

Compliance Assessment on Single Unit Truck for Demountable Concepts, Inc.

This report is a Compliance Assessment for Demountable Concepts, Inc. (Demountable) regarding compliance of its completed single unit truck with Federal Motor Vehicle Safety Standard (FMVSS) 108, *Lamps, Reflective Devices, and Associated Equipment*, and the certification labeling requirements in the Code of Federal Regulations (CFR) Part 567, established by the National Highway Traffic Safety Administration (NHTSA).

Demountable retained Lindsey Research Services, LLC (LRS) to perform a compliance assessment of the various lamps, reflective devices, and the certification label installed on its completed single unit truck for which it is the final stage vehicle manufacturer. Von Lindsey and George Soodoo conducted an on-site assessment at the Demountable facility in Glassboro, New Jersey on Friday, May 25, 2018. Mr. Lindsey has 20 years of experience providing data and consulting services to manufacturers regarding reporting requirements of NHTSA. Mr. Soodoo is a retired NHTSA Division Chief with over 30 years of experience developing and promulgating crash avoidance Federal motor vehicle safety standards.

The objective of this assessment is to ascertain the compliance status of a Demountable-completed single unit truck with FMVSS 108 and Part 567 and provide any recommendations for reconciling any discrepancies in compliance. LRS conducted only a visual assessment of the various lighting devices and did not perform any performance evaluations. The following four tasks were completed as part of the assessment:

1. Report on Demountable current standing as a registered manufacturer based in the U.S.
2. Review and present lighting and reflector requirements that apply to Demountable trucks
3. Inspect current units to assess compliance with applicable Federal regulations and safety standards
4. Report upon completion of inspection



Based on a review of the [NHTSA manufacturer database](#), Demountable is currently registered as a manufacturer based in the U.S.



DEMOUNTABLE CONCEPTS, INC.

Common Name
Previous Legal Name
URL
All Company DBAs
Trade/Brand Names
Principal Name RUSTIN CASSWAY
Principal Position
Address 200 ACORN RD.
 GLASSBORO, NJ 08028

Contact Name RUSTIN CASSWAY
Contact Position
Contact Business
Phone
Business Fax Number
Contact Business Email
Production Start Date
Production End Date
Parent Company
Updated On 11/19/2015

Makes and Models

Demountable Concepts Demountable Concepts

Manufacturer Types

Type Intermediate Manufacturer, Final-Stage Manufacturer

Vehicle Types

Is Primary	Vehicle Type	GVWR From	GVWR To
<input checked="" type="checkbox"/>	Truck	Class 2F: 7,001 - 8,000 lb (3,175 - 3,629 kg)	Class 8: 33,001 lb and above (14,969 kg and above)

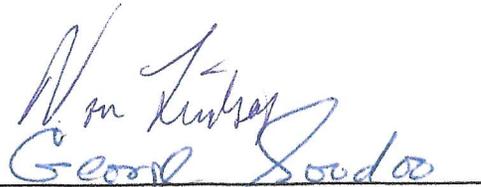
Action History

Submission/Letter Date	Reference
9/29/2006	ORG2487
10/25/2005	ORG802

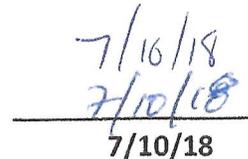
LRS reviewed all of the lighting and reflector requirements in FMVSS 108 and has provided, in the table below, a description of each lamp and reflective device required by that standard for a single unit truck. The table includes the specific requirements for its mounting location, mounting height, quantity of that specified lamp, color of the lens, spacing between specified lamps, and the "DOT" marking on each lens. In the last column to the right, LRS makes a pass/fail assessment based on visual inspection. In summary, LRS has determined that the vehicle we inspected was equipped with all of the required lights and reflective devices and complied with the criteria listed above. Pictures of some of the lamps are in Figure 1.

As a final stage vehicle manufacturer, Demountable is required to install a certification label in accordance with CFR Part 567.5, which specifies *Requirements for Manufacturers of vehicles manufactured in two or more stages*. For a final-stage manufacturer, these requirements (Part 567.5(d)) include specifications and information that must be on the certification label, which include the gross vehicle weight rating (GVWR), the gross axle weight rating (GAWR), and a certification statement regarding vehicle completion in accordance with prior manufacturers' incomplete vehicle document (IVD), among others. LRS determined that the vehicle we inspected met all the certification labeling requirements for which Demountable is responsible as the final stage manufacturer. A picture of the certification label is in Figure 2.

LRS believes that the demountable body and its contents, which are loaded onto the vehicle, are the cargo that the truck is designed to carry. Hence, we considered the lamps and reflector devices on the cargo to be installed at the option of the manufacturer and not a mandatory installation. Based on our visual assessment, we conclude that Demountable Concepts, Inc. is in compliance with the requirements of FMVSS 108 as it pertains to mounting location, mounting height, quantity, color, spacing, and markings of the required lamps and reflective devices, and also with the certification labeling requirements of Part 567 for final-stage manufacturers.



Von Lindsey and George Soodoo
Lindsey Research Services, LLC.



7/16/18
7/10/18

Vehicle Inspected: 3ALACWFCXKDKL5925

CHECKLIST FOR FMVSS 108

(Lamps, Reflective Devices, and Associated Equipment)

Prepared by:

Lindsey Research Services, LLC

FMVSS 108 CHECKLIST FOR DEMOUNTABLE CONCEPTS - SINGLE UNIT TRUCKS [TP 108-13](#)

Lamp, Reflective Device	FMVSS 108	Mounting Location	Mounting Height	Quantity	Color	Device Activation	Spacing	Markings	Visual Compliance Pass/Fail
Front turn signal lamp	S7.1.1	On the front; same height; symmetrically about vertical center line	Not less than 15 in; not more than 83 in	2	Amber	Flash when turn signal flasher activated	As far apart as practicable	"DOT"	Pass
Rear turn signal lamp	S7.1.2	On the rear; same height; symmetrically about vertical center line	Not less than 15 in; not more than 83 in	2	Amber or Red	Flash when turn signal flasher activated	As far apart as practicable	"DOT"	Pass
Tail lamp	S7.2	On the rear; same height; symmetrically about vertical center line	Not less than 15 in; not more than 72 in	2	Red	Steady burning; must be on when H-lamps are on, or when parking lamps are on for trucks < 80 in. wide	As far apart as practicable	"DOT"	Pass
Stop lamp	S7.3	On the rear; same height; symmetrically about vertical center line	Not less than 15 in; not more than 72 in	2	Red	Activated when service brakes are applied	As far apart as practicable	"DOT"	Pass
Front Side marker lamp	S7.4	On each side	Not less than 15 in	2	Amber	Steady burning; must be on when H-lamps are on, or when parking lamps are on for trucks < 80 in. wide	As far to the front as practicable	"DOT"	Pass

Lamp, Reflective Device	FMVSS 108	Mounting Location	Mounting Height	Quantity	Color	Device Activation	Spacing	Markings	Visual Compliance Pass/Fail
Intermediate Side marker lamp – <i>[For trucks 30 feet or longer]</i>	S7.4	On each side	Not less than 15 in	2	Amber	Steady burning; must be on when H-lamps are on, or when parking lamps are on for trucks < 80 in. wide	Near midpoint between front and rear side marker lamps	“DOT”	Pass
Rear Side marker lamp	S7.4	On each side	Not less than 15 in	2	Red	Steady burning; must be on when H-lamps are on, or when parking lamps are on for trucks < 80 in. wide	As far to the rear as practicable	“DOT”	Pass
Clearance lamp – <i>[For trucks 2032 mm or more in overall width]</i>	S7.5	On the front, to indicate overall width of vehicle; at same height.	As near the top as practicable	2	Amber	Steady burning		“DOT”	Pass
		On the rear, to indicate overall width of vehicle; at same height		2	Red	Steady burning			

Lamp, Reflective Device	FMVSS 108	Mounting Location	Mounting Height	Quantity	Color	Device Activation	Spacing	Markings	Visual Compliance Pass/Fail
Identification lamp – <i>[For trucks 2032 mm or more in overall width]</i>	S7.5	On the front	As near the top as practicable	3	Amber	Steady burning	As close to vertical centerline, with lamp centers not less than 6 in. or more than 12 in. apart.	“DOT”	Pass
Identification lamp – <i>[For trucks 2032 mm or more in overall width]</i>	S7.5	On the rear	As near top as practicable	3	Red	Steady burning	As close to vertical centerline, with lamp centers not less than 6 in. or more than 12 in. apart.	“DOT”	Pass
Backup lamp	S7.6	On the rear	No Requirement	1	White	Steady burning; ignition ON and reverse gear engaged		“DOT”	Pass
License plate lamp	S7.7	On the rear; illuminate license plate from top or sides	No requirement	1	White	Steady burning; must be on when H-lamps are on, or when parking lamps are on for trucks < 80 in. wide		“DOT”	Pass
Parking lamp - <i>[For trucks less than 2032 mm in overall width]</i>	S7.8	On the front at same height	Not less than 15 in; not more than 72 in	2	Amber or white	Steady burning; must be on when H-lamps are on		“DOT”	Not Applicable
High-mounted stop lamp	S7.9	Not required on vehicles in overall width of 2032 mm or greater and with a GVWR greater than 10,000 lb							
DRL	S7.10	Permitted but not required on trucks							

Lamp, Reflective Device	FMVSS 108	Mounting Location	Mounting Height	Quantity	Color	Device Activation	Spacing	Markings	Visual Compliance Pass/Fail
Reflex reflector	S8.1	On each side;	Not less than 15 in; not more than 60 in	2	Amber		As far to front;	"DOT"	Pass
		On each side;		2	Red		As far to rear;		
		On the rear, at same height, symmetrical about vertical center line		2	Red		As far apart as practicable		
Intermediate reflex reflector – <i>[For trucks 30 feet or longer]</i>	S8.1	On each side, at or near midpoint between front and rear side reflex reflectors	Not less than 15 in; not more than 60 in	2	Amber			"DOT"	Pass
Headlamp – Lower beam	S10	On the front	Not less than 22 in; and not more than 54 in		White	Steady burning	As far apart as practicable	"DOT"	Pass
Headlamp – Upper beam	S10	On the front	Not less than 22 in; not more than 54 in		White	Steady burning	As far apart as practicable	"DOT"	Pass

Figure 1 - Pictures of selected lights and reflective devices on Completed Demountable Truck







Figure 2 - Picture of Certification Label installed by Demountable

