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2011 DEC 23 P 12: 25

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December 21, 2011

Via Federal Express

O. Kevin Vincent, Esq.
Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: AQ 10-001 Rental Vehicle Audit Query

Dear Mr. Vincent:

This letter is in response to your letter, dated November 30, 2011, seeking additional information from The Hertz Corporation ("Hertz") on how we determine whether a recall/repair notice from a manufacturer merits a Safety "S" Hold or a Campaign "C" Hold.

As requested, we have gone back and compiled a list of all "S" Holds and "C" Holds issued by Hertz since December 22, 2010. A spreadsheet is attached which lists the manufacturer involved, the date Hertz received the Safety/Emissions Recall Notice or Service/Campaign Bulletin data, whether we assigned an "S" Hold or "C" Hold, the identification number assigned to the Service/Campaign Bulletin, the Safety Recall Notice or the Emissions Recall Notice and a description of the recall/repair work performed.

Finally, I want to take this opportunity to better explain Hertz's Procedure 7-55 "Compliance with Manufacturer Recalls" – a copy of which was included with my April 6th letter. As noted, in Section A. 3, Hertz receives numerous "recall/repair" notices from manufacturers. The notices include Safety Recall Notices, Emissions Recall Notices, Service Bulletins, Campaign Bulletins, Customer Satisfaction Programs, etc. All Safety Recall Notices merit "S" Holds. Thereafter, the discretion which the Hertz Safety Committee exercises is in two areas:

1. When a Safety Recall Notice is received, a determination is made as to whether the serious nature of the Safety Recall merits Hertz contacting "on rent" customers to arrange for their vehicle to be replaced. This was done with the Cadillac Escalade Safety Recall in December of 2010.
2. Similarly, discretion can be exercised when a Service/Campaign Bulletin is received that does not rise to the level of a NHTSA Safety Recall, but the Hertz Safety Committee nonetheless determines, based upon the nature of the condition described, to "bump up"

the repair to an "S" Hold. This was done with Ford's Customer Satisfaction Program 0011B24 – dated April 4, 2011 on the attachment - which involved Tire Inspection/Replacement.

I trust that you will find the attachment hereto responsive to your request. Should you have additional questions on this matter, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in cursive script that reads "Richard P. McEvily". The signature is written in black ink and is positioned above the printed name.

Richard P. McEvily

cc: Jeffrey Zimmerman
Richard Broome
Deanne Ottaviano – Arent Fox

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Mfg	Date Recall Notice/Service Bulletin Data Received	S or C hold	Service/Campaign Bulletin Number	Safety Recall Notice Number	Emissions Recall Notice Number	Description
Chrysler	1/4/2011	C hold	10-077	n/a	n/a	Inspect/repair water leak on the instrument panel
Chrysler	1/11/2011	C hold	11-001	n/a	n/a	Inspect/repair sliding door noise
Chrysler	1/25/2011	C hold	11-004	n/a	n/a	Inspect/install tie strap to parking brake cables
Chrysler	1/25/2011	S hold	n/a	K25	n/a	Replace HVAC drain tube and grommet to prevent airbag deployment
Chrysler	2/3/2011	C hold	K31	n/a	n/a	Replace HVAC drain tube and grommet to prevent carpet damage
Chrysler	2/8/2011	C hold	11-008	n/a	n/a	Reprogram PCM
Chrysler	2/8/2011	S hold	n/a	K37	n/a	Inspect/reprogram or replace ORC module
Chrysler	3/15/2011	C hold	09-100	n/a	n/a	Refresh TIPM module
Chrysler	5/10/2011	C hold	11-040	n/a	n/a	Inspect cylinder head bolts for proper torque/replace engine
Chrysler	5/10/2011	C hold	L05	n/a	n/a	Replace transmission oil cooler lines
Chrysler	6/7/2011	C hold	10-084	n/a	n/a	Reprogram PCM
Chrysler	6/21/2011	C hold	11-047	n/a	n/a	Reprogram wireless ignition node
Chrysler	6/21/2011	C hold	11-054	n/a	n/a	Install shim on thermostat/replace thermostat housing
Chrysler	6/28/2011	C hold	11-055	n/a	n/a	Reprogram cabin compartment node module
Chrysler	6/28/2011	C hold	11-057	n/a	n/a	Install foam stuffer block into door weather-strip
Chrysler	6/28/2011	C hold	11-060	n/a	n/a	Reprogram radio frequency hub
Chrysler	6/28/2011	C hold	11-061	n/a	n/a	Inspect steering wheel for centered alignment/adjust toe
Chrysler	6/30/2011	S hold	n/a	L23	n/a	Inspect/replace steering column pivot rivets
Chrysler	7/5/2011	C hold	11-062	n/a	n/a	Install stuffer into the right front door weather-strip
Chrysler	7/5/2011	C hold	L15	n/a	n/a	Replace right front and rear door latch
Chrysler	7/12/2011	C hold	11-068	n/a	n/a	Install soft top roof bow shields
Chrysler	7/15/2011	S hold	n/a	L25	n/a	Interrogate WIN module/install detent package
Chrysler	7/26/2011	C hold	11-070	n/a	n/a	Reprogram cabin compartment node module
Chrysler	8/9/2011	C hold	11-076	n/a	n/a	Inspect/replace upper control arm
Chrysler	8/9/2011	C hold	11-080	n/a	n/a	Replace radio

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Mfg	Date Recall Notice/Service Bulletin Data Received	S or C hold	Service/Campaign Bulletin Number	Safety Recall Notice Number	Emissions Recall Notice Number	Description
Chrysler	8/16/2011	C hold	11-082	n/a	n/a	Reprogram body control module
Chrysler	8/16/2011	C hold	L04	n/a	n/a	Replace outer tie rod ends
Chrysler	8/23/2011	C hold	11-075	n/a	n/a	Torque front engine mount bolts
Chrysler	8/23/2011	C hold	11-085	n/a	n/a	Inspect/replace transmission cooler hose
Chrysler	8/30/2011	C hold	L24	n/a	n/a	Inspect/replace soft top
Chrysler	9/15/2011	C hold	11-069	n/a	n/a	Reprogram PCM
Chrysler	9/20/2011	C hold	11-090	n/a	n/a	Reprogram PCM
Chrysler	10/25/2011	C hold	L34	n/a	n/a	Reprogram PCM
Chrysler	10/25/2011	C hold	L35	n/a	n/a	Reprogram PCM
Chrysler	11/1/2011	C hold	11-096	n/a	n/a	Inspect/replace chrome clad wheels
Chrysler	11/8/2011	C hold	11-099	n/a	n/a	Reprogram PCM
Chrysler	11/29/2011	C hold	11-065	n/a	n/a	Reprogram PCM
Chrysler	11/29/2011	C hold	11-092	n/a	n/a	Remove DLC cover
Chrysler	12/6/2011	C hold	11-104	n/a	n/a	Door strap bolts
Ford	1/3/2011	S hold	n/a	0010S14	n/a	Inspect/replace body control module
Ford	1/10/2011	C hold	0010B20	n/a	n/a	Reprogram SYNC
Ford	2/7/2011	S hold	n/a	0011S15	n/a	Install interior door handle reinforcement
Ford	2/28/2011	S hold	n/a	0011S17	n/a	Inspect/replace fuel line
Ford	2/28/2011	S hold	n/a	0011S18	n/a	Replace clock spring
Ford	3/14/2011	C hold	0011B23	n/a	n/a	Reprogram PCM/TCM
Ford	4/4/2011	S hold	0011B24	n/a	n/a	Inspect/replace tires
Ford	5/2/2011	C hold	n/a	n/a	11E02	Reprogram PCM/TCM
Ford	7/11/2011	S hold	n/a	0011C18	n/a	Inspect/replace multifunction switch
Ford	8/8/2011	S hold	n/a	0011S21	n/a	Inspect/repair fuel tank straps
Ford	11/14/2011	C hold	0011L08	n/a	n/a	Emissions label replacement

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Mfg	Date Recall Notice/Service Bulletin Data Received	S or C hold	Service/Campaign Bulletin Number	Safety Recall Notice Number	Emissions Recall Notice Number	Description
Ford	12/12/2011	S hold	n/a	11C11	n/a	Brake shift actuator
Ford	12/12/2011	S hold	n/a	11S23	n/a	Wheel studs
GM	12/20/2010	S hold	n/a	2010370	n/a	Modify seat belt buckles
GM	12/27/2010	C hold	2010424	n/a	n/a	Inspect/seal HVAC air inlet
GM	12/27/2010	S hold	n/a	2010023	n/a	Replace power steering assist motor
GM	12/27/2010	S hold	n/a	2010256	n/a	Replace ignition lock cylinder
GM	12/27/2010	S hold	n/a	2010312	n/a	Inspect safety belt anchors/reinstall anchors
GM	12/29/2010	S hold	n/a	2010426	n/a	Install a new rear axle cross pin
GM	1/14/2011	C hold	2011004	n/a	n/a	Reprogram body control module
GM	1/24/2011	S hold	n/a	2010243	n/a	Modify the second row seat side trim shields
GM	2/14/2011	C hold	2010287	n/a	n/a	Reprogram engine control module
GM	3/7/2011	S hold	n/a	2011057	n/a	Reprogram EEC module
GM	3/15/2011	C hold	2011034	n/a	n/a	Inspect/replace front seat-mounted side impact air bag connectors
GM	3/17/2011	S hold	n/a	2011029	n/a	Inspect/replace rear suspension toe link
GM	4/11/2011	C hold	2011134	n/a	n/a	Inspect/repair seat belt buckle connector
GM	4/13/2011	C hold	n/a	n/a	2011054	Replace EGT sensors
GM	4/25/2011	C hold	2011083	n/a	n/a	Reprogram ECM
GM	5/3/2011	C hold	2011035	n/a	n/a	Noise label missing, install label
GM	5/5/2011	S hold	n/a	2011095	n/a	Tighten wiper motor crank arm nut
GM	5/9/2011	S hold	n/a	2011149	n/a	Inspect/replace I-Shaft
GM	5/12/2011	S hold	n/a	2011142	n/a	Inspect/realign transmission shift linkage
GM	5/23/2011	C hold	2011160	n/a	n/a	Reprogram body control module
GM	6/6/2011	S hold	n/a	2011162	n/a	Reprogram SDM module
GM	6/27/2011	C hold	2011186	n/a	n/a	Replace the battery
GM	6/27/2011	S hold	n/a	2010153	n/a	Disable and remove the heated washer fluid system

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Mfg	Date Recall Notice/Service Bulletin Data Received	S or C hold	Service/Campaign Bulletin Number	Safety Recall Notice Number	Emissions Recall Notice Number	Description
GM	6/30/2011	S hold	n/a	2011191	n/a	Inspect/tighten intermediate steering shaft bolts
GM	7/11/2011	S hold	n/a	2011181	n/a	Install a new transmission adjustment clip
GM	7/15/2011	C hold	2011185	n/a	n/a	Inspect/replace sunroof seal
GM	7/19/2011	C hold	n/a	n/a	2011001	Diesel exhaust fluid calibration
GM	8/3/2011	S hold	n/a	2011222	n/a	Reprogram electronic brake control module
GM	8/3/2011	S hold	n/a	2011224	n/a	Inspect/replace power steering hose and install protective sleeve
GM	8/15/2011	C hold	n/a	n/a	2011195	Reprogram ECM and replace camshaft solenoid valves
GM	8/15/2011	C hold	2011227	n/a	n/a	Reprogram electronic brake control module
GM	8/29/2011	C hold	2011137	n/a	n/a	Reprogram various modules, install a revised fuse location label
GM	8/29/2011	C hold	2011231	n/a	n/a	Reprogram ECM
GM	9/12/2011	C hold	2011243	n/a	n/a	Inspect/tighten prop shaft bolts
GM	10/14/2011	S hold	n/a	2011261	n/a	Update body control module
GM	10/19/2011	C hold	n/a	n/a	2011298	Inspect/reposition fuel filler hose clamp
GM	11/15/2011	S hold	n/a	2011318	n/a	Inspect/torque the power vacuum brake boost pushrod nut
Honda	5/2/2011	S hold	n/a	R65	n/a	Inspect roll-over valve/replace tank unit
Honda	8/8/2011	S hold	n/a	R89	n/a	Update the automatic transmission control module software
Hyundai	3/7/2011	S hold	n/a	097	n/a	Inspect/tighten steering column & I-Shaft bolts, update MDPS software
Hyundai	3/18/2011	C hold	T53	n/a	n/a	ECM update
Hyundai	3/18/2011	C hold	T73	n/a	n/a	Replace cowl top side covers
Hyundai	3/18/2011	C hold	TE3	n/a	n/a	Replace rear sliding door latches
Hyundai	3/18/2011	C hold	TE4	n/a	n/a	Inspect/replace overhead console
Hyundai	4/29/2011	C hold	TF3	n/a	n/a	Inspect/adjust fuel door
Hyundai	6/14/2011	C hold	TF5	n/a	n/a	ECU update
Infiniti	5/18/2011	C hold	P9242	n/a	n/a	Replace TPMS transmitter nuts
Infiniti	5/18/2011	C hold	PC037	n/a	n/a	Inspect/replace front propeller shaft

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Mfg	Date Recall Notice/Service Bulletin Data Received	S or C hold	Service/Campaign Bulletin Number	Safety Recall Notice Number	Emissions Recall Notice Number	Description
Infiniti	6/2/2011	C hold	P1217	n/a	n/a	Reprogram ABS control unit
Infiniti	6/2/2011	C hold	PC091	n/a	n/a	Replace defroster door motor and air mix door motor
Infiniti	9/6/2011	C hold	P1235	n/a	n/a	Install navigation software updates
Infiniti	9/6/2011	C hold	P1239	n/a	n/a	Reprogram multi AV system and replace microphone
Kia	7/26/2011	C hold	SA013	n/a	n/a	Reprogram auto cruise control
Kia	7/26/2011	C hold	SA014	n/a	n/a	Bluetooth display correction
Kia	7/26/2011	C hold	SA017	n/a	n/a	Replace knock sensor
Kia	7/26/2011	C hold	SA038	n/a	n/a	Reprogram ECM
Kia	7/26/2011	C hold	SA058	n/a	n/a	Replace sliding door latches
Kia	7/26/2011	C hold	SA059	n/a	n/a	Reprogram PCM
Kia	7/26/2011	C hold	SA068	n/a	n/a	Reprogram ECM
Kia	7/26/2011	C hold	SC081	n/a	n/a	Reprogram air bag control unit
Kia	11/1/2011	C hold	SA080A	n/a	n/a	Reprogram body control module
Mazda	3/21/2011	C hold	SSP83	n/a	n/a	Inspect/replace audio unit
Mazda	3/21/2011	S hold	n/a	6211B	n/a	Inspect/clean canister line, reprogram PCM
Mazda	5/4/2011	C hold	SSP85	n/a	n/a	Reprogram TPMS module
Mazda	7/11/2011	S hold	n/a	6411F	n/a	Install wiper motor ground harness
Nissan	5/11/2011	S hold	n/a	PC012	n/a	Replace strut mounting insulator
Nissan	5/18/2011	C hold	PC024	n/a	n/a	Inspect/fill transaxle fluid
Nissan	5/18/2011	C hold	PC036	n/a	n/a	Inspect/replace front propeller shaft
Nissan	5/18/2011	C hold	PC044	n/a	n/a	Inspect/correct clearance between windshield and wiper arm
Nissan	5/18/2011	C hold	PM053	n/a	n/a	Replace the instrument cluster
Nissan	5/18/2011	C hold	PM952	n/a	n/a	Inspect/reposition side curtain air bags
Nissan	5/18/2011	C hold	PM958	n/a	n/a	Replace the iPod adapter
Nissan	5/18/2011	S hold	n/a	PC048	n/a	Inspect/replace the suspension lower links

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Mfg	Date Recall Notice/Service Bulletin Data Received	S or C hold	Service/Campaign Bulletin Number	Safety Recall Notice Number	Emissions Recall Notice Number	Description
Nissan	6/2/2011	C hold	PC090	n/a	n/a	Replace defroster door motor and air mix door motor
Nissan	6/27/2011	C hold	n/a	n/a	PC065	emissions recall label
Nissan	8/3/2011	S hold	n/a	PC099	n/a	Tighten and/or tighten front suspension transverse link bolts
Nissan	10/10/2011	C hold	PM165	n/a	n/a	Check the transmission fluid level plug alignment
Nissan	10/17/2011	C hold	PC005	n/a	n/a	Inspect/replace LR suspension knuckle
Nissan	11/30/2011	S hold	n/a	R1010	n/a	Replace fuel level sending unit
Nissan	11/30/2011	S hold	n/a	R1112	n/a	Replace electronic steering control unit
Nissan	12/19/2011	S hold	n/a	PM180	n/a	Replace positive battery terminal
Subaru	4/12/2011	C hold	n/a	n/a	WVM23	Reprogram ECM
Subaru	4/12/2011	C hold	n/a	n/a	WVT30	Reprogram ECM
Subaru	4/12/2011	S hold	n/a	WVP26	n/a	ABS ECU cover
Subaru	4/12/2011	S hold	n/a	WVQ27	n/a	CVT trans fluid cooler inlet hose
Subaru	4/12/2011	S hold	n/a	WVR28	n/a	Steering column electrical connector
Subaru	7/11/2011	C hold	n/a	n/a	WVU31	Reprogram ECM
Subaru	9/21/2011	S hold	n/a	WVV32	n/a	Replace the windshield wiper motor bottom cover
Suzuki	4/8/2011	S hold	n/a	SC-53	n/a	Replace navigation unit
Toyota	2/22/2011	S hold	n/a	A0P	n/a	Replace brake pedal bracket assembly
Toyota	2/24/2011	C hold	90L	n/a	n/a	Modify accelerator pedal/update software
Toyota	4/13/2011	C hold	B0C	n/a	n/a	Inspect protective coating on fuel tank
Toyota	4/13/2011	S hold	n/a	B0B	n/a	Recalibrate tire pressure monitoring system
Toyota	4/27/2011	S hold	n/a	B0F	n/a	Inspect/replace rear propeller shaft
Toyota	4/27/2011	S hold	n/a	B1E	n/a	Preliminary notice - Recall B0E pending remedy information
Toyota	10/18/2011	S hold	n/a	A0A	n/a	Install accelerator pedal reinforcement bar
Toyota	11/29/2011	S hold	n/a	A0H	n/a	Replace steering column upper bracket
VW	2/16/2011	C hold	69H5	n/a	n/a	owner manual supplement
VW	2/16/2011	S hold	n/a	20I4	n/a	Inspect/replace fuel supply line
VW	2/16/2011	S hold	n/a	37E3	n/a	Reprogram gearbox with updated software
VW	2/16/2011	S hold	n/a	97S8	n/a	Inspect/repair or replace power sliding door harness
VW	4/25/2011	S hold	n/a	97V3	n/a	Separate horn wiring from power supply and route wires to separate fuses
VW	6/13/2011	S hold	n/a	28G1	n/a	Replace ignition switch

Report prepared on December 21, 2011