



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE.  
Washington, DC 20590

NOV 20 2009

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Kazou Higuchi  
Takata, Inc.  
888 16<sup>th</sup> Street, NW, Suite 800  
Washington, DC 20006

NVS-215/jtt  
09V-259/08V-593  
RQ09-004

**Re: Information Required on Airbag Inflators Subject to  
Safety Recalls 08V-593 and 09V-259**

Dear Mr. Higuchi:

This serves as a request for further information concerning the airbag inflators subject to Safety Recalls 08V-593 and 09V-259. Those recalls involve certain 2001 and 2002 model year Honda Accord, Civic, and Acura 3.2 TL vehicles which Honda Motor Co., Ltd. (Honda) decided contain a safety-related defect. As explained in Honda's defect information reports filed in this matter, the driver's airbag inflator may produce excessive internal pressure that, in the event of airbag deployment, could cause the inflator to rupture. This rupture could cause metal fragments to pass into the vehicle compartment possibly causing injury to vehicle occupants.

Safety Recall 09V-259 is an expansion of 08V-593. After receipt of the defect information report on 09V-259, the Recall Management Division (RMD) requested Honda supply additional information to understand why the company did not include the vehicles involved in that recall population in Safety Recall 08V-593, and to evaluate the timeliness of the decision-making associated with the later recall. In its response, Honda shared that TK Holdings, Inc. (Takata) was its supplier for the airbags on the affected vehicles, and that it relied upon information from Takata in ascertaining both the cause of the defect and the production history of the inflators from which the recall populations were determined. A copy of Honda's response is enclosed.

Given Honda's reliance upon Takata in understanding and evaluating the safety defect, and in ascertaining the recall populations, the RMD requests additional information from Takata as to the sources and causes of the safety defect, the steps taken to identify the



defect and when those steps were taken, and what and when pertinent information was shared with Honda. In the interest of ensuring all affected vehicle products have been identified, we are also requesting information concerning Takata's distribution of the airbag inflators and any inflators which may have been impacted by those causes or sources involved in the Honda and Acura inflators. We have opened a Recall Query (RQ) investigation, identified as RQ09-004, to gather this information.

Please answer the following, repeating before each response the question asked. Please also produce copies of any documentation supporting your answers.

1. Did Takata manufacture, distribute or sell the same or substantially similar airbag inflators, in terms of design, production, or manufacturing, as are involved in either Safety Recall 08V-593 or 09V-259, for or to anyone other than Honda? If so, please identify each such entity by name, address, and phone number and provide your contact at that entity's name, address, and phone number. Also, for each such entity, state the total number of inflators that were distributed and the beginning and ending dates of their manufacture, serial or other identifying numbers. Identify all design or production changes, or any other factors, that determine those beginning and ending dates.

Also, please explain whether or not Takata believes these inflators present the same or similar safety defect as those involved in Safety Recalls 09V-259 and 08V-593. Provide any supporting information or documentation that supports this opinion.

2. Honda informed NHTSA that based on information from Takata, it understands the cause of the defect to be related to a production process involving one of several compression presses used to form the propellant into wafers that were then installed into the inflator modules. Please identify and explain in detail what this production process was, and produce any pictures, diagrams, or other documentation necessary to help understand the process. Please state whether Takata agrees with Honda's assessment that this production process is the cause of the safety defect Honda identified and provide the reason(s) for Takata's opinion.

3. Did Takata manufacture, distribute or sell any airbag inflators that were subject to the same propellant chemistry or production process involved in the production of the Honda airbag inflators involved in Recalls 08V-593 or 09V-259, to anyone other than Honda? If so, please identify each such entity by name, address, and phone number and provide your contact at that entity's name, address, and phone number. Also, for each such entity, state the total number of inflators that were distributed and the beginning and ending dates of their manufacture, serial or other identifying numbers. Identify all design or production changes, or any other factors, that determine those beginning and ending dates.

Also, please explain whether or not Takata believes these inflators present the same or similar safety defect as those involved in Safety Recalls 09V-259 and 08V-593. Provide any supporting information or documentation that supports this opinion.

4. Honda informed NHTSA that it determined the vehicle population for Safety Recall 08V-593 was based on information from Takata concerning the causal factors and production history of the inflators. Honda reported that it understood the causal factors to be related to the airbag propellant and its handling during the inflator module's assembly. Please identify and describe in detail the sources or causes Takata believed to have contributed to the safety defect in the inflators involved in 08V-593, including in that description any pictures, diagrams, or other information helpful in understanding how Takata came to its opinion at the time. Please also state when Takata shared information with Honda concerning its opinions on the source or cause of the safety defect and produce copies of any communications, presentations, or other documentation that evidence this date.

5. Honda informed NHTSA that there is no design or other difference between the inflators involved in Safety Recalls 08V-593 and 09V-259. Please state whether or not Takata believes that this statement is correct? If not, please identify and describe in detail any differences, including in that description a copy of any pictures, diagrams, chemical composition, or other information helpful in understanding the differences.

6. Honda informed NHTSA that it and Takata now believe that any differences between the two vehicle populations in the two safety recalls, as well as any differences between the vehicles included in Safety Recall 09V-259 and those excluded from that campaign, relate to production of the airbag propellant prior to assembly of the inflators, as opposed to handling of the propellant during inflator assembly. Is this correct?

If so, how and when did Takata come to discover that the defect was due to a production process before assembly, and not handling of the propellant during assembly? State when Takata shared this information with Honda and with whom at Honda and produce copies of any communications, presentations, or other documentation that evidence this. Also, identify and describe any differences relating to production of the propellant prior to assembly between first, the inflators involved in Safety Recall 08V-593 and 09V-259, and then second, the inflators involved in 09V-259 and those excluded from that recall.

If not, explain why Takata does not agree with this assessment, include in your explanation a copy of any pictures, diagrams, or other information helpful in understanding Takata's opinion. Then state whether Takata shared its opinions with Honda, identify when it did so and with whom, and produce copies of any

communications, presentations, or other documentation that evidence this. To the extent not already explained earlier in response to this question, identify and describe any differences relating to production of the propellant prior to assembly between first, the inflators involved in Safety Recall 08V-593, and then second, the inflators involved in 09V-259 and those excluded from that recall.

7. Describe any responsibilities Takata had in identifying which inflators were affected by the safety defect in either or both Safety Recall 08V-593 and 09V-259, including in your description how Takata discriminated between an affected inflator and other inflators. State when Takata undertook its responsibilities, when it completed those responsibilities, and when it informed Honda of the identities of the affected inflators.

8. State the date and produce copies of each communication, including emails and presentations, in which Takata and Honda discussed whether there was a defect in the airbag inflators outside of those involved in Safety Recall 08V-593.

9. State the date and produce copies of each communication, including emails and presentations, in which Takata and Honda discussed whether the defect in the airbag inflators outside of those involved in Safety Recall 08V-593 was safety-related and/or the severity of the defect upon safety.

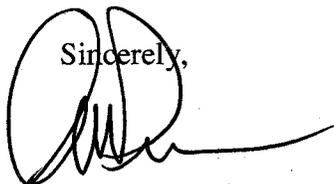
10. Separately for Safety Recall 08V-593 and 09V-259, please state the beginning and ending dates for shipments from Takata to Honda of the defective inflators.

This letter is issued pursuant to 49 U.S.C. § 30166 which authorizes the NHTSA to request any information that it deems necessary in administering and enforcing the Motor Vehicle Safety Act of 1969, as amended, 49 U.S.C. 30101, et seq. Failure to respond promptly, truthfully, and completely to this letter and the inquiries made herein could subject Takata to significant civil penalties and/or a claim for injunctive relief.

If Takata claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. §1905, the company must submit supporting information together with the materials that are the subject of the confidentiality request, to the Office of Chief Counsel, National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE, Washington, D.C. 20590. Please see 49 CFR Part 512 for further instructions as to what is required to properly file a request for confidential treatment.

Please provide your response to this letter within 3 weeks of its date.

Please direct your response to Jennifer Timian of my staff, and note conspicuously on your response the investigation number assigned to this matter (e.g., RQ09-004). Should you have any questions or concerns, please contact Ms. Timian on (202) 366-0209 or by email at [jennifer.timian@dot.gov](mailto:jennifer.timian@dot.gov).

Sincerely,  


George Person, Chief  
Recall Management Division

Enclosure