFR.:	Startrans	VIN:	1GB9G5AG4A1118869
Build Date:	10/2010		

TEST FAILURE DESCRIPTION

The height of the lettering on the certification label is less than 2.4 mm high.

FMVSS REQUIREMENTS DESCRIPTION

<u>Paragraph S5.3:</u> "Each vehicle shall show the information specified in S5.3.1 and S5.3.2 and, in the case of a vehicle equipped with a non-pneumatic spare tire, the information specified in S5.3.3, in the English language, lettered in block capitals and numerals not less than 2.4 millimeters high and in the format set forth following this paragraph"

Remarks: No remarks.

Notification to NHTSA (COTR): <u>Lawrence Valvo</u>

Date: September 6, 2011

By: Esselve