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November 5, 2014

Mr. Frank Borris
Director, Office of Defect Investigations
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington DC 20590

RE: Takata Inflator Recalls

Dear Mr. Borris:

Please accept the following as Nissan North America, Inc.'s ("Nissan") response to the letter dated October 29, 2014 from NHTSA Deputy Administrator Friedman. In that letter, Mr. Friedman requested that Nissan respond to a number of specific questions concerning the recent Takata inflator recalls, and directed that we submit our response to you.

As an initial matter, please let me emphasize that Nissan's primary focus, as always, is on the safety of our customers. As the agency is aware, Nissan has taken swift action in response to the information that we have received from Takata, and also in response to NHTSA's direction and requests. For example, when Takata first informed Nissan that it had identified a potential defect, Nissan simultaneously submitted a recall report. Likewise, when Takata later provided additional information, Nissan swiftly acted on that information and expanded the recall. Nissan promptly implemented NHTSA's request for a regional field action aimed at additional parts collection and analysis, and Nissan quickly acted upon information generated through Takata's testing of those returned parts. During the entire process, NHTSA's staff has been consistently engaged in coordinating a comprehensive approach to addressing this important safety issue.

By way of additional background, Takata first informed Nissan of a potential issue with certain inflators in February 2013. Nissan quickly investigated and, based on Takata's determination of a potential defect, took action by filing a Defect Information Report ("DIR") on April 11, 2013. In June 2014, Takata informed Nissan that the original population of potentially defective inflators needed to be expanded. Nissan responded by promptly filing an amended DIR on June 24, 2014.

In early June 2014, Nissan also learned that Takata had shared information with NHTSA regarding six Takata inflator-related incidents in Florida and Puerto Rico, which involved several OEMs. Nissan participated in a call initiated by agency staff in which NHTSA requested that several manufacturers, including Nissan, participate in a regional field action in Florida, Puerto Rico, Hawaii and the U.S. Virgin Islands. Nissan understood that the agency was particularly concerned with Takata inflators in states and territories with high absolute humidity. Nissan immediately agreed to participate in this effort, and supplied Takata with returned parts (all from Florida) for testing and analysis.

On October 22, 2014, Takata informed Nissan of the results of its testing, which concluded that one of the 159 tested inflators had failed. The very next day, Nissan decided to expand the regional field action and to recall vehicles in certain coastal areas. Nissan discussed the appropriate geographic scope with NHTSA, and the agreed upon scope was reflected in the DIR that Nissan filed on October 30, 2014. That DIR addresses the same model vehicles as the field action but covers a larger geographic area along the Gulf Coast and certain Pacific islands with high absolute humidity. It includes Florida and adjacent counties in Southern Georgia; Puerto Rico; Hawaii; the U. S. Virgin Island; Guam; Saipan; American Samoa; as well as the coastal areas of Alabama, Louisiana, Mississippi and Texas.

Consistent with available information and our ongoing discussions with the agency, Nissan is committed to addressing vehicles in areas with high absolute humidity first. As of today, Nissan believes it has a sufficient supply of replacement inflators to service its vehicle population in those high absolute humidity regions. Further, Nissan supports a comprehensive plan in which Takata will supply affected manufacturers with replacement parts that will enable them to service vehicles in the high absolute humidity states and territories. Nissan will continue to cooperate and coordinate with the agency and other manufacturers to promote the overall safety of the public.

Finally, we note that Mr. Friedman's October 29 letter asks Nissan to provide you with weekly information updates. Please be assured that Nissan will keep NHTSA updated on an ongoing basis.

We appreciate the opportunity to share this information with you. Nissan's responses to NHTSA's specific information requests are set forth below. Please note that Nissan may supplement our responses at a later date as warranted.

Responses to Specific Information Requests

Question 1

The steps that you will take to (a) expedite Takata's production of replacement air bags; (b) expand the supply of replacement air bags by obtaining replacement air bags from other suppliers; (c) accelerate distribution of replacement air bags to repair facilities; and (d) urge and incentivize your dealers to increase the number of vehicles repaired.

Responses:

1(a). Nissan currently expects to be able to service all vehicles within the high absolute humidity regions with existing inventory, and also continues to urge Takata to increase production of replacement inflators as much as possible. Nissan agrees with NHTSA that the most immediate need is within these high absolute humidity states and territories, and that those areas should be given top priority. Nissan supports a comprehensive plan to fulfill all manufacturers' needs within those areas before supplying replacement inflators to the remaining areas where issues have not been observed.

1(b). Obtaining replacement inflators from a supplier other than Takata is not feasible in this case, because the replacement inflators would require re-engineering and validation to ensure sufficient quality and safety and integration into vehicles. More specifically, each vehicle has a unique and finely tuned airbag which is optimized for its specific vehicle environment. Factors such as vehicle layout, crash pulse, and sensor performance vary from vehicle to vehicle and air bag parameters are tuned to achieve optimal performance within each unique vehicle. Parameters such as air bag volume/shape, vent hole diameter, tether length, and crash sensor performance may need to be adjusted to compensate for variation in inflator performance. Additionally, airbag module hardware may need to be modified in order to accommodate various sizes and footprints of inflators. For these

reasons, Nissan believes that the risk is best abated by increasing production of inflators that have been engineered and tested specifically for use in the subject vehicles.

1(c). Replacement inflators are being distributed to repair facilities on an expedited basis. A total of 12,216 parts are currently available at dealers, and 48,555 additional parts are currently at Nissan warehouses available for next day delivery to dealer upon order. Nissan believes it has a sufficient supply of replacement inflators to service its vehicle population in high absolute humidity regions. A summary of the parts available at the present time is as follows:

	Part Number	Parts at Dlrs	Parts at Nissan
Pathfinder/QX4 (R50/JR50)	KH5FA-7993D	3,270	1,701
Maxima/I30-35 (A33/CA33)	K8E61-7994D	4,997	14,348
FX35-45 (S50)	K8561-7994D	998	1,209
M35/45 (Y50)	K85FA-7994D	0	0
Sentra (B15)	98561-4Z60A	2,951	33,809

1(d). Nissan's dealers are aware of the recalls and the significance of conducting the repairs. Nissan has informed its dealer network of the importance of performing these recalls via multiple notices and specifically urged dealers to encourage inquiring customers to have their vehicles remedied. These efforts will continue.

Question 2

The measures (including innovative approaches) that you will take to encourage and incentivize vehicle owners to bring their vehicles in for repair (*e.g.*, expanding service hours for more convenience, accommodating owners whose vehicles cannot immediately be repaired by providing loaner vehicles, and the use of print, radio, television, and social media to inform vehicle owners of the recall program).

Response:

Nissan is committed to communicating with vehicle owners about the importance of this recall. Indeed, as already reported to NHTSA, Nissan is taking the extraordinary approach of using Federal Express to deliver the campaign mailings to customers with traceability. A Federal Express envelope should draw owner's attention more than the standard first-class mailing. Nissan also will promote the recall on the company's website, and is considering a variety of social media and other available tools to reach consumers. Nissan will monitor the customer response to the campaign carefully and will take all reasonable actions to encourage vehicle owners to respond.

Question 3

The efforts you will make to maintain clear, thorough, and up-to-date information regarding the recall on your website, and within your dealer network, to better inform consumers.

Response:

Nissans and Infiniti Recall VIN lookup pages (<http://www.nissanusa.com/recalls-vin#/> and <http://www.infiniti.com/recalls-vin#/>) are updated with the affected vehicles as soon as they are identified. Nissan's customer call center representatives, as well as its dealers, are prepared to answer questions and to encourage owners to respond to the Federal Express package when they receive it and to have their vehicle repaired.

Question 4

Any other interim measures you have taken or can take to address the safety risk and up-to-date information on the number of loaner vehicles you have provided.

Response:

Nissan has sufficient inventory to replace the inflators in the states and territories of high absolute humidity. Nissan will consider whether or not to disable passenger airbags, with an appropriate warning not to use the passenger seat, if Nissan faces an unexpected shortage of parts. Nissan is currently replacing airbag inflators with replacement parts in inventory, and its customers have not required loaner vehicles.

Question 5

A description of any ongoing efforts to evaluate the safety risks of Takata air bags in your vehicles, including a description of testing that is currently underway or planned.

Response:

As NHTSA is aware, the component-level tests require specialized equipment and facilities, such as ballistic chambers, which are built and maintained at the airbag supplier. For that reason, to date, Nissan has relied upon testing conducted by Takata, and has acted promptly based upon that testing. Nissan remains in regular communication with Takata to ensure that Nissan has current information. Separately, in light of the new information received from Takata, Nissan is in the process of retaining an independent engineering consulting firm to perform additional testing on Takata inflators.

Question 6

Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered within the hot, humid regions of the country identified in NHTSA's consumer advisory.

Response:

As discussed above, from July 2014 through October 2014, Nissan participated in a field action and parts collection effort in those high absolute humidity areas requested by NHTSA. Per the agency's direction, all of the collected inflators were shipped to Takata for testing. On October 22, 2014, Takata informed Nissan that out of 159 inflators tested, one inflator did not perform properly. Nissan promptly decided, in an abundance of caution, to expand the field action and recall vehicle models and model years that were previously included in the field action, but were sold or are currently registered within a larger geographic area along the Gulf Coast with high absolute humidity. This expansion includes portions of Alabama, Louisiana, Georgia, Mississippi and Texas in the U.S., along with Guam, Saipan and American Samoa.

Question 7

Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered outside of the hot, humid regions of the country identified in NHTSA's consumer advisory.

Response:

The parts collection and testing efforts to date have involved inflators in the states and territories of high absolute humidity, as defined by NHTSA. Nissan notes that when it began

conducting the nationwide inflator recall in 2013, the emphasis was on safe disposal of replaced inflators and no additional analysis was requested by the agency.

Nissan agrees with NHTSA that inflators in areas of high absolute humidity should be given priority. Incident data and Takata's test results indicate that affected inflators are more susceptible to malfunction in areas of high absolute humidity than areas outside of high absolute humidity. Nissan does not have an indication of a further potential issue outside the defined areas of high absolute humidity but will analyze the issue further.

Question 8

The testing protocols/methodologies used (or that will be used) to conduct or gather the information described in Nos. 5 through 7 above.

Response:

As discussed in response to Question 6, Nissan participated in a parts collection effort in those areas requested by the agency, and sent returned parts to Takata for testing and analysis. Nissan understands that Takata will provide details on the protocol/methodologies that it used.

Question 9

Up-to-date information regarding the number of vehicles covered by your recall, the number of those vehicles still in service and the number of vehicles remedied with a replacement air bag.

Response:

Recall 13V-136

<u>Model</u>	<u>Vehicles Covered</u>	<u>Vehicles in Service</u>	<u>Vehicles Remedied</u>
MY 2001-2003 Nissan Maxima	Approximately 164,669	To be supplemented	25,441
MY 2001-2003 Nissan Pathfinder	Approximately 31,825	To be supplemented	5,558
MY 2002-2003 Nissan Sentra	Approximately 172,940	To be supplemented	20,634
MY 2001-2003 Infiniti I30/I35	Approximately 59,382	To be supplemented	12,195
MY 2002-2003 Infiniti QX4	Approximately 7,722	To be supplemented	1,776
MY 2003 Infiniti FX	Approximately 1,764	To be supplemented	355
TOTAL:	438,302		65,959

Nissan plans to conduct a second mailing after the regional recall in areas of high humidity has been carried out. The information on vehicles still in service will be supplemented.

Recall 14V-361

<u>Model</u>	<u>Vehicles Covered</u>	<u>Vehicles in Service</u>	<u>Vehicles Remedied</u>
MY 2002-2003 Nissan Maxima	Approximately 83,264	To be supplemented	8,411

MY 2002-2003 Nissan Pathfinder	Approximately 67,080	To be supplemented	5,983
MY 2002-2004 Nissan Sentra	Approximately 15,173	To be supplemented	1,157
MY 2002-2003 Infiniti I35	Approximately 26,208	To be supplemented	4,081
MY 2002-2003 Infiniti QX4	Approximately 15,952	To be supplemented	1,847
MY 2003 Infiniti FX	Approximately 18,649	To be supplemented	1,388
TOTAL:	226,326		22,867

Nissan plans to conduct a second mailing after the regional recall in areas of high humidity has been carried out. The information on vehicles still in service will be supplemented.

Regional Field Action 14V-340

<u>Model</u>	<u>Vehicles Covered</u>	<u>Vehicles in Service</u>	<u>Vehicles Remedied</u>
MY 2003-2004 Nissan Pathfinder	Approximately 3,563	To be supplemented	479
MY 2004-2006 Nissan Sentra	Approximately 18,097	To be supplemented	1,576
MY 2003-2005 Infiniti FX35/FX45	Approximately 6,203	To be supplemented	542
MY 2003-2004 Infiniti I35	Approximately 1,780	To be supplemented	513
MY 2006 Infiniti M35/M45*	Approximately 355	To be supplemented	0
TOTAL:	29,998		3,110

*Interim letter mailed

Nissan plans to conduct a second mailing as a part of Recall 14V-701. The information on vehicles still in service will be supplemented.

Recall 14V-701

<u>Model</u>	<u>Vehicles Covered</u>	<u>Vehicles in Service</u>	<u>Vehicles Remedied</u>
MY 2003-2004 Nissan Pathfinder	Approximately 2,900	To be supplemented	n/a
MY 2004-2006 Nissan Sentra	Approximately 13,289	To be supplemented	n/a
MY 2003-2005 Infiniti FX35/FX45	Approximately 4,921	To be supplemented	n/a
MY 2003-2004 Infiniti I35	Approximately 1,320	To be supplemented	n/a
MY 2006 Infiniti M35/M45	Approximately 308	To be supplemented	n/a
TOTAL:	22,738		

Question 10

Information on the testing, if any, you have done on the replacement air bags.

Response:

Nissan defers to Takata to provide details on the testing for new replacement inflators. Takata has informed Nissan that the replacement inflators meet production specifications and quality controls.

Thank you and best regards,

A handwritten signature in black ink, appearing to read 'Selim Hammoud', with a stylized flourish at the end.

Selim Hammoud
Director, Product Safety