

**UNITED STATES DEPARTMENT OF TRANSPORTATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**

1200 New Jersey Avenue, SE
West Building, W41-326
Washington, DC 20590

In re:

PE14-016
Air Bag Inflator Rupture

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RESPONSE TO GENERAL ORDER DIRECTED TO MANUFACTURERS

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

Mitsubishi Motors North America, Inc. ("MMNA") and Mitsubishi Motors Corporation ("MMC") (collectively "Mitsubishi") provide the following responses to the Secretary of Transportation's General Order dated November 18, 2014.

Regarding instruction 3 in the General Order, for all our responses below, we did not previously have any responsive documents that are no longer within our possession, custody or control.

MMC and MMNA understand that Request 1 and its sub-parts relate to and seek information on all completed, ongoing or planned testing of Takata inflators removed from airbags that were installed in Mitsubishi vehicles which is not covered by the testing already conducted at NHTSA request with respect to vehicles that are registered in, or were originally sold in, Florida, Hawaii, Puerto Rico and the U.S. Virgin Islands, as the Request relates to the current ongoing Takata inflator investigation. We understand that documents concerning testing

of Takata inflators removed from airbags installed in Mitsubishi vehicles that are registered in, or were originally sold in, Florida, Hawaii, Puerto Rico and the U.S. Virgin Islands, and subsequently moved to and registered in places outside of the HAH Region, previously have been submitted to NHTSA. With that understanding, MMC and MMNA provide the responses below.

Mitsubishi has only a limited number of documents to produce in response to the General Order, so we are producing them on a disk in .pdf format; but if NHTSA would prefer, we can produce them in the alternative format specified in the General Order. MMC is also preparing English translations of Japanese documents that can be made available to NHTSA should it so desire.

REQUESTS

1. *File a report that describes, in detail, all completed, ongoing or planned testing of Takata inflators outside of the HAH Region. At a minimum, your report must include, but should not be limited to, the following:*

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

RESPONSE:

(1) Completed testing

Testing was conducted by MMC and Takata using two SPI Takata inflators removed from passenger-side airbags that were installed in Mitsubishi vehicles sold and registered in Japan (hereinafter referred to as the “Completed Testing”). These vehicles were both owned by MMC employees and did not have inflators

manufactured by Takata within the manufacturing-year scope of the investigation requested by NHTSA.

(2) Planned testing

- (a) At this time, MMC plans to conduct testing with Takata on 50 or more SPI-type inflators removed from Takata passenger-side airbags which were installed in Mitsubishi vehicle sold and registered in Japan (hereinafter referred to as the “Planned 50 or More Inflators Testing”). Completion of this Planned 50 or More Inflators Testing is scheduled for the end of December, 2014.
- (b) MMC also plans to conduct testing with Takata on SPI-type inflators that will be removed from Takata passenger-side airbags which were installed in Mitsubishi vehicles sold and registered in Japan, after MMC can procure sufficient replacement parts (hereinafter referred to as the “Future Planed Testing”).

Source: a testing result report from Takata, and information from [REDACTED]

General Manager, Quality Information Management Department, and [REDACTED]

[REDACTED] General Manager, No.1 Vehicles Design Department, of MMC

Date information last gathered: November 28th, 2014

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.

RESPONSE:

(1) Re Completed Testing

Location of the testing: MMC's Okazaki factory and Takata's Echigawa factory. Both are located in Japan

Dates of the testing: The testing at MMC's Okazaki factory was conducted on November 20, 2014. The testing at Takata's Echigawa factory was conducted on November 24 and 25, 2014.

The testing was completed.

Nature and objective of the testing:

MMC testing:

- (i) Nature: CT scan
- (ii) Objective: To check wafer propellant amount and installation, and whether any wafers are damaged.

Takata testing:

- (i) Nature: CT scan, air leak test and ballistic test
- (ii) Objective:
 - (a) for CT scan, to check wafer propellant amount and installation, and whether any wafers are damaged, and to measure the diameter of the propellant.
 - (b) for air leak test, to check air leakage efficiency inside of the inflator
 - (c) for tank test, to measure pressure generated upon ignition and to verify expansion performance.

Testing protocols: in accordance with CT scan protocol and ballistic protocol set by NHTSA and Takata

(2) Re Planned 50 or More Inflators Testing and Future Planned Testing:

(a) Planned 50 or More Inflators Testing

Location of testing: Japan

The testing is planned.

Date of planned testing: Completion of this planned testing is scheduled for the end of December, 2014

The nature and objective of the testing: the same as the completed testing

Testing protocols: TBD

(b) Future Planned Testing

Location of testing: Japan

Date of planned testing: Anticipated date of completion for this testing is TBD.

Nature and objective of testing: the same as the completed testing

Testing protocols: TBD

Source: information from [REDACTED] of MMC

Date information last gathered: November 28th, 2014

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.

RESPONSE:

Completed Testing

1	Model	Lancer	Lancer Wagon
2	Model year	2006MY	2005.5MY
3	Vehicle build date	December 16, 2005	April 7, 2005
4	VIN number	██████████	██████████
5	Vehicle's registration history, by location	Aichi, Japan	Aichi, Japan
6	Inflator serial number	JS9076218	JS1287759
7	Inflator type	SPI	SPI
8	Dealership location with zip code where the inflator unit was returned	Okazaki City, Aichi, Japan	Okazaki City, Aichi, Japan
9	Whether any deaths, injuries or claims are associated with the inflator in the vehicle	None	None
10	Product specifications for the air bag and inflator modules in each vehicle	See product specification for airbag module	See product specification for airbag module

Source: information from ██████████ of MMC

Date information last gathered: November 28th, 2014

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 the HAH Region, describe in detail the basis for 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 of the HAH Region.

RESPONSE:

Results of the Completed Testing:

For CT scan: no damage or abnormality in propellant wafer amount or installation was observed

For air leak test: no abnormality was observed

For tank test: no abnormal expansion was observed

Conclusions:

No abnormality was observed with respect to the manufacture or performance of these tested inflators under the testing scope as described above.

Source: a testing result report from Takata and information from [REDACTED] of MMC

Date information last gathered: November 28th, 2014

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.

RESPONSE:

- (1) Whether or not Takata has performed testing of inflators used in your vehicles outside of the HAH Region: Yes
- (2) What Takata has communicated to you about the testing and/or test results: Please see prior responses.
- (3) 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: No
- (4) 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:

Based on our current knowledge, we are not currently aware of any information or documentation that Takata has which have not been provided to us, although that may change as we become aware of additional information.

Source: a testing result report from Takata and information from [REDACTED]

[REDACTED] of MMC

Date information last gathered: November 28th, 2014

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.

RESPONSE:

- (1) [REDACTED] Corporate General Manager, Quality Affairs Office
[REDACTED]
- (2) [REDACTED] Vice Corporate General Manager, Quality Affairs Office
[REDACTED]
- (3) [REDACTED] General Manager, Quality Information Management Department
[REDACTED]
- (4) [REDACTED] Vice Corporate General Manager, Development Engineering Office
[REDACTED]

- (5) [REDACTED] General Manager, No.1 Vehicles Design Department
[REDACTED]
- (6) [REDACTED] Vice Corporate General Manager, Procurement Office
[REDACTED]
- (7) [REDACTED] General Manager, Vehicle Component Parts Procurement
Department
[REDACTED]

Source: information from [REDACTED] of MMC

Date information last gathered: November 28th, 2014

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. I, including but not limited to inside or outside counsel, accountants, engineers, employees and other professionals.

RESPONSE:

- (1) [REDACTED] Corporate General Manager, Quality Affairs
Office [REDACTED]
- (2) [REDACTED] General Manager, Quality Information Management Department
[REDACTED]
- (3) [REDACTED] Manager, Quality Information Management Department
[REDACTED]

- (4) [REDACTED] Quality Information Management Department
[REDACTED]
- (5) [REDACTED] Vice Corporate General Manager, Development Engineering Office
[REDACTED]
- (6) [REDACTED] General Manager, No.1 Vehicles Design Department
[REDACTED]
- (7) [REDACTED] Expert, No.1 Vehicles Design Department
[REDACTED]
- (8) [REDACTED] General Manager, Vehicle Component Parts Procurement
Department
[REDACTED]
- (9) [REDACTED] Expert, Vehicle Component Parts Procurement Department
[REDACTED]
- (10) [REDACTED] Vice Corporate General Manager, Corporate Planning Office
[REDACTED]
- (11) [REDACTED] General Manager, Legal Department
[REDACTED]
- (12) [REDACTED] Expert, Legal Department
[REDACTED]
- (13) [REDACTED] Foreign Attorney, Legal Department
[REDACTED]
- (14) [REDACTED] Manager, Service
[REDACTED]

(15) [REDACTED] Vice President, Fixed Operations

[REDACTED]

(16) [REDACTED] Director, Service

[REDACTED]

(17) [REDACTED] Assistance General Counsel and Director Legal Affairs-
Products

[REDACTED]

Source: information from [REDACTED] of
MMC and [REDACTED] of MMNA

Date information last gathered: November 28th, 2014

Dated: December 1, 2014

MITSUBISHI MOTORS NORTH AMERICA,
INC. AND MITSUBISHI MOTORS
CORPORATION

By: 横幕 康次
Koji Yokomaku
Corporate General Manager
Quality Affairs Office

Registered No. 71 of 2014

NOTARIAL CERTIFICATE

On this 1st day of December, 2014, before me, Susumu Shioya, a notary in and for Tokyo Legal Affairs Bureau, personally appeared Koji Yokomaku, Corporate General Manager, Quality Affairs Office of Mitsubishi Motors Corporation, with satisfactory evidence of his identification, swore before me, in accordance with the legal procedure, that the statement in the attached document is truthful, and affixed his signature to the attached document.

Witness, I set my hand and seal



Susumu Shioya



Notary, Shiba Notary's Office

Tokyo Legal Affairs Bureau

19-14, 3-chome, Nishishimbashi

Minato-ku, Tokyo, Japan.

認

証

嘱託人 三菱自動車工業株式会社

品質統括本部

本部長 横 幕 康 次 (Koji Yokomaku)

は、法定の手続に従って、本公証人の面前で、この証書の記載
が真実であることを宣誓した上、これに署名した。



よって、これを認証する。

三菱自動車工業株式会社

平成26年 12 月 1 日、本公証人役場において

東京都港区西新橋三丁目19番14号

東京法務局所属

公 証 人

Notary

進谷 倫

Susumu SHIOYA

証

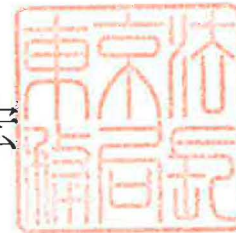
明

上記署名は、東京法務局所属公証人の署名に相違ないものであり、かつ、その押印は、
真実のものであることを証明する。

平成26年 12 月 1 日

東京法務局長

石田 一宏



APOSTILLE

(Convention de La Haye du 5 octobre 1961)

1. Country: JAPAN

This public document

2. has been signed by Susumu SHIOYA

3. acting in the capacity of Notary of the Tokyo Legal Affairs Bureau

4. bears the seal/stamp of Susumu SHIOYA, Notary

Certified

5. at Tokyo

6. December 1, 2014

7. by the Ministry of Foreign Affairs

8. 14-**№ 050204**

9. Seal/stamp:

10. Signature



A. Ogawa

Ayako OGAWA

For the Minister for Foreign Affairs

List of Documents and Drawings included with the Response to the General Order Directed to Manufacturers (In re PE14-016, Air Bag Inflator Rupture)

	File/Page No.	Documents
1	MMC00000001	Product specification for airbag modules installed in vehicles tested in the Completed Testing (prepared by Takata based on document No.2 below and received by MMC from Takata)
2	MMC00000002 to 14	Purchase specification for the above airbag modules, and the drawings referred to in the purchase specification (prepared by MMC and sent to Takata)
3.	(a) MMC00000015	Test reports of the Completed Testing received from Takata. - Report received on November 24, 2014 (covering results of CT scan and air leak test)
	(b) MMC00000016	Test reports of the Completed Testing received from Takata. - Report received on November 25, 2014 (covering results of ballistic test additionally conducted)
	(c) MMC00000017	Test reports of the Completed Testing received from Takata. - Reports received on November 27, 2014
	MMC00000018	English Translation of Test Report (MMC00000017) received from Takata
4	(a) MMC00000019 to 20	Emails from Takata to MMC regarding the results of the Completed Testing (in Japanese)
	MMC00000021 to 22	English translation of the above emails (MMC00000019 to 20)
	(b) MMC00000023 to 25	Emails between MMC and Takata regarding the results of the Completed Testing (in Japanese)
	MMC00000026 to 27	English translation of the above emails (MMC00000023 to 25)
5	(a) MMC00000028	Intra-company emails within MMC regarding the Completed Testing. - Emails to make inquiries to look for the vehicles owned by MMC employees to be tested, based on a decision made through MMC's internal meeting (in Japanese)
	MMC00000029	English translation of the above emails (MMC00000028)
	(b) MMC00000030	Intra-company emails within MMC regarding the Completed Testing. - Emails requesting MMC employees who owned the vehicle to be tested for cooperation (in Japanese)
	MMC00000031	English translation of the above emails (MMC00000030)
	(c) MMC00000032 to 33	Intra-company emails within MMC regarding the Completed Testing. - Emails to report to related departments the test reports of the Completed Testing received from Takata (in Japanese)
	MMC00000034 to 35	English translation of the above emails (MMC00000032 to 33)
	(d) MMC00000036 to 37	Intra-company emails within MMC regarding the Completed Testing. - Emails to report to related departments the test reports of the Completed Testing received from Takata (in Japanese)
	MMC00000038 to 40	English translation of the above emails (MMC00000036 to 37)