

Jeff
8/9/06



Sharon Kaplan/MMSA/MMCX

08/01/2006 07:22 AM

To Jeff.Quandt@dot.gov

cc Kent Reeves/MMSA/MMCX@MMCX-NA,
Andrea.Noel@dot.gov

bcc

Subject NVS-213-aan, RQ-06-007 Response Letter

Jeff,

In reviewing the "Request Number Two Data" CD, we found an error and need to correct the data. The file we sent earlier has two files (two reported twice) that should not have been included, as they do not relate to the accumulator. The "Runnels" case and the "King" case are allegations of brake failure, however the files indicate no relation to the accumulator and in both cases, there were no brake repairs following the accidents. Therefore it is highly unlikely that the accumulator was involved in the incidents.

Also, there is a case listed as "mediation" in the Access data set that should have been included as a CR file. Since it was not in the CR database, it was inadvertently left out of the complaint count (now 23) and a copy of the complaint was not included in the submission. Attached is a revised page 2 of the submission, a copy of the customer complaint ("Cox, File number 0329326), and a new "Request Number Two Data" data file.

We are sorry for any inconvenience and should you have any questions, please feel free to give me a call.

Best Regards,
Kent



REQUEST NUMBER TWO DATA.mdb Mediation Case - Cox.pdf RQ Response Ltr_page2.pdf

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MMSA
AUG 10 2006
10:00 AM



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NHTSA-213

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OFFICE OF DEFECTS
INVESTIGATION

5450 KATELLA AVENUE
CYPRESS, CALIFORNIA 90630-5208
(714) 372-6000

MAILING ADDRESS:
P.O. BOX 6400
CYPRESS, CALIFORNIA 90630-0004

July 28, 2006

Mr. Jeffrey L. Quandt, Chief
Vehicle Control Division
NHTSA Office of Defects Investigation

RE: NVS-213-aan, RQ-06-007

Dear Mr. Quandt:

Mitsubishi respectfully submits the requested information in response to Recall Query RQ-06-007. As discussed earlier with your office, Mitsubishi has limited the vehicles included in this RQ response to the 2001 and 2002 Mitsubishi Montero. The 2000 MY used a vacuum brake booster system with no accumulator and the 2003 MY used an "Active Skid Control" system which utilized a non-diaphragm type accumulator.

Based on our phone call and email of July 20, 2006 and approved by your office, this response includes questions 1 through 7, 11, and 12. The remaining responses to questions 8 through 10, 13 and 14 will be provided on or before August 24, 2006.

Databases for responses to questions 1, 2, 3, and 5 are attached in separate Access files, and are also provided by mail on a CD. Other attachments included with this submission are listed below. Should you have any questions or need additional information, you can reach me at one of the contact points listed below.

Sincerely,

Kent Reeves, National Manager
Product Support & Technical Compliance
Phone: 714-372-6362
Fax: 714-934-4242
Email: kreeves@mmsa.com

Attachment For Question No.	Description
4	Customer Complaints
4	Field Reports
6	Nature Code Chart
6	Cause Code Chart
7	SR-01-008
7	SR-01-008REV
7	SR-01-008REVII
7	ATIN-01-SR-010
12	Accumulator Parts Demand

Q.1. State, by model and year, the number of subject vehicles Mitsubishi has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Mitsubishi, state the following:

- a. Vehicle identification number (VIN)
- b. Make
- c. Model
- d. Model Year
- e. Date of manufacture
- f. Date warranty coverage commenced
- g. State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease)
- h. Whether the vehicle was subject to recall 01V-254
- i. Whether the subject recall repairs were performed
- j. Date the subject recall repairs were performed

A.1. The Microsoft Access file named "PRODUCTION DATA.mdb" provided in this mailing contains the above information in the format requested.

Q.2. State the number of each of the following, received by Mitsubishi, or of which Mitsubishi is otherwise aware, which relate to, or may relate to the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators
- b. Field reports, including dealer field reports
- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports
- d. Property damage claims
- e. Third-party arbitration proceedings where Mitsubishi is or was a party to the arbitration
- f. Lawsuits, both pending and closed, in which Mitsubishi is or was a defendant or co-defendant.

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "d," provide a summary description of the alleged problem and causal and contributing factors and Mitsubishi's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and data on which the complaint or other document initiating the action was filed.

A.2. The Microsoft Access file named "REQUEST NUMBER TWO DATA.mdb" provided in this mailing contains the above information.

Type	Total number
Item a. Customer complaints	23*
Item b. Field reports	10
Item c. Crashes involving injury	1**
Item d. Property damage claims	0

* Three customer complaints are also ODI cases No. 100111753, No. 10155605, & No. 10092744.

** This case was included in the ODI report under case No. 10092744.

For Items "c" and "d":

VIN	Summary	Causal/ Contributing Factors	Assessment	Significant Facts/ Evidence Summary
JA4MW31R82J054510	Customer states that brake pedal went to the floor upon trying to stop.	Unknown	Claim is unrelated to accumulator diaphragm damage.	Accumulator diaphragm damage is evidenced by noise when the brake pedal is pressed. Customer did not mention any such noise.

For items "e" and "f":

- ◆ There are no third-party arbitration proceedings related to the alleged defect in the subject vehicles.
- ◆ There are no lawsuits related to the alleged defect in the subject vehicles.

- Q.3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of the items in Request No. 2, state the following information:
- a. Mitsubishi's file number or other identifier used
 - b. Category of each item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.)
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number
 - d. Vehicle VIN
 - e. Vehicle make, model and model year
 - f. Vehicle's mileage at time of incident
 - g. Incident date
 - h. Report or claim date
 - i. Whether a crash is alleged
 - j. Whether property damage is alleged
 - k. Number of alleged injuries, if any
 - l. Number of alleged fatalities, if any
- A.3. **The Microsoft Access file named "REQUEST NUMBER TWO DATA.mdb" provided in this mailing contains the above information in the format requested.**
- Q.4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Mitsubishi used for organizing the documents.
- A.4. **Copies of these documents are provided in this mailing. The documents are organized by category, then date of report.**
- Q.5. State, by model and year, the total count for all of the following categories of claims, collectively, that have been paid by Mitsubishi to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for goodwill services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign

Separately, for each claim, state the following information:

- a. Mitsubishi's claim number
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number

- c. VIN
- d. Repair date
- e. Vehicle mileage at time of repair
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code
- g. Labor operation number(s)
- h. Problem code(s)
- i. Replacement part number(s) and description(s)
- j. Concern stated by customer
- k. Comment, if any, by dealer/technician relating to claim and/or repair

- A.5. The Microsoft Access file named "WARRANTY DATA.mdb" provided in this mailing contains the above information in the format requested. Among the total 1,299 warranty claims for the 2001 and 2002 model year Montero are 918 claims for old parts before recall launch and 276 claims for new countermeasure parts. Mitsubishi will discuss this further in our response to Question Number 14, which will be provided on or before August 24, 2006.**
- Q.6. Describe in detail the search criteria used by Mitsubishi to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part number and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Mitsubishi on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Mitsubishi offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.
- A. 6. Search criteria used:**
- ◆ 2001 and 2002 model year Montero models
 - ◆ Labor Operations beginning with "35" (our group number designation for Brakes)
 - ◆ Part numbers MR527718, MR977411, MR977223, and 4630A011

Labor operation numbers and labor operation descriptions applicable to the alleged defect in the subject vehicles are:

LABOR OPERATION NO.	DESCRIPTION
35000094	SERVICE BRAKES AIR BLEED
35121010	BRAKE BOOSTER ASSEMBLY REPL
35131000	HYDRAULIC BRAKE BOOSTER ASSEMBLY
35131010	HYDRAULIC BRAKE BOOSTER ASSEMBLY REPL
35131110	RESERVOIR TANK ASSY(HBB) REPL
35131310	HYDRAULIC BRAKE BOOSTER MASTER CYLINDER REPL
35131400	HYDRAULIC BRAKE BOOSTER ACCUMULATOR
35131410	HYDRAULIC BRAKE BOOSTER ACCUMULATOR R&R
35131510	HYDRAULIC BRAKE BOOSTER LEAD WIRE REPL
35131600	HYDRAULIC BRAKE BOOSTER PUMP MOTOR
35131610	HYDRAULIC BRAKE BOOSTER PUMP MOTOR REPL
35131710	MASTER CYLINDER&HYDRAULIC UNIT ASSY(HBB) REPL
35452000	HYDRAULIC UNIT ASSEMBLY
35840410	ABS HYDRAULIC UNIT VALVE RELAY REPL
35850110	ANTI-SKID (ABS) CONTROL UNIT REPL

Problem codes and problem code descriptions applicable to the alleged defect in the subject vehicles listed in the "Nature Code chart" and "Cause Code chart" provided with this mailing.

Terms of the new vehicle warranty coverage offered by Mitsubishi on the subject vehicles are:

- ◆ Basic coverage: 3 years/36,000 miles
- ◆ Powertrain coverage: 5 years/60,000 miles
- ◆ Restraint system coverage: 5 years/60,000 miles
- ◆ Anti-corrosion coverage: 7 years/100,000 miles
- ◆ Emission control system coverage:
 - Federal
 - Defects: Emission-related parts: 3 years/36,000
ECM, TCM, catalytic converter, OBD device: 8 years/80,000 miles
 - Performance: Emission-related parts: 2 years/24,000 miles
ECM, TCM, catalytic converter, OBD device: 8 years/80,000 miles
 - Calif., Mass., Vermont and Maine
 - Defects: Emission-related parts: 3 years/50,000
Long term 1: 7 years/70,000 miles
Long term 2: 8 years/80,000 miles
 - Performance: Emission-related parts: 3 years/50,000 miles
Long term 1: 7 years/70,000 miles
Long term 2: 8 years/80,000 miles

Extended warranty coverage options were not offered directly by Mitsubishi for the subject vehicles.

Q.7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Mitsubishi has issued to dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, and other documents and communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Mitsubishi is planning to issue within the next 120 days.

A.7. Copies of the following applicable documents are provided in this mailing:

- ◆ SR-01-008REVII
- ◆ SR-01-008REV
- ◆ SR-01-008
- ◆ ATIN-01-SR-010

Q.8 through Q.10. - MMNA will provide these responses on or before August 24, 2006.

Q.11. Produce one of each of the following:

- a. Exemplar sample of each design version of the subject component
- b. Field return sample of the subject component exhibiting the subject failure mode
- c. Any kits that have been released, or developed by, Mitsubishi for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

A.11. Even though there are four different part numbers for the accumulator, there are in fact only two designs. The first part number MR527718 was the original part number and was established in our system on 28 January 2000. The second part number MR977411 was established in our system on 18 May 2001 and was the same as the first part number, however an O-ring was included, making it a kit. The third part number MR977223 was a design change to the diaphragm and was developed for the recall. The fourth part number 4630A011 is the same physical design as MR977223; however the warning label attached to the accumulator was changed to include the Arabic language along with the other languages already on the label. A cross-sectional drawing showing the differences in design between the old and the countermeasure parts will be provided in our response to Q.10, which will be provided on or before August 24, 2006.

- a. Part numbers MR527718, MR977411 and MR977223 are no longer available as they have all been superseded by part number 4630A001. A sample of that design is being sent under separate cover.
- b. A failed part number MR527718 is also being sent under separate cover. This part was returned from the field and was originally installed on one of the subject vehicles.
- c. See A.11 above.

Q.12. State the number of each of the following that Mitsubishi has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

- a. Subject components; and
- b. Kits that have been released, or developed, by Mitsubishi for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Mitsubishi is aware of that contain the identical component, whether in production or in service, and the applicable dates of production or service usage.

A.12. The attachment named "Parts Demand" includes the monthly demand for each of the four part numbers identified in A.11 above. The numbers reflect the part that the dealer ordered on his order form, however if a part number is superseded, the newer part is actually the component shipped. Mitsubishi is not able to identify which model or model year the parts sales were for; however only the 2000 and 2001 Mitsubishi Montero equipped with HBB ABS used the subject components.

The Vendor for the subject components is:

Accumulator (original and modified part)

Supplier's name: AISIN SEIKI Co. Ltd.

**Address: 2-1, Asahi-machi, Kariya, Aichi Prefecture
JAPAN 448-8650**

The appropriate contact person will be provided as a portion of our confidential submission, due to the personal information on this individual.

Q.13. MMNA will provide this response on or before August 24, 2006.

Q.14. MMNA will provide this response on or before August 24, 2006.