

# INFORMATION Redacted PURSUANT TO THE FREEDOM OF

Mazda North American Operations  
INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)



**mazda**

Mr. Jeffrey L. Quandt, Chief  
Vehicle Control Division  
Office of Defects Investigation  
Room W48-223  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

July 2, 2009

Dear Mr. Quandt:

Re: RQ09-002:NVS-213kmb

Enclosed is Mazda's response to the inquiries included in a letter of May 15, 2009, regarding allegations of post-recall engine compartment fires in certain 2001 – 2004 model year Mazda Tribute vehicles. As requested, duplicate copies of responses and related information are enclosed and are contained on the two enclosed CD-ROMs.

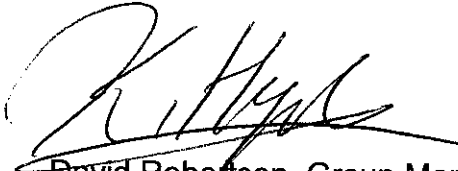
In the attached response, we have focused our investigation on vehicles that had previously completed the recall repair. This change in scope was agreed to with Mr. Kyle Bowker of the agency on June 18, 2009 during our telephone conversation seeking clarification of affected vehicles.

In the response to Request 3 in the inquiries, some of the requested information (e.g. customer's names and addresses, etc.) is left as "NA" because our database system does not contain such information.

For Request 5 in the inquiries, Mazda will not provide any data files because there are no records found from a search of Mazda's warranty records, that relate or may relate to the subject recall. Mazda notes that it is difficult to accurately determine from each warranty claim whether it relates to the alleged defect. Please note that the warranty claims are submitted to Mazda by dealers to seek payment for repairs, which they have made, and often contain insufficient information to accurately determine why a repair was made, if the repair was appropriate, or even if the repair was necessary. In our opinion, the information provided in these warranty claims is insufficient to support a determination if they relate to the alleged defect in the subject vehicles.

If you have any questions regarding our responses or need further information, please contact Keigo Higaki my staff at [khigaki@mazdausa.com](mailto:khigaki@mazdausa.com) or (313) 390-0178, or me at [drobertson@mazdausa.com](mailto:drobertson@mazdausa.com) or (313) 594-7778.

Sincerely,

  
*for* David Robertson, Group Manager  
Environmental, Safety and Powertrain  
Engineering

Encl: Two CD-R titled RQ09-002, Mazda Response, 7/2/09

## Mazda's response: NHTSA Inquiry NVS-213kmb, RQ09-002

### Request 1

State, by model and model year, the number of subject vehicles Mazda has manufactured for sale or lease in the United States. Separately, for each subject 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. Date subject recall repairs completed;
- h. Labor operation for subject recall repairs; and
- i. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

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 that provides further details regarding this submission.

### Answer 1

Mazda records indicate that the approximate total number of 2001 – 2004 Model Year Mazda Tribute vehicles subject to NHTSA recall number 07V-157 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 95,349.

The requested data is provided electronically in Appendix 1 on the enclosed CD.  
(filename: ProductionDataResponse(RQ09-002).mdb)

The following is the explanation of labor operation code(s) for path h.

Description	Labor Operation
Passed inspection: - Pass the inspection of ABS harness connector mat cover - Pass the inspection of connector seal - Apply electrical grease to ABS module connector cavity	J0705A
Seals out of position: - Pass the inspection of ABS harness connector mat cover - Reseat the connector seals - Apply electrical grease to ABS module connector cavity	J0705B
Missing seals or wrong connector mat cover: - Install pigtail connector - Apply electrical grease to ABS module connector cavity	J0705C
Corroded connector pins: - Install pigtail connector - Replace ABS module - Apply electrical grease to ABS module connector cavity	J0705D

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 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 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;
- d. Property damage claims;
- e. Third-party arbitration proceedings where Mazda is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Mazda 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, 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). For items "e" and "f," 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 2Consumer complaints:

Records identified in a search of Mazda's Customer Assistance Center files maintained by the Technical Service Department (TSD) in Mazda North America Operations (MNAO), that relate or may relate to the alleged defect are provided electronically in Appendix 2 (filename: RQ09-002\_Appendix2.doc) on the enclosed CD.

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 alleged defect are provided electronically in Appendix 2. No records were identified in Mazda's Product Quality Information (PQI) files maintained by the TSD.

Property Damage Claims:

Records identified in a search of Mazda's legal files maintained by the Office of Legal Affairs of MNAO that relate or may relate to the alleged defect are provided electronically in Appendix 2.

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. Incident location;

- i. Report or claim date;
- j. Whether a vehicle fire is alleged;
- k. Whether a structure fire is alleged;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any;
- n. Number of alleged fatalities, if any;
- o. Whether Mazda received a subrogation claim regarding the incident( If so, please provide the name of the business and/or person who submitted the claim, their address, and telephone number);
- p. Whether a fire investigation was performed by any party, that Mazda is aware of, to determine the origin and cause (if so, please provide a copy of the report);
- q. Alleged origin of the fire;
- r. Alleged cause of the fire;
- s. Whether the incident occurred with the engine "OFF" or the engine "ON";
- t. Ignition key position at time of incident;
- u. Complaint summary;
- v. Consumer comments; and
- w. Mazda's assessment of the allegation, including causal and contributing factors and a summary of the significant underlying facts and evidence.

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 consumer complaints, field reports, property damage claims and lawsuits in response to request 2 is provided in Appendix 3 on the enclosed CD. (filename: RequestTwoData(RQ09-002).mdb )

In this response, some of the requested information (e.g. customer's names and addresses, etc.) is left as "NA" because our database system does not contain such information.

#### 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 to the consumer complaints and field reports in the NNS (\*) database at MNAO identified in response to request 2 is provided electronically in the folders named Appendix 4 - Consumer Complaints and Appendix 4 - Field Reports on the enclosed CD. Each files are named with the Mazda's file number which is same as path a. of Request2. Information related to the property damage claims is provided in the folder named Appendix 4 – Property Damage Claims.

(\*)NNS: New National System is a database system maintained by Mazda North America Operations (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 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 recall: 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), address 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; and
- h. Comment, 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 are no records found from a search of Mazda's warranty records, that relate or may relate to the subject recall. Therefore, Mazda will not provide any data files for Request5.

Mazda notes that it is difficult to accurately determine from each warranty claim whether it relates to the alleged defect. Please note that the warranty claims are submitted to Mazda by dealers to seek payment for repairs, which they have made, and often contain insufficient information to accurately determine why a repair was made, if the repair was appropriate, or even if the repair was necessary. In our opinion, the information provided in these warranty claims is insufficient to support a determination if they relate to the alleged defect in the subject vehicles.

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 alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Mazda on the repairs associated with the subject recall (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 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 6 (filename: RQ09-002\_Appendix6.doc). For 2001 and 2002 model year Tribute vehicles, Mazda provided warranty coverage of three years or 50,000 miles, whichever occurs first. For 2003 and 2004 model year Tribute vehicles, Mazda provided warranty coverage of four years or 50,000 miles, whichever occurs first. There was no extended warranty coverage offered by Mazda.

Request 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 Mazda has issued to any 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, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Mazda is planning to issue within the next 120 days.

Answer 7

Mazda issued 4 revisions of dealer announcement for the recall 07V-157 on and after its initiation. Copies of relevant documents are provided electronically in Appendix 7 on the enclosed CD.

(1) Dealer Letter for R4507C Original.pdf:

Original dealer notification letter for the recall 4507C(07V-157) at the initiation in April 2007

(2) Dealer Letter for R4507C\_rev2.pdf:

To note a revision of part number of the ABS Module and the service pig tail kit in October 2007. Another existing ABS control module has been introduced as a repair part in order to recover the parts shortage. For service pig tail kit, Ford has newly established another pig tail kit for their demand. Because it can be usable for Mazda vehicles, it has been introduced as a new part.

(3) Dealer Letter for R4507C 2nd Notif.pdf:

To note sending the 2nd owner notification letter in August 2008.

(4) Dealer Letter for R4507C 3rd Notif.pdf:

To note sending the 3rd owner notification letter in May/June 2009.

## \*note

These dealer notification letters include repair procedures A to D for various repair patterns. In order to prevent any misunderstanding, the correspondence between the labor operation code and repair procedure is shown as follows. The labor operation code J0705B corresponds to the repair procedure D. Also, J0705D corresponds to repair procedure B.

Inspection & Repair	Labor Operation	Repair procedure
Passed inspection: - Pass the inspection of ABS harness connector mat cover - Pass the inspection of connector seal - Apply electrical grease to ABS module connector cavity	J0705A	A
Seals out of position: - Pass the inspection of ABS harness connector mat cover - Reseat the connector seals - Apply electrical grease to ABS module connector cavity	J0705B	<u>D</u>
Missing seals or wrong connector mat cover: - Install pigtail connector - Apply electrical grease to ABS module connector cavity	J0705C	C
Corroded connector pins: - Install pigtail connector - Replace ABS module - Apply electrical grease to ABS module connector cavity	J0705D	<u>B</u>

Request 8

Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Mazda. For each such action, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Answer 8

Mazda is trying to have investigation for the incident on vehicle of 4F2YU091X2K [REDACTED], which occurred on May 26, 2009 in Pennsylvania (included in Answer 2, 3, 4). However, because the concerned vehicle is now under the hold of related insurance company, Mazda cannot make any investigation or arrangement of investigation plan.

Request 9

Furnish Mazda's assessment of the alleged defect in the subject vehicles, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses; and
- e. The reports included with this inquiry.

Answer 9

As the agency is aware, Mazda voluntarily initiated a safety recall 4507C (registered by NHTSA as 07V-157) for 2001 through 2004 Model Year Mazda Tribute vehicles equipped with ABS in May, 2007, simultaneously with the safety recall 07S51 (NHTSA number 07V-156) for Ford Escape vehicles conducted by Ford Motor Company, which is a builder of Mazda Tribute vehicles.

Certain electrical wiring harness for ABS control module were manufactured with some components either missing or wire seals were improperly installed around a power supply or ground connection wire terminal on the ABS module connector. If the seal is missing or was improperly installed, over time, contamination (brake fluid spill, road spray, car wash, for examples) may enter the electrical connection. The contamination may cause corrosion of the electrical pins in the connection and may result in an electrical path between the power supply and ground pins. This may result an illuminated ABS warning indicator or in rare cases, the electrical connector may overheat, smoke, or burn.

This field service action is desired to inspect missing or improper wire seal and corrosion on the ABS module connector. Depending on the inspection result, there are 4 types of repair procedure. If there is any sign of corrosion or damage on the connector, the ABS control module is replaced and the wiring harness is repaired with the pig-tail repair kit. If there is no sign of corrosion/damage but any seal issue(s) such as missing seal or wrong mat cover installed are present, the wiring harness is repaired. If the seal issue is only dislodged seal and there is no sign of corrosion, it repaired by



simply fully seating the seal. If there are no issue both of the seal and connector, no repair is needed. For all cases, the dielectric grease is applied to the connector.

Mazda has been continuing to monitor the implementation of the recall action. As described in the Answer8, Mazda tries to investigate the situation of the incident on 4F2YU091X2K [REDACTED] vehicle.

In this response, there are 9 reports for post recall incidents of the alleged defect, and actually 8 incidents by consolidating the duplicate information. On each case, the concerned vehicles are repaired prior to the incident using labor code J0705A, which means that the technician determined there are no wire seal problems or corrosion of the connector. Also, 2 vehicles of VIN 4F2CU08121K [REDACTED] and 4F2YU08122K [REDACTED] from the VOQ information have repaired using labor code J0705A. No incident reports are found from the vehicles repaired using any other labor operation code. Therefore, there are possibilities that the improper inspection has eventually resulted post recall incidents.

Based on this situation and the number of the incidents, the same can be said for Mazda with the RQ09-002 response of Ford which has been submitted on June 19, 2009.

Mazda will continue to monitor the field concern and communicate with Ford to examine the necessity of additional action, including issuing a notification to dealers reemphasizing the importance of proper wire seal inspection procedures.

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