

NISSAN

NISSAN NORTH AMERICA, INC.

Corporate Office
P.O. Box 685001
Franklin, TN 37068-5001
Telephone: 615.725.1000

July 28, 2006

Mr. Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defect Investigation
National Highway Traffic Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590

Re: NVS-212-pco
EA06-001PIR

Dear Mr. Cooper:

Enclosed is Nissan's response to the referenced NHTSA Information Request of May 16, 2006 concerning the Agency's comparative assessment related to its investigation of alleged shattering of the sunroof glass panel resulting in injuries from falling glass fragments in certain model year 2004 - 2006 Cadillac SRX vehicles manufactured by the General Motors Corporation.

The attached reply responds by first stating each question, then the response. Please contact us if you have any questions.

Sincerely,



Frank D. Slaveter
Senior Manager
Technical Compliance

Enclosures

RECEIVED
JUL 31 11 43 AM '06

RECEIVED
JUL 31 11 43 AM '06

RECEIVED
JUL 31 11 43 AM '06

Response to
EA06-001PIR

OFFICE OF THE ATTORNEY GENERAL
MAY 21 10 03 AM '06

INTRODUCTION

In accordance with discussions with the Agency's Thomas Cooper, an extension of time was granted until July 28, 2006 to respond to this Information Request ("IR"). Additionally, the model year and model definition of "subject peer vehicles" was changed to eliminate the 2004 Maxima. Nissan appreciates the Agency's courtesy in this regard. Also, the optional power sunroof on the 2005 through 2006 Maxima vehicles does not meet the square meter requirement for a "panoramic sunroof system" and NHTSA agreed that it is outside the scope of this IR.

In responding to this Information Request ("IR"), information has been obtained from those places within Nissan likely to contain such information in the regular and ordinary course of business. When a particular Request seeks "documents" as defined in the IR, reasonable, good faith searches have also been made of corporate records in those places likely to maintain them in the regular and ordinary course of business.

The definitions of "documents" and "Nissan", however, are unreasonably broad, vague and ambiguous in the context of the information sought by this IR. For example, "calendars," "appointment books," "financial statements" and "personnel records" would not contain owner complaints, field reports or other information sought by Question 2 pertaining to the alleged defect. Therefore, searches were not made for such "documents," inasmuch as they would not likely contain responsive information. In addition, Nissan has not provided information from persons or entities over which it does not ordinarily exercise control. Nissan understands this IR to seek information on vehicles manufactured for sale in the United States.

Responses are provided after each question, and Attachments are utilized as appropriate. The source of information used as a basis for the data in each Attachment, including the date the data were updated and retrieved, is identified at the beginning of each Attachment, as applicable. If a document itself is the source for the requested information and it is provided, we assume no further source identification is called for. If a document, drawing or component is requested, or if no responsive information is available, we assume no further source identification is called for.

With regard to claims of privilege, Nissan understands that it is acceptable to the Agency for Nissan to identify specific categories of privileged documents rather than any specific document. These specific categories are: 1) communications between outside counsel and Nissan Legal Department employees, other Nissan employees, or other Nissan-represented parties in litigation and claims; 2) communications between Nissan Legal Department employees and other Nissan employees or other Nissan-represented parties in litigation or claims; 3) notes and other work product of outside counsel or of Nissan Legal Department employees concerning communications with Nissan employees or consultants, and the work product of those employees or consultants done for or at the request of outside counsel or Legal Department employees; and 4) other categories to be identified later as necessary. For any privileged documents that are not included in these categories, such documents, if any, will be specifically identified on a separate privilege index at a later time. To the extent that a document is furnished, Nissan is not asserting a privilege claim for that document, although the disclosure of such document does not waive the attorney-client privilege or work-product protection with respect to other documents prepared in connection

with the specific litigation or claim or other litigation or claims. In addition, in submitting such documents, we reserve our right to claim the attorney-client privilege and/or work-product protection with respect to analyses that may be prepared subsequently in connection with these and other cases. Also, we understand documents specifically related to the preparation of the responses are not sought.

Nissan believes NHTSA's policy is to protect the privacy of individuals under exemption 6 of the Freedom of Information Act, 5 U.S.C. Section 552(b)(6). We understand that name, address, and other personal information of owners or other individuals, including Nissan personnel, contained in any of the attachments in this response will not be made available to the public. Therefore, Nissan is not requesting confidential treatment for this information pursuant to 49 CFR, Part 512, but we believe any private information concerning individuals should not be made public.

* * * * *

1. State, by model, model year and each sunroof configuration, the number of subject peer vehicles Nissan has manufactured for sale or lease in the United States.

Provide the table in Microsoft Excel 2000, or a compatible format, entitled "PRODUCTION DATA."

The number of the subject peer vehicles manufactured for sale or lease in the United States is provided on a CD in a file entitled "Production Data" enclosed as Attachment A.

2. State the number of each of the following (in a table format) by each model, model year, sunroof configuration and the specific sunroof section or panel, received by Nissan, or of which Nissan is otherwise aware, which relate to, or may relate to, the subject condition in the subject peer 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 (including own vehicle); and
 - e. Third-party arbitration proceedings where Nissan is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Nissan is or was a defendant or codefendant.

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 consumer complaint, field report (duplicate) and a crash report (duplicate)), but the duplicated reports shall be identified.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "MANUFACTURER REPORT COUNT."

The information responsive to 2a is provided on a CD in a file titled "Manufacturer Report Count". The CD is enclosed as Attachment A. No field reports, reports involving a crash, injury, or fatality, property damage claims, injuries, third-party arbitration proceedings or lawsuits have been received.

3. State, by each model, model year, sunroof configuration and the specific sunroof section or panel, the total count for all of the following categories of claims, collectively, that have been paid by Nissan to date that relate to, or may relate to, the subject condition in the subject peer vehicles: warranty claims; extended warranty claims; claims for good will 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. Do not count the claim if it is a duplicate of a subpart report in question 2.

Provide this information in a table format in Microsoft Excel or Access 2000, or a compatible format, entitled "WARRANTY DATA."

The main purpose of the warranty system is to reimburse dealers for performing warranty repairs. Claims are submitted by dealers through an on-line computer system through the use of a set of codes. The codes are designed to allow flexibility for their use and, as such, do not supply a significant amount of information about why a particular repair was made, or specific details about the nature of the repair itself.

Within the limitations of our warranty system as it relates to the subject matter of this inquiry, the information responsive to paid warranty claims as described in Request No. 3 is listed in a file titled "Warranty Data" on a CD which is enclosed as Attachment A.

4. Describe in detail the search criteria used by Nissan to identify the claims identified in response to Request No. 3, including the labor operations, problem codes, part numbers 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Nissan on the overall subject vehicle, on glass breakage in the side windows and glass breakage in the sunroof system (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 Nissan offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

The search criteria used by Nissan to identify the claims identified in response to Request No. 3 are outlined in Attachment B. Glass breakage, if resulting from defects in material or workmanship, is covered by the New Vehicle Limited Warranty for 36 months or 36,000 miles, whichever comes first.

5. For each glass panel utilized (from front to rear of vehicle) in the subject vehicle, provide the following information:

- a. Formal item name;
- b. Common item name;
- c. Movable or Fixed glass panel system;
- d. Single or multiple panel design (state no. of panels);

- e. Type of movable glass panel deployment design (i.e., Slide-in-Roof; Tilted and Slide over roof; Tilted, Slide and Stacked (for sectioned design), etc.);
- f. Interior opening beneath glass panel area (length x width across roof in centimeters);
- g. Location of glass panel (i.e., "over 1st -row occupants", "over 2nd -row occupants", "over 1st & 2nd -row occupants," etc...);
- h. Size of panel (length x width centimeters);
- i. Thickness of glass (millimeters);
- j. Weight of glass panel (kilograms);
- k. Type of glass used (i.e. laminated, tempered, tempered-laminated, multiple glazed unit, rigid plastics, etc...as classified in ANSI/SAE Z26.1)
- l. Certified to ANSI/SAE Z26.1, Item ¾ Glazing Material Standard (specify all applicable Table 1 Tests);
- m. Provide any impact test results per ANSI/SAE Z26.1 Test No. 6-14 or per other standards if available;
- n. ANSI/SAE Z26.1 certification marking (i.e. AS1, AS2 Etc.) if any; and
- o. Explain the reasons for selecting the type, thickness, and other relevant aspects of the glass used in the subject component in comparison with other types, thicknesses, and other relevant aspects of glass, which were considered or which could have been used.

The information requested in item 5 is provided in Attachment C.

6. Provide photographs showing an exterior top view looking down at the vehicle's entire roof section. If the glass panel opens, provide photographs for both the close position and the open position. In addition, show wide-angled interior views looking up at the entire roof liner, with all shades opened, with the glass roof panels in the close position and in the open position. Provide a minimum of two pictures each originating from two opposite angles for each exterior and interior screen shots. The files shall be in a "JPG" format with a minimum resolution of 2, 500 x 2,000 pixels each and 2.0 MB size.

The photographs are contained on a CD in a file titled "EA06001PIRpictures". The CD is enclosed as Attachment A.

7. For each model, model year and glass panel design on the subject peer vehicles, identify the part number, supplier name and a complete street address, contact name, and telephone number.

The information in response to item 7 is provided in Attachment D.

ATTACHMENT A

CD with information Responsive to Items 1,2,3, and 6

Vehicle sales information was gathered on June 19, 2006 from a vehicle sales database which is updated daily.

Information was obtained from the Consumer Affairs database, the Tech Line Database, and the field reports database as of July 20, 2006. Legal Department database was searched on June 8, 2006. The databases are updated daily.

Warranty claims data were gathered from Warranty database as of July 20, 2006. The database is updated daily.

The CD in this attachment contains the following files:

- "Production Data" pertaining to Request No. 1;
- "Manufacturer Report Count" pertaining to Request No. 2;
- "Warranty Data" pertaining to Request No. 3; and
- "EA06001PIRpictures" pertaining to Request No. 6.

ATTACHMENT B

Warranty Search Criteria for Request No. 4

The search criteria used by Nissan to identify the claims identified in response to Request No. 3 is as follows:

PNC Code

79715 = SKY ROOF GLASS ASSY

CS Code

UG = FRONT AND REAR WINDOW GLASSES

Word Search in Comments

The following keywords were searched to identify claims in which the vehicle sunroof or Skyview roof shattered: "BREAK", "BROKE", "SUNROOF", "SKYVIEW", "SHATTER."

Descriptions of information in WARRANTY DATA response to Request No. 3 are as follows:

Labor Op Codes

UG26AA = RPL ONE SKY ROOF GLASS ASSY

UG27AA = RPL BOTH SKY ROOF GLASS ASSY'S

ATTACHMENT C

Roof Glass Panel Information Responsive to Item 5

		Maxima - (2005 - 2006)	Quest (2004 - 2006)
Item #5	Formal Item Name	GLASS ASSY BACK WDW	LID ASSY-SUNROOF, RR
	Common Item Name	Sky view	Sky View
	Movable/Fixed Glass	Fixed glass	Fixed Glass
	Single/Multiple Panel	Single glass	Multiple (2 Panels)
	Type of Movable Glass Panel	(N/A)	(N/A)
	Interior Opening Size (cm)	2 openings - FR: 34.6 x 28 & RR: 57.8 x 28 cm	Front RH/LH: 54.29 x 25.86 & Rear RH/LH: 39.51 x 25.86 cm
	Location of Glass Panel	Along the centerline of the roof (1st & 2nd row occupants)	Over 2nd & 3rd row Occupants (See Fig. 3)
	Size of Glass Panel (cm)	113.8 x 31.6 cm	111.64 x 31.19 cm (Per Panel)
	Thickness of Glass (mm)	4mm	4.0 mm
	Weight of Glass Panel (kg)	3.70 kg	3.328 kg (Per Panel)
	Type of Glass Used	Gray Privacy Tinted Tempered Float Safety Glass	Dark Privacy Tinted Tempered Float Safety Glass
	Certified to ANSI/SAE Z26.1, Item 3/4 ?	Certification requirements passed	Certification requirements Passed
	Impact test results per ANSI/SAE Z26.1 Test No.6-14?	Passed all test requirements	Passed all test requirements
	Selection of glass	Selection based upon the best combination of relevant aspects that meet design specifications.	Selection based upon the best combination of relevant aspects that meet design specifications.
ANSI/SAE Z26.1 Certification Marking	AS3 - Non view areas. Tempered laminated glass. Less than 70% light transmittance. DOT-467, M078	DOT-376, AS3, M-2L4	

ATTACHMENT D

Roof Glass Panel Information Responsive to Item 7

		Maxima - (2005 - 2006)	Quest (2004 - 2006)
Item #7	Part Number	79700 7Y005	91216/7 5Z015
	Supplier Name	CARLEX GLASS COMPANY	AGC Automotive Americas Co.
	Complete Street Adress	77 Excellence Way, Vonore, TN, 37885	28850 Cabot Drive Suite 110 Novi, MI 48377
	Contact Name	Chuck Doerr	Alberto Hernandez
	Telephone	(423) 884-1061	248-324-5072



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Memorandum

Subject: EA06-001 Cadillac SRX Sunroof Investigation Date: Aug 29, 2006

From: Peter C. Ong Reply to
Office of Defects Investigation Attn of:

To: EA06-001 File

Nissan North America submitted the following attached document on August 28, 2006 to question 2 of the peer information request. Please add this Nissan submission to the Nissan IR response.

If you have any questions, please contact Peter Ong on 60583.

Peter C. Ong
Office of Defects Investigation
NVS-212



Ong, Peter <NHTSA>

From: Swindell, Wilbert [Wilbert.Swindell@Nissan-Usa.com]
Sent: Monday, August 28, 2006 5:24 PM
To: Ong, Peter <NHTSA>
Cc: Neff, Donald
Subject: Information Request Follow-up Information - EA06-001PIR
Attachments: MANUFACTURER REPORT COUNT_Rev 2.zip

**Re: NVS-212-pco
EA06-001PIR**

Hi Peter,

Per your request, attached is a breakdown of the consumer complaints by model and model year for the investigation of alleged shattering of the sunroof glass panel in certain model year 2004-2006 Cadillac SRX vehicles.

If you require any additional information, feel free to contact me at (615) 725-5527.

Warm Regards,
Will

Will Swindell
Nissan North America, Inc.
Sr. Engineer - Tech Compliance
Tel. 615.725.5527
Fax. 615.725.8506
Wilbert.Swindell@nissan-usa.com

8/29/2006

	# Reported
Consumer Complaints:	
2004 Quest	3
2005 Quest	1
2005 Maxima	2
Total Complaints	6
Field Reports	0
Crashes or Fatalities	0
Property Damage Claims	0
Third-party Arbitration	0
Lawsuits	0