

DRAFT  
10/17/95

Ms. Kathleen DeMeter  
Director, Office of Defects Investigation  
National Highway Traffic Safety Administration  
Washington, D.C. 20590

RE: NHTSA EA 92-018

Dear Ms. DeMeter:

Thank you for meeting with us on Tuesday, October 10.

This letter confirms our discussions at that meeting, in which we informed you of Nissan's intention to commence a service campaign to replace the fuel injectors and related hoses in two model lines: Nissan Maxima (MY's 1985-1988) and Nissan 300ZX (MY's 1984-1989).

The service campaign, which will be offered to all owners of the vehicles identified above, without regard to the age of the vehicle, will include the following elements:

- The letter to each customer will contain the following language in a prominent location:  
  
*Fuel leaks in your engine could result in a fire. A fire in your engine could pose a safety risk. To reduce the risk of engine fires, Nissan will replace all the engine hoses and fuel injectors in your vehicle's engine, free of charge.*
- The customer letter will be sent first class or registered mail in an envelope marked on the outside with the legend IMPORTANT SAFETY NOTICES in red typeface.
- The customer mailing will be phased in, generally beginning with the older vehicles first, on a schedule developed to accommodate parts supply and dealer capacity issues. A specific schedule is still being developed, and will be provided to your office within 30 days.

- The customer letter will include a toll-free telephone number to call Nissan for further information.
- The customer letter will make reference to the NHTSA hotline.
- Nissan will voluntarily provide quarterly updates of the progress of the service campaign to your office.
- Nissan will voluntarily send a second "reminder" letter to owners who have not responded to the campaign, if the initial response rate to this campaign is below expectations.

It is our understanding that this service campaign sufficiently addresses the issues raised in EA 92-018. We will provide you with a draft of the owner notification letter for your review and comment before we send it to our customers.

Please provide us with a copy of the closing resume when it is available.

Sincerely,

[Nissan official]



**NISSAN MOTOR CORPORATION  
U.S.A.**

November 30, 1995

Ms. Kathleen DeMeter, Director  
Office of Defects Investigation,  
Enforcement  
National Highway Traffic Safety Administration  
400 Seventh St., S.W.  
Washington, D.C. 20590

Ref: EA92-018

Dear Ms. DeMeter:

This is a follow-up to our letter of October 27, 1995 in which we indicated we would provide you the schedule for the service campaign.

We plan to mail service campaign bulletins to dealers in January 1996. The owner mailings will be conducted on a phased basis over a period of about 15 months beginning in February 1996 with the owners of the older vehicles generally being notified first. We are notifying the owners on a phased basis because of limitations on parts availability due to the production rate of the new fuel injectors and dealer capacity to perform campaign repairs. Dealers will be instructed to repair any vehicles which are experiencing a fuel leak even if the owner has not yet received the campaign notification.

Very truly,

A handwritten signature in cursive script that reads "Frank D. Slaveter".

Frank D. Slaveter  
Manager, Technical Compliance

FDS\ss

DRAFT

1/11/86

Dear Nissan Owner:

Nissan has received reports of leaks in the fuel injection system in 1985-1989 Maxima and 1984-1989 300ZX vehicles. Fuel leaks in your engine could result in a fire. A fire in your engine compartment would pose a safety risk. To reduce the risk of engine fires, Nissan will replace all of the fuel injectors and related hoses on your car, free of charge, regardless of your car's age or mileage. We are taking this step because we are concerned about your safety and satisfaction, even though we do not believe that these fuel leaks are due to any defect in your vehicle.

The fuel injection system in your car was designed in the early 1980's using state-of-the-art technology at that time. Since then, however, certain fuel additives have been approved for use in gasoline. These additives have resulted in deterioration of the fuel injectors, causing fuel leaks. In addition, fuel hoses that wear out due to age can leak fuel, contributing to the risk of fire. Nissan's recommended maintenance practices call for the replacement of deteriorated injectors and worn out fuel hoses in the fuel injector systems of these vehicles. Nissan has become concerned that some owners have postponed or omitted necessary maintenance of their vehicles' fuel injection system due to the expense, therefore increasing the risk of engine fire.

Nissan urges you to take advantage of this free fuel injector and related fuel hose replacement offer. The new fuel injectors have been made to reduce the effects of additives used in today's gasoline and the new fuel hoses will further reduce the possibility of leaks. After the new injectors and hoses are installed, it will continue to be important for you to follow the recommended maintenance schedule for the fuel injection system, including an inspection every 30,000 miles.

Contact your Nissan dealer as soon as possible to arrange for an appointment to have this free replacement service. The replacement will take approximately 2 hours, but your dealer may require your vehicle for a longer period of time based upon work schedules. Please bring this notice with you when you keep your appointment. Instructions have been sent to your dealer. If the dealer fails, or is unable to make the necessary repairs free of charge, you may contact the National Consumer Affairs Office, Nissan Motor Corporation in U.S.A. at P.O. Box 191, Garden, California 90248-0191. The toll free telephone number is: 1-800-NISSANI (1-800-647-7261). If you reside in Hawaii, please call: 808-836-0884.

The National Highway Traffic Safety Administration has a toll free auto safety hotline which can provide information to you concerning auto safety issues. Their number is: 1-800-424-9393 (Washington, D.C. area residents may call: 202-366-0123).

If you have paid to have your fuel injectors replaced due to leakage, Nissan will reimburse you for reasonable documented costs. Please complete the enclosed Customer Goodwill Reimbursement Request Form and submit it along with all supporting documents to the address indicated. Nissan is taking this action to ensure your continued satisfaction with our products.

Thank you for your cooperation. We hope that you will take advantage of this important and unique program. We look forward to serving your automotive needs now and for many years to come.



**NISSAN NORTH AMERICA, INC.**

May 16, 2000

Mr. Jonathan D. White  
Chief, Recall Analysis Division  
Office of Defects Investigation  
Safety Assurance  
National Highway Traffic Safety Administration  
Washington, D.C. 20590

Ref: 95I-006

Dear Mr. White:

This follows up our phone conversation today concerning the subject voluntary service campaign.

As of the end of April 2000, about 437,000 vehicles have been corrected. This compares to 375,000 corrections two years ago. Based on the number of registered vehicles at the start of the campaign (582,000), the correction rate has improved from 64% to 75%. We estimate the number of vehicles currently on the road to be 520,000. If this is used as the vehicle population, then the current correction rate is 84%. We continue to see a significant number of additional vehicles repaired each month, slightly over a thousand for the month of April, so that the correction rate will continue to increase. As I told you in our call, we have all of the campaign parts in inventory to continue to support the campaign.

If you will provide us with the name and address information for the owner contacts that NHTSA has received, we will attempt to contact the owners.

Very truly,

Frank Slaveter  
Corporate Manager  
Technical Compliance



U.S. Department  
of Transportation

National Highway  
Traffic Safety  
Administration

400 Seventh Street, S.W.  
Washington, D.C. 20590

JUL 17 1997

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Mr. Frank D. Slavator  
Manager, Technical Compliance  
Nissan Motor Corporation U.S.A.  
P.O. Box 191  
Gardena, CA 90248-0191

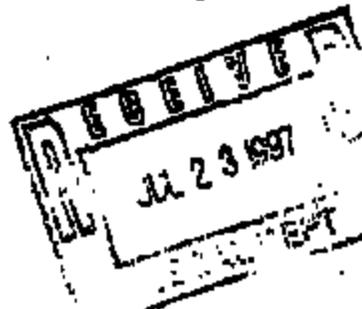
NSA-J11wb1  
OR97-047

Dear Mr. Slavator:

The Office of Defects Investigation of the National Highway Traffic Safety Administration (NHTSA) is reviewing the performance of safety improvement campaign 95I-006, being conducted by Nissan Motor Corporation U.S.A. (Nissan). Safety improvement campaign 95I-006 is being conducted by Nissan as an extended warranty campaign but is being monitored by NHTSA as if it were a safety recall campaign. This recall involves 721,565 Nissan 300ZX and Maxima vehicles manufactured from July 1984 through July 1989 in which the fuel injectors can leak fuel. NHTSA records pertaining to this recall campaign indicate that owner notification began March 15, 1996.

Through the first quarter of 1997 (37th reporting quarter), Nissan reports that 286,708 of the 721,565 vehicles involved have been inspected or otherwise accounted for, resulting in a completion rate of 40 percent. Nissan also reports that 45,716 vehicles are unreachable for inspection due to various reasons. The completion rate achieved for this safety recall campaign is below what we would expect from Nissan based on completion rates achieved on similar safety recall campaigns. The high number of unreachable vehicle owners also concerns us since those owners represent 11 percent of the non-inspected or otherwise unaccounted for vehicles. Therefore, pursuant to 49 U.S.C. §30165, 30166, and 30119, Nissan is requested to notify owners, involved in recall 95I-006, who have not had their vehicles corrected or otherwise accounted for. Nissan is requested to conduct the owner notification consistent with the guidelines listed below.

1. Identify the source(s) of the owner names and addresses used by Nissan: (a) when the campaign was first initiated and (b) in any follow-up notification by Nissan. Discuss



ALTO SAFETY HOTLINE  
1-800-424-2333  
Wash. D.C. Area (703) 298-0123

and describe the procedures used by Nissan to conduct the notification(s). Identify and describe whether Nissan utilizes any type of postal address certification program to verify the accuracy of the addresses contained in the owner lists.

2. Before conducting the owner notification, Nissan should obtain an updated owner list for this recall campaign, based on current state motor vehicle registration records.
3. Nissan's proposed owner notification letter for this recall must meet the requirements of 49 U.S.C. §30119 and should be submitted to NHTSA for review before owner notification begins.
4. In addition to the six quarterly status reports required under Federal Regulation 49 CFR Part 573.6, "Quarterly Reports," Nissan is requested to file three additional quarterly status reports for the third and fourth quarters of 1997 and the first quarter of 1998 that are in accordance with Part 573.6. The public notification and remedy campaign will be closely monitored by this office and should additional quarterly reports be necessary, Nissan will be advised.
5. Nissan is requested to provide the following information concerning the proposed schedule for conducting the owner notification:
  - a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
  - b. the approximate date on which the revised owner list will be available to initiate owner notification;
  - c. the approximate date on which the owner notification will begin;
  - d. the approximate date on which the owner notification will be completed; and
  - e. if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment.
6. For the vehicles included under the quarterly report category "Failure To Receive Notice," identify the source(s) of information and describe the criteria used by Nissan to determine whether a vehicle should be placed in this category. Also, identify and describe the collection methods used to collect information for this category. Identify what action Nissan is taking to contact owners of these vehicles or otherwise resolve the disposition of these vehicles. Identify whether current state motor vehicle registration records are utilized to locate the current owner of a vehicle once Nissan deems the vehicle owner is unknown or when a recall notification letter is returned to Nissan as being undeliverable.

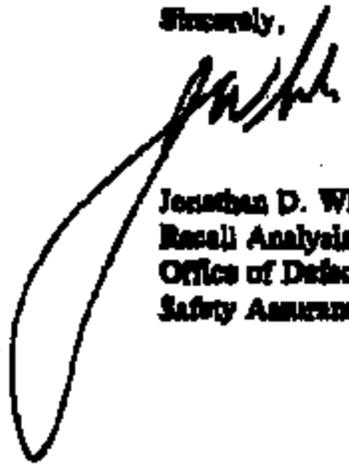
- 7. For the vehicles included under each of these quarterly report categories: "Export," "Theft," and "Scraping;" identify the source(s) of information and describe the criteria used by Nissan to determine whether a vehicle should be included under one of these categories. Also, identify and describe the collection methods used to collect information for each of these three categories.
- 8. Identify the date on which owner notification was completed for this recall.

It is important that Nissan respond to this letter on time. This letter is being sent to your company pursuant to 49 U.S.C. §30166 which authorizes NHTSA to perform any investigative activity that may be necessary to enforce Chapter 301 of Title 49. Your failure to respond promptly and fully to this letter could subject Nissan to civil penalties pursuant to 49 U.S.C. §30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. §30163.

The documents requested in this letter, referencing the identification codes on page 1, must be submitted to this office by August 12, 1997.

If you have any questions concerning this matter, please contact Mr. Bill Lewis of my staff at (202) 366-7265 or by fax at (202) 366-7882.

Sincerely,



Jonathan D. White, Chief  
 Recall Analysis Division  
 Office of Defects Investigation  
 Safety Assurance



**NISSAN MOTOR CORPORATION  
U.S.A.**

August 8, 1998

Mr. Jonathan D. White, Chief  
Recall Analysis Division  
Office of Defects Investigation  
Safety Assurance  
National Highway Traffic Safety Administration  
Washington, D.C. 20590

Ref: NSA-111wbl  
OR97-047

Dear Mr. White:

This is in response to your letter of July 17, 1997 concerning the completion rate on Nissan's voluntary service campaign to replace fuel injectors and related hoses on certain Nissan and Infiniti vehicles.

In your letter you state that the completion rate for this campaign according to Nissan's quarterly report for the first quarter of 1997 is 40 percent. Through July 17, 1997 the actual completion rate is estimated to be 71 percent. This is based on 331,740 completions out of an estimated 464,112 vehicles still on the road. The number of vehicles still in operation is significantly less than the number of vehicles originally sold because of the age of the vehicles, up to fourteen years old. The estimate of vehicles still in operation is based on statistics provided by R.L. Polk on percentage of vehicles registered by vehicle age for the entire vehicle fleet. Nissan projects that the completion rate at the end of the campaign will be in excess of 85 percent of vehicles still on the road. The very high current and projected completion rates surpass expectations and are due in part to the fact that many repair establishments have encouraged owners to take advantage of getting a new fuel injection system for free and owners have done so.

In our letter of October 27, 1995 to Kathleen DeMeter in which Nissan confirmed its intention to conduct a service campaign, we stated that Nissan would voluntarily send a second "reminder" letter to owners who have not responded to the campaign, if the initial response rate is below expectations. We certainly believe that the response rate has exceeded expectations and therefore see no need for an owner renotification.

You also express concern in your letter about the unreachable rate as reported being 11 percent. Actually, this unreachable rate is not unexpected for this campaign. This is because many of the vehicles are no longer in operation due to their age. Nissan used records from R.L. Polk to conduct this campaign. In the event that Polk does not have registration information on a particular vehicle, Nissan uses the owner name and address according to our sales records.

These records could be up to fourteen years old. However, in most cases where Polk does not have registration information, the vehicle is likely no longer on the road. Although Nissan uses its records for the owner name and address, in such cases we recognize that these records are often no longer valid and that many of these notifications will be returned as undeliverable. In Nissan's quarterly completion reports to NHTSA, undeliverable notifications are reported as "failed to receive notice". Vehicles are reported as "Export", "Theft" and "Stolen" based on information provided by the owner. We believe that the process of combining Polk data with our sales records demonstrates our reasonable efforts to reach owners of these vehicles. In the event that an owner does not receive a notification but does take their vehicle to a Nissan (Infiniti) dealer for some other reason, our dealers check to see if there are any uncompleted campaigns using the dealer service computer system.

We project even higher completion rates at the end of the campaign. Nissan has not yet completed mailing the owner notifications since the repair rate has been very high even among owners who had not yet been sent notices and because it has been necessary to extend the owner mailing to maintain an adequate inventory of parts to meet customer demand. We now anticipate completing mailing of the owner notifications by October 1997. For this reason, Nissan is willing to file three additional quarterly completion reports for the third and fourth quarters of 1997 and the first quarter of 1998.

Very truly,



Frank Slaveter

Manager, Technical Compliance