



May 29, 2009

Mr. Peter Ong
Office of Defects Investigation
NHTSA NVS-212, W45-204
1200 New Jersey Ave. S.E.
Washington, DC 20590

RE: NVS-212cag, EA08-011

Dear Mr. Ong:

Mitsubishi respectfully submits the following/attached information in response to your request for supplemental information on Engineering Analysis EA08-011. Mitsubishi would also like to take this opportunity to summarize and reiterate its position regarding the issues under inquiry in EA08-011 related to the MY 2001 -2003 Galants.

After extensive internal analyses by Mitsubishi and its supplier (all of which has been provided to NHTSA in previous submissions or in today's submission), no defect has been identified in the design or manufacture of the passenger side power window door switch or other electrical component. The same (or substantially similar) switch was used in many other makes/models of Mitsubishi vehicles for the front passenger and rear passenger doors. Taking into account both two and four door models, this same (or substantially similar) switch was used in almost 1,000,000 vehicles and on more than 2,000,000 doors. Moreover, the design, materials and structure of this switch are common in the industry, and have no unique features. Mitsubishi also points out that, while there is no applicable regulation for resistance to fluid contamination, Mitsubishi has an internal standard for rain water resistance. The design of this switch met and exceeded that internal standard.

No defect has ever been identified that would cause the reports of smoke and fire in the vicinity of the passenger side door. In addition, the reports which have been received do not support a conclusion that these events present an unreasonable risk to motor vehicle safety. The property damage in most of these events was modest and rarely involved components beyond thermal damage to the door panel. In addition, only three of the reports alleged any injury associated with the smoke/fire event:

1. Kolar: Report alleges a burn to the hand when the vehicle owner and a neighbor tried to remove the door panel, and a burn to the leg of a vehicle occupant.
2. Smith: Report alleges a sprained ankle, a burn on the right leg and a back spasm. Smith later alleges emotional distress.
3. Zuniga: Report alleges non-burn injury (right arm "tingle").

There are no reports involving loss of vehicle control, or impairment to other vehicle safety systems. We also note that there is a declining trend in the reports of fires or related events in the subject vehicles. Only two reports have been received in 2009 to date, and only seven reports were received in all of 2008. In addition, more than 70% of all the reports were made on or before the end of November 2006 – over 30 months ago.

In summary, Mitsubishi does not believe a defect presenting an unreasonable risk to motor vehicle safety has been established in these vehicles. Accordingly, Mitsubishi respectfully requests NHTSA close this investigation.

Sincerely,

Tom Bennett
MMNA Director, Service
Phone: 714-372-5554
Email: tbennett@mmsa.com



1. **QUESTION:** 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 and not previously supplied in Mitsubishi's November 6, 2008, submission:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Police and Fire Department reports;
 - d. 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;
 - e. 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 vehicle, property damage claims, consumer complaints, or field reports;
 - f. Property damage claims;
 - g. Third-party arbitration proceedings where Mitsubishi is or was a party to the arbitration; and
 - h. Lawsuits, both pending and closed, in which Mitsubishi is or was a defendant or codefendant.

For subparts "a" through "f," state the total number of each item (e.g., consumer complaints, field reports, police 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 "h," 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 "d" through "h," 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.

1. **ANSWER:** Listed below are additional reports for subject vehicles for the alleged defect received or identified since our response to EA08-011 on November 6, 2008.

Type	2001 Galant	2002 Galant	2003 Galant
Item a. Consumer Complaints	0	1	2
Item b. Field Reports	0	0	0
Item c. Police & Fire Dept. reports	0	0	0
Item d. Reports involving a crash/injury/fatality	0	0	0
Item e. Reports involving fire	0	1	2
Item f. Property damage claims	0	0	0
Item g. Third-party arbitration	0	0	0
Item h. Lawsuits	0	0	0

2. **QUESTION:** Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:
 - a. Mitsubishi's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 1 (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 date of manufacture;
 - g. Vehicle's mileage at time of incident;
 - h. Incident date;
 - i. Whether the incident occurred to the passenger side or driver side of the vehicle;

- j. Report or claim date;
- k. Whether a crash is alleged;
- l. Whether a fire is alleged;
- m. Whether liquid intrusion is alleged;
- n. Whether property damage is alleged;
- o. Whether the vehicle was being driven or was parked at the time of the incident;
- p. Number of alleged injuries, if any;
- q. Type and/or location of the injury (i.e. cuts/abrasions to the arms, legs, etc.), if any; and
- r. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "NEW COMPLAINTS DATA."

- 2. **ANSWER: The Excel spreadsheet named "NEW COMPLAINTS DATA.XLS" provided with this response contains the above information.**
- 3. QUESTION: 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.
- 3. **ANSWER: Copies of documents within the scope of Question 2 are provided in this response. These documents are organized by category, then by date of report.**
- 4. QUESTION: State, by model and model year, a 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, and not previously supplied in Mitsubishi's November 6, 2008 submission: 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. Mitsubishi's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. Vehicle's VIN;
- d. Vehicle's make, model and model year;
- e. Vehicle date of manufacturer;
- f. Repair date;
- g. Vehicle mileage at time of repair;
- h. Whether the incident occurred to the passenger side or driver side of the vehicle;
- i. Report or claim date;
- j. Whether a crash is alleged;
- k. Whether a fire is alleged;
- l. Whether liquid intrusion is alleged;
- m. Whether property damage is alleged;
- n. Whether the vehicle was being driven or was parked at the time of the incident;
- o. Number of alleged injuries, if any;
- p. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- q. Labor operation number;
- r. Problem code;
- s. Replacement part number(s) and description(s);
- t. Concern stated by customer;
- u. Indication of an impending failure, if any;
- v. Whether Mitsubishi re-purchased the vehicle; and,

w. Comment, if any, by dealer/technician relating to claim and/or repair.

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

4. ANSWER: The Excel spreadsheet named "NEW WARRANTY DATA.XLS" provided with this response contains the above information.

5. QUESTION: Describe in detail the search criteria used by Mitsubishi to identify the claims identified in response to Request No. 4, 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 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.

5. ANSWER

▪ Labor operations

LABOP OP#	LABOR OP DESCRIPTION
424111	FRONT DOOR PANEL
428101	FRONT DOOR POWER WINDOW MOTOR
428201	POWER WINDOW SWITCH - MAIN
428202	POWER WINDOW SWITCH - SUB
428401	POWER WINDOW RELAY
524260	FRONT DOOR TRIM ASSEMBLY
545031	FRONT DOOR SPEAKER
545033	DOOR SPEAKER
545041	FRONT DOOR TWEETER SPEAKER

▪ Part numbers on repair order

Side	PART NO.	DESCRIPTION
DRIVERS	MR394077	Harness, Front Door LH
DRIVERS	MR394078	Harness, Front Door LH
DRIVERS	MR973572	Harness, Front Door LH
DRIVERS	MR400711	Switch Assembly, Front Door Power Window LH
DRIVERS	MR400712	Switch Assembly, Front Door Power Window LH
DRIVERS	MR537990	Time & Alarm Control Unit (ETACS)
DRIVERS	MR537993	Time & Alarm Control Unit (ETACS)
DRIVERS	MR122409	Relay, Power Window
DRIVERS	MR349769	Latch, Front Door LH
DRIVERS	MR532238	Trim, Front Door LH
Side	PART NO.	DESCRIPTION
PASSENGER	MR973577	Harness, Front Door RH
PASSENGER	MR394066	Harness, Front Door RH
PASSENGER	MR394065	Harness, Front Door RH
PASSENGER	MR973578	Harness, Front Door RH
PASSENGER	MR400713	Switch Assembly, Front Door Power Window RH
PASSENGER	MR970920	Front Door Latch (Power) RH
PASSENGER	MR349772	Latch, Front Door RH
PASSENGER	MR532240	Trim, Front Door RH

- **Problem Codes – The problem codes and problem code descriptions applicable to the alleged defect in the subject vehicles are listed in the charts contained in the Excel spreadsheet named “Warranty Problem Codes.xls” provided with this response.**
- **Warranty Coverage – The warranty terms for the subject vehicles are described in the Excel spreadsheet named “Warranty Coverage.xls” provided with this response.**

6. **QUESTION:** Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, Mitsubishi has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities, that were not provided in Mitsubishi’s November 6, 2008, submissions. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or 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.
6. **ANSWER:** No documents have been issued that relate to, or may relate to, the alleged defect in the subject vehicles. Mitsubishi does not plan to issue any communication on this subject within the next 120 days.
7. **QUESTION:** State the number of each of the following that Mitsubishi has sold that may be used in the subject vehicles that were not provided in Mitsubishi’s November 6, 2008, submission. State each of the following 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:
- a. Front passenger door panel;
 - b. Front passenger power window switch;
 - c. Front passenger power door lock;
 - d. Front driver side door panel;
 - e. Front driver side power window switch;
 - f. Front driver side power door lock;
 - g. Wiring, devices, connectors, controls and associated fuses for each of the window switches and door locks described above; and,
 - h. Any 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).

7. **ANSWER:** The Excel spreadsheet file named “Parts Demand.xls” provided in this mailing contains the sales demand on the subject parts. The parts listed in the file apply to the subject vehicles as well as other Mitsubishi models (i.e., Endeavor, Eclipse, Eclipse Spyder), and many of these parts are used over several model years of the subject vehicles. We have no method to determine which vehicle or model year received the parts when they were sold.

Supplier information of these parts:

Part No.	Part Description	Supplier Name	Address (Sales office)	Phone Number	Point of Contact
MR973577 MR394066 MR394065 MR973578 MR394077 MR394078 MR973572	Door Harness	Yazaki North America, Inc.	2002 Eagle Road, Normal, IL 61761	(309) 452-8100	Mr. Nick Howard
MR400711 MR400712 MR400713 MR537990 MR537993 MR122409	Power Window Switch Control Unit Control Unit Relay	Omron Automotive Electronics Inc.	29185 Cabot Dr. Novi, MI 48377	(248) 893-0200	Mr. Ivan Martinez
MR970920 MR349769	Power Door Latch	Ansei America Inc.	1659 No. Grundy Quarles Highway, Gainesboro, TN 38562	(931) 268-6080	Mr. Nobu Uemura

8. **QUESTION:** State the number of similar or substantially similar vehicles Mitsubishi has sold that use the subject component that were not provided in Mitsubishi's November 6, 2008, submission. For each similar or substantially similar vehicle for which Mitsubishi has received a complaint, field report, etc. that relates or may relate to the alleged defect, identify:
- The category of the item (i.e. consumer complaint, field report, etc.);
 - Vehicle's VIN;
 - Vehicle's date of manufacture;
 - Vehicle's make, model and model year;
 - Mileage at time of incident;
 - Date of incident;
 - Whether the incident occurred to the passenger side or driver side of the vehicle;
 - Report or claim date;
 - Whether a crash is alleged;
 - Whether a fire is alleged;
 - Whether liquid intrusion is alleged;
 - Whether property damage is alleged;
 - Whether the vehicle was being driven or was parked at the time of the incident;
 - Number of alleged injuries, if any;
 - Type and/or location of the injury (i.e. cuts/abrasions to the arms, legs, etc.), if any;
 - Number of alleged fatalities, if any;
 - The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease); and,
 - Total production volume of the similar or substantially similar vehicle.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "NEW PEER VEHICLES."

8. **ANSWER:** The number of vehicles that use the subject component are listed in the table below.

Vehicle Model	Model Year	Vehicle Production
Galant	1999	62,910
Galant	2000	95,135
Galant	2004	42,489
Galant	2005	28,815
Galant	2006	27,862
Eclipse	2000	66,523
Eclipse	2001	53,036
Eclipse	2002	31,306
Eclipse	2003	67,438
Eclipse	2004	10,997
Eclipse	2005	4,641
Eclipse Spyder	2001	26,113
Eclipse Spyder	2002	9,999
Eclipse Spyder	2003	24,617
Eclipse Spyder	2004	6,347
Eclipse Spyder	2005	3,835
Endeavor	2004	56,111
Endeavor	2005	20,891
Endeavor	2006	15,566

The Excel spreadsheet named "NEW PEER VEHICLES.XLS" provided with this response contains the above requested information.