



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

1200 New Jersey Avenue SE
Washington, DC 20590

FEB 23 2012

Via Certified Mail and Email

Mr. Steve M. Kenner
Global Director, Automotive Safety Office
Ford Motor Company
330 Town Center Drive Suite 400
Dearborn, MI 48126-2738

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

Subject: Autoliv Air Bag Modules

Dear Mr. Kenner:

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

The purpose of this letter is to make you aware of a potential safety problem in vehicles that you manufactured and to remind you of your responsibilities under Federal law.

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 module 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 1,565 of the affected air bag modules were sold to Ford Motor Company (your company) for assembly into new motor vehicles. Accordingly, we require the following information:

1. State whether your company has made, or intends to make, a decision that vehicles it manufactured with these modules contain a safety defect, and will notify its purchasers by conducting a safety recall.
2. If your company does not believe that vehicles it manufactured with these modules contain a safety defect, provide all information, such as supporting documents, analysis, and/or test results, that support this opinion.

Pursuant to Federal law, manufacturers of motor vehicles sold, offered for sale, delivered, or imported into the United States 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 one of their vehicles. 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.

Should you decide your vehicles contain a safety defect, we are also reminding your company that it is required to issue timely notification to owners who may have purchased vehicles with the defective air bag modules. The agency's expectation is that this will occur within 60 days of your notification to it of Ford's defect decision. In advance of issuing its owner notification letters, your company must submit a draft of its letter to NHTSA for review. Your company is reminded that this letter must meet the requirements of 49 CFR 577.5, "Notification pursuant to a manufacturer's decision." Your company is further reminded that notifications must be sent to those persons registered under State law as the owners of the vehicles. If particular owners cannot be reasonably ascertained by State records, notifications must be sent to those persons you identify as the most recent purchasers. We are also reminding your company that it is required to notify dealers and distributors as required by 49 CFR 577.13.

In addition to the notification to NHTSA and the draft owner notification letter, please also provide a proposed schedule for conducting the owner notification that includes the following information:

- a. the date on which the search of current state motor vehicle registration records will be initiated in order to update the original owner list;
- b. the approximate date on which the revised owner list will be available to initiate owner notification;

- c. the approximate date on which the owner notification will begin;
- d. the approximate date on which the owner notification will be completed (if the owner notification is to be staggered, give the beginning and ending owner notification date for each segment); and
- e. the approximate date on which the dealer notification will be completed.

Please further note that you must file six quarterly recall status reports as required by 49 CFR 573.7. These reports are to be filed on consecutive yearly quarters beginning with the quarter in which notification to owners begins.

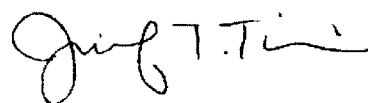
If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state.

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. Response submission may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odj@dot.gov.

Sincerely,



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