

recvd 3/7/201

**avis budget** group

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Ms. Jennifer Timian  
Chief, Recall Management Division, NVS-215  
US Department of Transportation

National Highway Traffic Safety Administration  
Office of Defects Investigation  
Room W48-302  
1200 New Jersey Avenue SE  
Washington DC 20590

Reference NVS-215jt: AQ10-001

Dear Ms. Timian:

I am writing on behalf of Avis Budget Group, Inc. and all of our hard working employees with regard to the above referenced matter. While we were not specifically asked to provide a response to your inquiry, and moreover, while we were never contacted to verify the data that was provided by General Motors (GM) and Chrysler, in the interest of public safety, we feel compelled to correct the public record regarding the performance of Avis Budget in the referenced matter.

Let me begin by stating that all of us at Avis Budget take the safety of our customers very seriously, and we invest a significant amount of time, effort and financial resources to ensure our customers are driving safe vehicles. Our employees, in particular, strive for excellence; and the data presented by General Motors and Chrysler in response to your audit inquiry does a disservice to their hard work. Most importantly, the reported information conveys grossly inaccurate information to the public that could result in consumers having unwarranted concerns and making misinformed decisions.

The recall data supplied by GM and Chrysler to NHTSA is so inaccurate; the best way to describe it is that the information is just wrong. To start, none of the data regarding the number of vehicles allegedly in the Avis Budget fleet at the launch of any of the reported recall notices are correct; in a few cases the reported number is not even close to being correct.. Both GM and Chrysler relied on data from other sources (RL Polk vehicle registrations) to attribute vehicle ownership at the time of the recall launches. However, due to delays in the way in which many of these sources gather and obtain such information, the actual numbers of vehicles in our fleet were in substantially less than those reported. The change of ownership (according to RL Polk) can be up to 9 – 12 months AFTER we dispose of the vehicle. Next, most of the reported data regarding the

actual number and percentage of vehicles that Avis Budget remedied at each 30-day interval is incorrect. The actual numbers and percentages of remedied vehicles in most categories are higher than reported by GM and Chrysler as set forth more fully below..

For example, with respect to NHTSA Recall 10V073, a Non-Compliance recall, which GM launched in two phases. Avis Budget repaired 100% of the affected vehicles in the first launch within 30 days. In the second phase, the number of affected vehicles in our fleet was almost half the number GM reported in its response to your inquiry; we remedied 90% of the second phase affected vehicles within 60 days, and 97% within 120 days. It should also be noted that the first release from General Motors included incorrect repair information.

When we received notice of NHTSA Recall 10V018, all affected vehicles were immediately grounded and placed in a “hard hold” status (do not rent the vehicle) until parts become available for making the necessary repairs. Notwithstanding the do not rent status, in this specific instance, Avis Budget had completed its repairs within 30 days..

Regarding NHTSA Recall 10V-024, our vehicle maintenance staff learned of the potential danger from floor mats causing accelerator pedals to stick, and proactively reached out to the manufacturer to discuss remediation six months before a recall was ever issued. After being advised by the manufacturer that the danger could be eliminated simply by removing the floor mats, we grounded all of the affected vehicles and removed the floor mats so that the vehicles could remain safe to operate while we waited for parts to effect repairs. By taking these proactive steps quickly, Avis Budget took remedial steps to ensure the safety of our customers several months PRIOR to the issuance of the manufacturer’s recall notice. Once the recall was launched, and 95% of the vehicles affected were remedied within 90 days of the replacement parts being made available by GM.

Another example of inaccurate information reported to you by the manufacturer, concerns NHTSA Recall 08V-152. Some of the data reported involved cars that were no longer in our fleet. The vehicles in our fleet were immediately placed on a hard hold status (do not rent) until the repairs were affected. Again, these repairs were completed in a timely fashion with all repairs to 54% completed within 30 days, 98% within 60 days and 100% within 90 days.

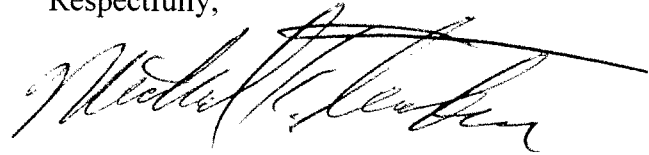
As you will note from several of the examples listed above, we took the step of placing vehicles into a do “not rent status” until the repair was completed or until a suitable remedial measure rendering the vehicle safe based on the manufacturers representations were affected prior to renting the vehicles. This represents another critical fact that was not provided in the response from either GM or Chrysler which has significant implications to our reputation. This fact was omitted from the data call and clearly does not portray the positive steps we at Avis Budget take to ensure customer safety.

When it comes to ensuring public safety, it is very important to react quickly and accurately. This fact is not limited to just the repairs, but is equally true about

information provided to the consumer regarding the efforts of those responsible for keeping them safe and informed. It is critically important that the consumer have accurate information regarding the defects, level of potential danger, and the efforts of product and service providers to eliminate the public threat. Lives may be put at unnecessary and avoidable risk because of inaccurate information affecting consumer choices. With this purpose in mind, we hereby request that NHTSA issue a correction of the erroneous data provided by NHTSA to the public, and that NHTSA post this letter on its website.

Let me take this opportunity to thank you for your time and attention to this matter. Avis Budget stands ready to assist your efforts to accurately inform the public in any way we can. Should you have any questions, please feel free to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael K. Tucker", with a long horizontal flourish extending to the right.

Michael K. Tucker