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1200 New Jersey Avenue SE Washington, DC 20590

Via USPS Certified Mail and E-mail

Mr. Scott L. Thompson President and Chief Executive Officer Dollar Thrifty Automotive Group, Inc. 5330 East 31st Street Tulsa, Oklahoma 74135 NVS-215jt AQ10-001

Re: AQ10-001: Rental Vehicle Audit Query

Dear Mr. Thompson:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an audit query (AQ10-001) of recall completions by rental car companies on 16 safety recalls in recent years. We have written information request letters to General Motors, Ford Motor Company, and Chrysler Group, LLC to gather more information about rental car completion rates and their subsequent responses can be found on our website, www.safercar.gov, by querying AQ10-001.

We are interested in learning what Dollar Thrifty Automotive Group, Inc.'s (Dollar Thrifty) policies and procedures, past and present, are with respect to safety recalls on the vehicles within its fleet. We are also interested in learning how Dollar Thrifty manages and executes the important business of disseminating safety recall information to its rental facilities and verifying that the free remedies offered by manufacturers are applied. To that end, please provide information responsive to the following questions. To the extent there is written documentation that sets out or explains or supports your response, please provide that documentation.

- 1. Does Dollar Thrifty have a policy or procedure on having repairs and other remedies pursuant to U.S. vehicle safety recalls performed on vehicles within its fleet? If so, please describe in detail that policy or procedure and produce a copy of it. To the extent that policy or procedure has changed over the past three (3) years, please identify and explain: (a) what changes were made; (b) why they were made; and (c) when the changes were made.
- 2. Does Dollar Thrifty draw distinctions between safety recalls in terms of severity, size of affected population, or other factors? If so, please describe how Dollar Thrifty makes those distinctions and describe how, if at all, those factors influence or change whether, or how



quickly, Dollar Thrifty disseminates information to its rental facilities about a particular safety recall or requires application of the recall remedy to the vehicles affected in its fleet.

- 3. Does Dollar Thrifty have a policy or procedure for ensuring that vehicles within its fleet have had safety recall remedies applied before Dollar Thrifty sells or otherwise transfers ownership of those vehicles? If so, please describe that policy or procedure and produce a copy of it. To the extent that policy or procedure has changed over the past three (3) years, please identify and explain: (a) what changes were made; (b) why they were made; and (c) when the changes were made.
- 4. How does Dollar Thrifty receive and manage safety recall notifications and information from vehicle manufacturers? For example, are those notifications received at one location and then distributed from there or are the notifications sent to multiple locations?
- 5. How does Dollar Thrifty inform and educate its rental locations and other involved Dollar Thrifty parties concerning safety recalls to ensure that the affected vehicles are identified and the recall remedy performed on them? Does Dollar Thrifty "flag" or otherwise note vehicles subject to safety recall and does Dollar Thrifty have a policy for how quickly those vehicles are flagged?
- 6. Please describe how Dollar Thrifty enforces its policies or procedures on remedying of its vehicles subject to a safety recall. Please describe, for example, whether there are personnel at Dollar Thrifty dedicated to reviewing Dollar Thrifty's performance of safety recalls and identifying vulnerabilities or weaknesses within Dollar Thrifty or its rental locations as to performance of safety recalls on its vehicles.
- 7. Does Dollar Thrifty subscribe to the agency's recall notification service and have personnel dedicated to receive notifications from that service?
- 8. Does Dollar Thrifty have a policy where it does not rent vehicles subject to a safety recall if NHTSA or the manufacturer had indicated those vehicles should not be driven, or should be "grounded." Please confirm whether this is current Dollar Thrifty policy and, if the converse is true -- that Dollar Thrifty does not "ground" vehicles unless and until NHTSA or the manufacturer instructs that this is appropriate.
- 9. Does Dollar Thrifty report safety concerns to NHTSA when and if it learns of those concerns from its rental locations, its renters, or otherwise? If so, please state whether Dollar Thrifty has personnel designated to do the reporting or whether the reporting is performed at the discretion of individual Dollar Thrifty staff, describe how Dollar Thrifty reports those concerns to NHTSA, (e.g., through an owner complaint form available online at www.safercar.gov, by calling NHTSA's toll-free hotline at 1-888-327-4236, or other means), and state whether it has a policy or procedure for reporting those concerns to NHTSA and, if so, provide a copy of that policy or procedure. In your description, to the extent they exist, identify and explain any minimum criteria or other factors Dollar Thrifty may have for reporting a safety concern to NHTSA (e.g., a certain number of complaints on an issue, Dollar Thrifty's assessment of the risk involved, etc.).

10. Please provide any additional information or documentation that would be helpful to NHTSA's understanding of how Dollar Thrifty views, manages, and executes safety recalls affected its vehicles.

Please provide your company's responses and supporting documentation to our requests within 3 weeks from the date of this letter.

If Dollar Thrifty claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. §1905, the company must submit supporting information together with the materials that are the subject of the confidentiality request, to the Office of Chief Counsel, National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE, Washington, D.C. 20590. Please see 49 CFR Part 512 for further instructions as to what is required to properly file a request for confidential treatment.

Please direct your response to me and note conspicuously on your response the investigation number assigned to this matter (e.g., AQ10-001). Should you have any questions or concerns, do not hesitate to contact me on (202) 366-0209 or by email at jennifer.timian@dot.gov.

Sincerely,

Jennifer T. Timian

Chief, Recall Management Division Office of Defects Investigation

Enforcement