

Mazda North American Operations



Mr. Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigations
Room 5326
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

March 13, 2007

Re: EA06-010, NVS-213swmc

Dear Mr. Quandt:

Enclosed is Mazda's final response to the inquiries included in a letter of December 20, 2006 from Ms. DeMeter regarding comparative data on plastic fuel tanks for 2004 – 2006 model year Mazda RX-8's. This final response supersedes the partial response dated February 20, 2007.

As requested in the letter, duplicate copies of the final response and related information are enclosed and are contained on the two enclosed CD-ROMs except the response to the Request 7 d and e which are being submitted separately to Chief Counsel under the Part512 Confidential Business Information petition.

If you have any questions regarding the enclosed final response, please let me know. My telephone number is (313) 594-7778 and my e-mail address is drobotson@mazdausa.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Robertson', written over a white background.

David Robertson, Group Manager
Environmental, Safety and Powertrain
Engineering

Encl: Two CD-R titled EA06-010, Mazda Final Response, 3/13/07

Mazda's response: NHTSA Inquiry NVS-213swmc, EA06-010

Request 1

State, by model and model year, the number of subject peer vehicles Mazda has manufactured for sale or lease in the United States. Separately, for each subject peer vehicle manufactured to date by Mazda, 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. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease); and
- h. Whether there was any shielding used on the fuel tank assembly.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table, which provides further details regarding this submission.

Answer 1

Mazda records indicate that the approximate total number of subject peer Mazda RX-8 vehicles sold in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, US Minor Outlying Islands, and Virgin Islands) is 61,356.

The number of subject peer Mazda RX-8 vehicles sold in the United States by model and model year is shown below:

Model	2004 MY	2005 MY	2006 MY	Total
Mazda RX-8	37,260	17,703	6,393	61,356

The requested data for each subject peer vehicle is provided electronically in Appendix 1 (filename: PRODUCTION DATA (EA06-010).mdb) on the enclosed CD.

2004 – 2006 Model Year Mazda RX-8 has a heat shield on fuel tank in the area of exhaust pipes.

Request 2

State the number of each of the following, received by Mazda, or of which Mazda 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 peer vehicle, property damage claims, consumer complaints, or field reports;
- d. Reports involving a fire, 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 peer vehicle, property damage claims, consumer complaints, or field reports;

- e. Property damage claims;
- f. Third-party arbitration proceedings where Mazda is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Mazda is or was a defendant or codefendant.

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

Answer 2

Consumer complaints:

There were no records identified in a search of Mazda's Customer Assistance Center (CAC) files maintained by the Technical Service Department (TSD) in Mazda North America Operations (MNAO), which relate to or may relate to the subject condition.

Field Reports:

Records identified in a search of Mazda's Technical Hotline (HL) files maintained by the TSD in MNAO that relate or may relate to the subject condition are provided electronically in Appendix 2 (filename: 2007-3-14 Appendix2.doc) on the enclosed CD.

No records were identified in Mazda's Product Quality Information (PQI) files maintained by the TSD.

Reports involving a crash, injury, fatality and fire

There were no records identified through the search of CAC, HL and PQI files.

Property Damage Claims, Third-party arbitration and Lawsuits

There were no records identified in a search of Mazda's legal files maintained by the Office of Counsel and Customer Mediation in MNAO, and the Office of Legal Affairs of Mazda that relate or may relate to the subject condition.

Request 3

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Mazda's file number or other identifier used;
- b. The category of the 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's VIN;
- e. Vehicle's 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 a vehicle fire is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer 3

The requested information, to the extent it is available, for the field reports in response to request 2 is provided in Appendix 3 (filename: REQUEST NUMBER TWO DATA (EA06-010).mdb) on the enclosed CD.

Request 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 Mazda used for organizing the documents.

Answer 4

Information responsive to this information request related the field reports in the NNS (*) database at MNAO and additional information from dealer identified in response to request 2 is provided electronically in the folders named Appendix 4 (filename: 2007-3-14 Appendix 4.xls) on the enclosed CD.

(*) NNS: New National System is a database system maintained by MNAO. It is core information system and supports various customer service activities such as customer relation, repair inquiry, warranty claim submission and the others.

Request 5

State, by make, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Mazda 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.

Separately, for each such claim, state the following information:

- a. Mazda's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. Vehicle owner or fleet mailing address;
- d. Vehicle Make;
- e. Vehicle Model;
- f. Vehicle Model Year;
- g. VIN;
- h. Repair date;
- i. Vehicle mileage at time of repair;
- j. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- k. Labor operation number;
- l. Problem code;

- m. Replacement part number(s) and description(s);
- n. Concern stated by customer; and
- o. Complaint, cause, correction and comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer 5

There were no records identified during a search of Mazda's warranty records that relate or may relate to the subject condition.

Request 6.

Describe in detail the search criteria used by Mazda to identify the claims identified in response to Request No. 5, 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 Mazda on the subject peer 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 Mazda 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.

Answer 6

Information provided in response to this information request is provided electronically in Appendix 6a (filename: 2007-3-14 Appendix6a.doc) on the enclosed CD.

For 2004 through 2006 model year RX-8 vehicles, Mazda provided warranty coverage of four years or 50,000 miles, whichever occurs first.

The information in response to the request of extended warranty coverage option(s) is provided electronically in Appendix 6b (filename: 2007-3-14 Appendix 6b.xls) on the enclosed CD.

Request 7

Provide the following information concerning the subject peer vehicles fuel tank assemblies (information previously supplied in response to PE05-050 need not be duplicated):

- a. Drawings showing the design ground clearance of the subject peer fuel tank assembly;
- b. Identify all subject peer vehicle components that have lower ground clearances than the subject peer fuel tanks and the state the location and ground clearance for each;
- c. Provide a bottom view drawing or picture showing the undercarriage of the subject peer vehicle in the fully built configuration with the fuel tank and the locations of all components identified in "8.b";
- d. Copies of all engineering specifications relating to the packaging, shielding, ground clearance, and/or puncture resistance of the subject peer fuel tanks;
- e. Copies of all engineering standards, design guides or similar documents that relate in any way to the packaging, shielding, ground clearance and/or puncture resistance of fuel tanks in passenger cars or light trucks;
- f. State what material the subject peer fuel tank is composed of (e.g., HDPE plastic); and
- g. State the supplier and/or maker of the subject peer fuel tank assemblies.

Answer 7

a.

The drawing which relevant 7a is provided electronically in Appendix 7a (filename: 2007-3-14 Appendix 7a.xls) on the enclosed CD.

b. and c.

The list of components that have lower ground clearances than the subject peer fuel tanks and the bottom view drawing which relevant 7b and 7c are provided electronically in Appendix 7b/7c (filename: 2007-3-14 Appendix 7bc.xls) on the enclosed CD.

d. and e.

A document relevant to Request 7d and 7e will be submitted under separate cover with a request for confidentiality to the agency's Office of General Counsel. This document is a test procedure about vehicle ground clearance, and referenced as Appendix 7d/7e (filename: 2007-3-14 Appendix 7de.pdf).

f.

The fuel tank is composed of HDPE plastic.

g.

The supplier of the fuel tank assembly is Kautex Japan.