

O. Kevin Vincent  
Office of the Chief Counsel (NCC-111)  
National Highway Traffic Safety Administration  
West Building, W41-326  
1200 New Jersey Avenue SE  
Washington, DC 20590

December 5, 2014

Dear Mr. Vincent:

This letter is the written response of Mazda Motor Corporation ("MC") and Mazda Motor of America, Inc. dba Mazda North American Operations ("MNAO") (collectively "Mazda") to the General Order from NHTSA dated November 18, 2014.

NHTSA had requested Mazda to provide information regarding testing of inflators from vehicles outside of the High Absolute Humidity ("HAH") Region. While the detailed response of MC and MNAO to the various subparts is provided below, as an initial matter, Mazda wants to make clear that it did not independently perform any testing of air bag inflator modules in HAH or otherwise. Instead, Mazda provided to Takata Corporation ("Takata") inflators from Mazda vehicles so that Takata could then test such modules. Specifically, for Takata inflators outside the HAH Region, the testing performed by Takata involved the inflators for the passenger-side airbags (PSP1) covered by voluntary safety recall campaigns in 2013 and 2014. (13V130 and 14V362)

In addition to this testing by Takata, Mazda has recently agreed to participate with Toyota and other auto manufacturers in a coordinated, independent, industry-wide joint testing initiative for Takata airbag components. This industry-wide testing of Takata airbag inflators is designed to address the full extent of issues related to the various types of airbag inflator recalls. Although the final details of this initiative have not been determined, Mazda anticipates that an independent engineering analysis expert will be retained to test Takata inflators, including inflators from non-HAH Regions.

On the basis described above, Mazda provides its detailed response to the subpart items 1.a through 1.g in the General Order as follows.

**Request 1**

File a report that describes, in detail, all completed, ongoing or planned testing of takata inflators outside of the HAH Region.

**Mazda's Response to Request 1**

Mazda did not perform any testing of Takata air bag inflator modules, but instead worked with Takata to provide inflators from Mazda vehicles to Takata so that Takata could test them. As of November 28, 2014, Mazda had collected 40 inflators (PSPI) for passenger-side airbags from Mazda vehicles outside the HAH Region and had sent those 40 inflators to Takata to be used for the tank test. As a result of the testing, Takata found no abnormally ruptured inflators from the 40 Mazda vehicle inflators outside of the HAH Region. The test result from Takata is attached as Attachment 1.

The source of the test information is Takata and the information was last gathered on December 1, 2014. Mazda did not previously have any additional responsive documents and no responsive documents have been lost or destroyed.

**Request 1.a**

All documents regarding or relating to the testing contained in your report

**Mazda's Response to Request 1.a**

The test result from Takata is attached as Attachment 1 and the location and dates of the testing are attached as Attachment 2. Mazda does not have any other documents relating to the testing performed by Takata.

The source of the information is Takata, and the information was last gathered on December 1, 2014. Mazda did not previously have any additional responsive documents and no responsive documents have been lost or destroyed.

**Request 1.b**

The location of the testing; the dates of the testing; whether the testing is completed, in progress, or planned; anticipated date of completion of testing; the nature and objective of the testing; and testing protocols.

**Mazda's Response to Request 1.b**

The location and dates of the testing are shown in Attachment 2. The testing of the 40 inflators from Mazda vehicles outside of the HAH Region is completed. The nature and objective of the testing by Takata was to determine if there would be any abnormal rupturing

of the inflators. Mazda does not have a copy of the testing protocol.

The source of the information is Takata and the information was last gathered on December 1, 2014. Mazda did not previously have any additional responsive documents and no responsive documents have been lost or destroyed.

**Request 1.c**

A Roster of all vehicles where the inflator was tested which includes: the model; model year; vehicle build date; VIN; the vehicle's registration history, by location; inflator serial number; inflator type; dealership location with zip code where the inflator unit was returned; whether any deaths, injuries or claims are associated with the inflator in the vehicle; and product specifications for the air bag and inflator modules in each vehicle.

**Mazda's Response to Request 1.c**

The vehicle information for the 40 inflators tested by Takata is shown in Attachment 2.

The source of the information is Takata and Mazda's internal vehicle records. The information was last gathered on December 1, 2014. Mazda did not previously have any additional responsive documents and no responsive documents have been lost or destroyed.

**Request 1.d**

If testing of inflators has been completed, describe in detail the results of the testing and the conclusions you have reached based upon the test results. If your conclusion is that a safety defect does not exist in inflators outside of HAH Region, describe in detail the basis or that conclusion and when the decision was made and by whom. Provide a copy of all documents to or from any person(s) related to the conclusion that no safety defect exists in inflators outside HAH Region.

**Mazda's Response to Request 1.d**

Regarding the 40 inflators from Mazda vehicles, Takata found that there was no abnormal rupturing. Other than for the passenger-side airbags (PSPI) covered by the earlier voluntary safety recall campaigns 13V130 and 14V362, Takata and Mazda are still continuing a detailed investigation in order to identify the root cause of the reported concerns, and a final determination about the existence of a safety defect in inflators outside of the HAH Region has not been made. Concurrent with the investigation described above, Mazda is considering whether to expand the regional recall on both the driver and passenger airbags to outside of the HAH Region. A copy of Takata's analysis flow chart is attached as Attachment 3.

The source of the information is Takata and the information was last gathered on December 1, 2014. Mazda did not previously have any additional responsive documents and no responsive documents have been lost or destroyed.

**Request 1.e**

Sub-part (e) is directed to BMW, Chrysler, Ford, GM, Honda, Mazda, Mitsubishi, Nissan, Subaru and Toyota: State in your report whether or not Takata has performed testing of inflators used in your vehicles outside of the HAH Region. If so, describe in detail what Takata has communicated to you about the testing and/or test results. Produce all documents related to Takata's testing, test results, and your communications, internal and external, related to the testing. State whether you have requested additional information from Takata concerning its testing of inflators outside of the HAH Region which you believe would assist in your determination of whether a defect exists. Identify and describe any information, documents, or categories of information and documents that you reasonably believe that Takata has or reasonably should have concerning inflators or testing of inflators used in your vehicles that Takata has not provided you and which you believe would assist you in testing inflators to determine whether a safety defect exists in inflators outside of the HAH Region.

**Mazda's Response to Request 1.e**

Mazda has provided 40 inflators (PSPI) for passenger-side airbags from Mazda vehicles outside of the HAH Region to Takata for testing. Takata has communicated to Mazda that there were no abnormal rupturing in any of these 40 inflators. See Attachment 1. Mazda has produced all documents related to Takata's testing, test results, and our communications, internal and external, related to the testing. See Attachments 1-3 and attached emails. At this time, Mazda has not requested any additional information from Takata concerning its testing of inflators outside of the HAH Region. Mazda believes that Takata has provided the information and documents necessary for Mazda thus far. Mazda will continue to coordinate and work with Takata in the investigation of these inflators. Concurrent with the investigation described above, Mazda is considering whether to expand the regional recall on both the driver and passenger airbags to outside of the HAH Region.

The source of the information is Takata and Mazda's internal vehicle records. The information was last gathered on December 1, 2014. Mazda did not previously have any additional responsive documents and no responsive documents have been lost or destroyed.

**Request 1.f**

Provide the name, title, and complete contact information for each and every manager or supervisor (at all levels of management or supervisory responsibility) involved in your investigation and decision-making process concerning rupturing air bag inflators manufactured, in whole or in part, by Takata.

**Mazda's Response to Request 1.f**

- MNAO R&D: [REDACTED] (Vice President), Phone: [REDACTED] (US)
- MNAO Quality: [REDACTED] (Director), Phone: [REDACTED]
- MNAO Product Development: [REDACTED] (Group Manager), Phone: [REDACTED]
- MC Quality Div.: [REDACTED] (General Manager), Phone: [REDACTED] (Japan)
- MC Quality Div.: [REDACTED] (Deputy General Manager), Phone: [REDACTED] (Japan)

The source of the information is MC and MNAO. The information was last gathered on December 1, 2014. Mazda did not previously have any additional responsive documents and no responsive documents have been lost or destroyed.

**Request 1.g**

Provide the name, title, and complete contact information for each and every person who prepared and provided input and/or data included in the report contained in Request No. 1, including but not limited to inside or outside counsel, accountants, engineers, employees, and other professionals.

**Mazda's Response to Request 1.g**

- MC field quality Gr: [REDACTED] (Manager), Phone: [REDACTED] (Japan)
- MC field quality Gr: [REDACTED] (Assistant Manager), Phone: [REDACTED] (Japan)
- MC Vehicle Quality Gr: [REDACTED] (Manager), Phone: [REDACTED] (Japan)
- MC Vehicle Quality Gr: [REDACTED] (Assistant Manager), Phone: [REDACTED] (Japan)
- MNAO Product Development: [REDACTED] (Group Manager), Phone: [REDACTED]
- MNAO Quality Office: [REDACTED] (Manager), phone [REDACTED]
- MNAO Quality Office: [REDACTED] (Lead Engineer), phone [REDACTED]
- MNAO Product Quality Engineering: [REDACTED] (Group Manager), phone [REDACTED]
- MNAO Product Quality: [REDACTED] (Manager), phone [REDACTED]
- MNAO Legal Department: [REDACTED] (VP and General Counsel), phone [REDACTED]
- MNAO Legal Department: [REDACTED] (Assistant General Counsel), phone [REDACTED]
- [REDACTED] (outside counsel), phone [REDACTED]

The source of the information is MC and MNAO. The information was last gathered on December 1, 2014. Mazda did not previously have any additional responsive documents and no responsive documents have been lost or destroyed.

In order to swiftly eliminate the potential safety risk for our customers, we will closely communicate with NHTSA and Takata in the future to identify the root cause and address this concern to resolve our customers' concerns as quickly as possible.

If you have any question, feel free to contact us.

Sincerely,

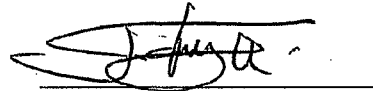
A handwritten signature in black ink, appearing to read 'Takeji Ohya', with a stylized flourish at the end.

Takeji Ohya  
General Manager,  
Quality Division  
Mazda Motor Corporation

AFFIDAVIT

I declare under penalty of perjury that I have undertaken and directed an inquiry reasonably calculated to assure that the answers and production of documents are complete and correct, that I have caused the documents of Mazda Motor Corporation and Mazda Motor of America, Inc. dba Mazda North American Operations to be searched diligently for information and documents responsive to this General Order and produced them to NHTSA, and that, to the best of my knowledge, the answers to the inquiries provided to NHTSA respond completely and correctly to this General Order.

Executed on December 5, 2014 at Hiroshima, Japan.

A handwritten signature in black ink, appearing to read 'Takeji Ohya', is written over a horizontal line.

Takeji Ohya  
General Manager, Quality Division  
Mazda Motor Corporation