

NISSAN

NISSAN NORTH AMERICA, INC.

Corporate Headquarters
One Nissan Way
Franklin, TN 37068

Mailing Address: P.O. Box 685001
Franklin, TN 37068-5001

Telephone: 615.725.1000

August 22, 2014

Mr. Scott Yon
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

Re: EA14-002; NVS-212eer

Dear Mr. Yon:

Enclosed is Nissan's response to the referenced NHTSA Information Request of July 25, 2014 concerning the Agency's peer review of certain 2011-2014 model year Nissan Pathfinder and Murano vehicles equipped with panoramic sunroof systems. A complete response will be submitted on or before September 5, 2014.

The attached reply responds by first stating each question, then the response. Please contact us if you have any questions.

Sincerely,



Donald Neff
Manager
Technical Compliance

Enclosures

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Response to

EA14-002

INTRODUCTION

In responding to this Information Request ("IR"), information has been obtained from those places within Nissan likely to contain such information in the regular and ordinary course of business. When a particular Request seeks "documents" as defined in the IR, reasonable, good faith searches have also been made of corporate records in those places likely to maintain them in the regular and ordinary course of business. Nissan has searched for and produced records that were created up to and on the date the Information Request was received by Nissan, July 28, 2014. Nissan is providing responses to information requests 1 and 5. Nissan appreciates the Agency's understanding in granting an extension to provide the responses to the remaining questions.

The definitions of "documents" and "Nissan", however, are unreasonably broad, vague and ambiguous in the context of the information sought by this IR. For example, "calendars", "appointment books", "financial statements" and "personnel records" would not contain owner complaints, field reports or other information sought by Request 2 pertaining to the alleged defect. Therefore, searches were not made for such "documents", inasmuch as they would not likely contain responsive information. In addition, Nissan has not provided information from persons or entities over which it does not ordinarily exercise control. Nissan understands this IR to seek information on vehicles manufactured for sale in the United States.

Responses are provided after each request, and Attachments are utilized as appropriate. The source of information used as a basis for the data in each Attachment, including the date the data were updated and retrieved, is identified at the beginning of each Attachment, as applicable. If a document itself is the source for the requested information and it is provided, we assume no further source identification is called for. If a document, drawing or component is requested, or if no responsive information is available, we assume no further source identification is called for.

With regard to claims of privilege, Nissan understands that it is acceptable to the Agency for Nissan to identify specific categories of privileged documents rather than any specific document. These specific categories are: 1) communications between outside counsel and Nissan Legal Department employees, other Nissan employees, or other Nissan-represented parties in litigation and claims; 2) communications between Nissan Legal Department employees and other Nissan employees or other Nissan-represented parties in litigation or claims; 3) notes and other work product of outside counsel or of Nissan Legal Department employees concerning communications with Nissan employees or consultants, and the work product of those employees or consultants done for or at the request of outside counsel or Legal Department employees; and 4) other categories to be identified later as necessary. For any privileged documents that are not included in these categories, such documents, if any, will be specifically identified on a separate privilege index at a later time. To the extent that a document is furnished, Nissan is not asserting a privilege claim for that document, although the disclosure of such document does not waive the attorney-client privilege or work-product protection with respect to other documents prepared in connection with the specific litigation or claim or other litigation or claims. In addition, in submitting such documents, we reserve our right to claim the attorney-client privilege and/or work-product protection with respect to analyses that may be prepared subsequently in

connection with these and other cases. Also, we understand documents specifically related to the preparation of the responses are not sought.

Nissan believes NHTSA's policy is to protect the privacy of individuals under exemption 6 of the Freedom of Information Act, 5 U.S.C. Section 552(b)(6). We understand that name, address, and other personal information of owners or other individuals, including Nissan personnel, contained in any of the attachments in this response will not be made available to the public. Therefore, Nissan is not requesting confidential treatment for this information pursuant to 49 CFR, Part 512, but we believe any private information concerning individuals should not be made public.

* * * * *

1. State, by model and model year, the number of subject peer vehicles Nissan has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Nissan, state the following:
- Vehicle identification number (VIN);
 - Make;
 - Model;
 - Model Year;
 - Date of manufacture;
 - Date warranty coverage commenced; and
 - The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

Table 1. Production Data Summary

MODEL	MODEL YEAR	VEHICLES PRODUCED
MURANO	2011	41,864
	2012	45,102
	2013	18,645
	2014	21,707
PATHFINDER	2011	4,579
	2012	3,473
	2013	22,327
	2014	27,013

The information requested in 1.a. through 1.g. is provided, when known, in a Microsoft Access database titled "EA14-002 DATA" on a DVD enclosed as Attachment A.

2. State the number of each of the following, received by Nissan, or of which Nissan is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- Consumer complaints, including those from fleet operators;
- Field reports, including dealer field reports;
- Reports involving a crash, injury or fatality;
- Property damage claims; and
- Third-party arbitration proceedings where Nissan is or was a party to the arbitration; and
- Lawsuits, both pending and closed, in which Nissan is or was a defendant or codefendant.

For subparts "a" through "f," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be

counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and Nissan's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Nissan will supplement this response at a later date.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Nissan's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether the vehicle was occupied when the incident occurred;
- j. Whether the vehicle was in motion when the incident occurred;
- k. Whether a crash is alleged;
- l. Whether property damage is alleged; m. Number of alleged injuries, if any; and n. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Nissan will supplement this response at a later date.

4. Produce copies of all documents related to each item within the scope of Request No. 2 that alleges a crash, injury, or fatality occurred. (Also include all documents related to any incident in which Nissan conducted a field assessment of the incident vehicle, including all photographs.) Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Nissan used for organizing the documents. Describe in detail the search methods and search criteria used by Nissan to identify the items in response to Request No. 2.

Nissan will supplement this response at a later date.

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Nissan to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Nissan's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name and state;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Whether the vehicle was occupied when the incident occurred;
- k. Whether the vehicle was in motion when the incident occurred;
- l. Concern stated by customer; and
- m. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

Table 2. Warranty Data Summary

MODEL	MODEL YEAR	WARRANTY
MURANO	2011	59
	2012	46
	2013	12
	2014	5
PATHFINDER	2013	6
	2014	8

The information requested in 5.a through 5.m is provided, when known, in a Microsoft Access database titled "EA14-002 DATA" on a DVD enclosed as Attachment A.

6. Describe in detail the search methods and search criteria used by Nissan to identify the claims in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used.

The search methods and search criteria used by Nissan to identify the claims identified in response to Request No. 5 are set forth in Attachment B.

7. For each model, model year and panoramic sunroof system design manufactured on the subject peer vehicles, identify the part number, supplier name and a complete street address, contact name, and telephone number.

Nissan will supplement this response at a later date.

8. For each panoramic sunroof system utilized in the subject peer vehicles, provide the following information:

- a. Marketing or Common item name;
- b. Movable or Fixed glass panel system;
- c. Single or multiple panel design (state no. of panels);
- d. Type of movable glass panel deployment design (i.e., Slide-in-Roof; Tilted and Slide over roof; Tilted, Slide and Stacked (for sectioned design), etc.);
- e. Sunshade type (manual or automatic, 1 or 2-piece)
- f. Location of glass panel(s) (i.e., "over 1st-row occupants", "over 2nd- row occupants", etc.);
- g. Size of panel(s) (length x width in centimeters);
- h. Thickness of glass panel(s) (millimeters);
- i. Weight of glass panel(s) (kilograms);
- j. Type of glass used as classified in ANSI/SAE Z26.1 (i.e. laminated, tempered, tempered- laminated, etc.);
- k. Certified to ANSI/SAE Z26.1, Item 3/4 Glazing Material Standard (specify all applicable Table 1 Tests);
- l. Provide any impact test results per ANSI/SAE Z26.1 Test No. 6-14 or per other standards if available;
- m. ANSI/SAE Z26.1 certification marking (i.e. AS1, AS2, etc.) if any;
- n. Explain the reasons for selecting the type, thickness and other relevant aspects of the glass used in the subject component in comparison with other types, thickness, and other relevant aspects of glass, which were considered or which could have been used;
- o. Engineering drawings of the panoramic sunroof system, including a depiction and/or description of how it is assembled in the subject vehicle.

Nissan will supplement this response at a later date.

ATTACHMENT A

DVD with Information Related to Requests 1 and 5

This attachment contains a DVD containing the information related to Request numbers 1 and 5.

ATTACHMENT B

Information Related to Request 6
Warranty Claims Search Criteria

Warranty claims data were gathered from the NNA warranty database July 28, 2014.

The search method used by Nissan to identify the claims identified in response to Request Nos. 2 and 5 is as follows:

Model Codes: R51 (Pathfinder), R52 (Pathfinder), Z51 (Murano)
 Model Years: 2011, 2012, 2013, 2014

Customer or Technician Verbatim must contain at least one word from each of the following 2 lists:

List A	List B
SUNROOF	BREAK
SUN ROOF	SHATTER
PANORAMIC	EXPLODE
	CRACK
	PIECES
	FRAGMENT
	BLOW APART
	FRACTURE
	BLEW APART
	BROKE
	DISENTIGRATE
	CHUNK

Claims matching the keywords as specified above were then reviewed for relevancy to the request. Any documents that were obviously a different issue or otherwise non-responsive were removed. Any documents in which relevancy could not be determined because the verbatim was too vague were included in the submission.

Descriptions of the parts, trouble codes, and labor operation codes are included in the data attached in Attachment A responsive to Request 5.