



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

**FEB 28 2012**

**Via Certified Mail**

Mr. Kazuo Higuchi  
Takata Holdings, Inc.  
888 16<sup>th</sup> Street, NW  
Washington, DC 20006

NVS-215aa  
EQ12-002  
12V-029  
12V-030  
12V-047  
12V-055

**Subject: Request for List of Purchasers**

Dear Mr. Higuchi:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Autoliv air bag inflators that several vehicle manufacturers have decided contain a safety related defect. This investigation has been assigned the identification EQ12-002.

In a letter dated January 31, 2012, Toyota Motor Corporation (Toyota) notified the NHTSA that it had decided certain vehicles it manufactured contain a safety related defect. Toyota stated that certain model year 2011 RAV4 vehicles, manufactured from November 24, 2011 through December 19, 2011, contain side curtain airbag inflators with an incorrect propellant specification. In this condition, the inflator may not perform properly, causing one or both curtain shield airbags to not deploy in the event of a crash, which could increase the risk of injury to an occupant. NHTSA assigned recall number 12V-029 to this matter.

We have now received similar reports from other vehicle manufacturers. Specifically, in a letter dated January 31, 2012, Honda Motor Co., Ltd. (Honda) notified the NHTSA of the same defect it determined to exist in certain model year 2012 Honda Accord and Crosstour vehicles. This recall was assigned recall number 12V-030. In a letter dated February 9, 2012, Subaru of America, Inc. (Subaru) notified the NHTSA of the same defect determined to exist in model year 2012 Legacy and Outback vehicles manufactured from December 1, 2011, through December 23, 2011. This recall was assigned recall number 12V-047. In a letter dated February 13, 2012, Nissan North America, Inc. (Nissan) notified the NHTSA of the same defect determined to exist in certain model year 2012 Nissan Versa and Altima vehicles manufactured from November 21, 2011, through December 21, 2011. This recall was assigned recall number 12V-055.



On February 14, 2012, NHTSA mailed an information request (IR) letter to the air bag inflator manufacturer, Autoliv Americas (Autoliv), requesting more information about the defect in its air bag propellant. The contents of that IR letter and subsequent Autoliv response can be found on our website, <http://www.safercar.gov>, by selecting the 'Vehicle Owners' link at the top of the page, then selecting the 'Defect Investigations' link to the left, and entering investigation number 'EQ12002' into the NHTSA Action Number field.

In a February 17, 2012 information request submission, Autoliv noted that 3,483 air bag inflators containing the affected propellant were sold to Takata Holdings, Inc. (your company) for possible distribution or further assembly into motor vehicle air bag assemblies.

The purpose of this request is to obtain a list of purchasers that were sold these air bag assemblies so they are made aware of the various safety defect decisions and are able to determine the need for any similar safety recall on products they may have manufactured using the assemblies. It is also to request your company provide the requisite defect report should it agree that it sold or distributed defective motor vehicle equipment to its purchasers. It is further to ascertain whether your company manufactured and sold or distributed any defective equipment in the replacement market for which it may have responsibility for filing a report with NHTSA and conducting a recall campaign. Accordingly, we require the following information:

1. Provide a list of all customers that received the same or similarly affected Autoliv air bag inflators from your company, whether directly or as part of an air bag assembly, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.
2. State whether your company manufactured and sold or distributed any equipment containing the defect involved in the aforementioned recalls reports in the replacement market and, if so, provide a list of all customers that received the same or similarly affected Autoliv air bag inflators from your company, whether directly or as part of an air bag assembly, and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

Pursuant to Federal law, a manufacturer of motor vehicle equipment must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in that equipment. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report.

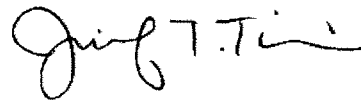
If your company does not agree with Toyota, Honda, Subaru, and Nissan that a safety defect exists in the Autoliv inflators or the air bag assemblies you manufactured using those inflators, your company must submit a written response explaining its decision including all supporting documents, analysis, and/or test reports.

You must respond in writing to this letter. This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitutes 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, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ12-002**. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer T. Timian".

Jennifer T. Timian  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosures