



6400 Katella Avenue Cypress, CA 90630 Telephone: 714-372-6000 Www.mitsubishicars.com

January 27, 2015

Mr. Frank Borris Director, Office of Defects Investigation National Highway Traffic Safety Administration 1200 New Jersey Ave., SE Washington, DC 20590

RE: October 29, 2014 Letter from the Deputy Administrator – Takata Inflator Recalls – January 27, 2015 Update

Dear Mr. Borris,

In response to the Takata Inflator Recall letter dated October 29, 2014, Mitsubishi Motors North America, Inc. (MMNA), in its continued cooperation with the National Highway Traffic Safety Administration's (NHTSA) investigation on Takata air bags, submits the following update to Questions 1 through 10.

In the event you have any questions or need any additional information, please contact me at your earliest opportunity.

Sincerely,

Mark Chaffin

Vice President, Fixed Operations

Mitsubishi Motors North America, Inc.

O1.

The steps that you will take to (a) expedite Takata's production of replacement air bags; (b) expand the supply of replacement air bags by obtaining replacement air bags from other suppliers; (c) accelerate distribution of replacement air bags to repair facilities; and (d) urge and incentivize your dealers to increase the number of vehicles repaired.

A1.

Please see below

a) MMNA has obtained adequate supply of replacement air bag inflators

Jan. 27, 2015 - No change

b) N/A

Jan. 27, 2015 - No change

c) MMNA force allocated stock to appropriate dealers using a formula based on the proximity and percentage of applicable registered VINs by ZIP code prior to dealer and customer notification. Additional orders are immediately filled.

Jan. 27, 2015 - No change

d) MMNA personnel are consistently contacting dealers to ensure customers are contacted in a timely manner and encouraged to have the repairs completed as quickly as possible. Dealers have also been instructed to prioritize these repairs over any other activities.

Jan. 27, 2015 - No change

Q2.

The measures (including innovative approaches) that you will take to encourage and incentivize vehicle owners to bring their vehicles in for repair (*e.g.*, expanding service hours for more convenience, accommodating owners whose vehicles cannot immediately be repaired by providing loaner vehicles, and the use of print, radio, television, and social media to inform vehicle owners of the recall program).

A2.

Customers in South Florida are being called by MMNA customer relations personnel. When contacted, the customer is advised of the outstanding campaign and an appointment for the repair is immediately made at the dealer of their choice. If they need alternate transportation while the repairs are being completed, MMNA will provide a rental vehicle. In addition, MMNA has provided dealers with owner phone numbers purchased specifically for expediting completion of this campaign. Dealers were instructed to immediately begin contacting customers to set an appointment to have the repairs completed.

An advertisement in a local Puerto Rican newspaper is currently prepared to inform vehicle owners in Puerto Rico of the recall.

Jan. 27, 2015 – MMNA has hired additional staff for the sole purpose of calling owners of all affected vehicles to encourage them to have this important repair completed. We also reiterated to our dealers the importance of their continued independent proactive efforts in contacting affected customers. MMNA will also be sending an email reminder to affected owners that will include a free oil change if they have this campaign completed in a timely manner.

- Q3.

 The efforts you will make to maintain clear, thorough, and up-to-date information regarding the recall on your website, and within your dealer network, to better inform consumers.
- A3.

 MMNA's official statement has been posted on the home page of Mitsubishicars.com. It will provide customers with links to resources they can use to determine if their vehicle model / model year is part of the campaign and the information necessary to repair their vehicle. A recall information link is also conspicuously displayed on the home page. If an affected VIN is keyed in, along with other pertinent information, the campaign description, repair description, safety risk description, and status is prominently displayed.

Jan. 27, 2015 – A Frequently Asked Question document has been posted on Mitsubishicars.com that provides additional information about this campaign and emphasizes the importance of getting the repair completed as quickly as possible.

- Q4.

 Any other interim measures you have taken or can take to address the safety risk and up-to-date information on the number of loaner vehicles you have provided.
- A4.

 In order to reduce the risk of injury, the customer notification letter advised customers to not allow occupants to sit in the front passenger seat until the inflator has been replaced. 4% of customers having their vehicle repaired were provided a loaner.

Jan. 27, 2015 – MMNA continues to offer loaner cars to customers that need one.

- Q5.

 A description of any ongoing efforts to evaluate the safety risks of Takata air bags in your vehicles, including a description of testing that is currently underway or planned.
- A5.

 Dealers have been instructed to return replaced inflators to Takata immediately after the repair has taken place. Dealers are required to provide MMNA with the associated tracking numbers after shipment has commenced. MMNA is instructing Takata to inspect, test and evaluate these returned inflators, and timely provide MMNA with the results.

Jan. 27, 2015 - MMNA is an active participant in the Independent Testing Coalition.

Q6.

Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered within the hot, humid regions of the country identified in NHTSA's consumer advisory.

A6.

To date, MMNA has no reported incidents of ruptured inflators on any Mitsubishi vehicles equipped with the airbag inflator. At this time, MMNA does not have any data regarding replaced inflators within the hot, humid regions of the country identified in NHTSA's consumer advisory, however, we are working with ODI and Takata in expediting the testing and evaluation process.

Jan. 27, 2015 – To date, MMNA has no reported field incidents of ruptured inflators on any Mitsubishi vehicles equipped with the air bag inflator. Through Jan. 11, 2015, 23 air bag inflators were recovered from the hot, humid regions and tested by Takata. One air bag inflator ruptured during testing. The other 22 air bag inflators deployed as designed.

07.

Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered outside of the hot, humid regions of the country identified in NHTSA's consumer advisory.

A7.

To date, MMNA has no reported incidents of ruptured inflators on any Mitsubishi vehicle equipped with the airbag inflator. At this time, MMNA does not have any data regarding replaced inflators outside the hot, humid regions of the country identified in NHTSA's consumer advisory.

Jan. 27, 2015 – To date, MMNA has no reported field incidents of ruptured inflators on any Mitsubishi vehicles equipped with the air bag inflator. Through Jan. 11, 2015, three air bag inflators were recovered outside the hot, humid regions and tested by Takata. All three air bag inflators deployed as designed. Also, as mentioned in our December 2, 2014 response to NHTSA's November 18, 2014 General Order, Takata had planned, and is now performing, testing on SPI-type air bag inflators recovered from Mitsubishi vehicles sold and registered in Japan. When Takata provides results of that Japan testing, we will update NHTSA accordingly.

Q8.

The testing protocols/methodologies used (or that will be used) to conduct or gather the information described in Nos. 5 through 7 above.

A8.

MMNA is instructing Takata to conduct testing by utilizing their protocols / methodologies and timely provide MMNA with the results.

Jan. 27, 2015 - MMNA is an active participant in the Independent Testing Coalition

Q9.

Up-to-date information regarding the number of vehicles covered by your recall, the number of those vehicles still in service and the number of vehicles remedied with a replacement air bag.

A9.

The number of vehicles covered by the Special Service Campaign is 11,985 and 99 have been remedied with a replacement inflator. At this time, MMNA is unable to determine the number of vehicles that are out of service – a customer notification letter was sent to the registered owner of all affected vehicles.

Jan. 27, 2015 – The number of vehicles covered by the Safety Recall Campaign is 22,259. 1,321 have been remedied with a replacement inflator.

O10.

Information on the testing, if any, you have done on the replacement air bags.

A10.

MMNA is relying on Takata to provide replacement inflators that meet OEM specifications.

Jan. 27, 2015 - No change

NOTE: The information above pertains to the Safety Recall Campaign involving 2004 - 2005 Mitsubishi Lancer. Although the 2006 - 2007 Mitsubishi Raider is affected by this service action, at this time, we do not have adequate information to respond to the questions and will defer to the vehicle manufacturer, Chrysler.



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February 10, 2015

Mr. Frank Borris Director, Office of Defects Investigation National Highway Traffic Safety Administration 1200 New Jersey Ave., SE Washington, DC 20590

RE: October 29, 2014 Letter from the Deputy Administrator – Takata Inflator Recalls – February 10, 2015 Update

Dear Mr. Borris,

In response to the Takata Inflator Recall letter dated October 29, 2014, Mitsubishi Motors North America, Inc. (MMNA), in its continued cooperation with the National Highway Traffic Safety Administration's (NHTSA) investigation on Takata air bags, submits the following update to Questions 1 through 10.

In the event you have any questions or need any additional information, please contact me at your earliest opportunity.

Sincerely,

Mark Chaffin

Vice President, Fixed Operations

Mitsubishi Motors North America, Inc.

Q1.

The steps that you will take to (a) expedite Takata's production of replacement air bags; (b) expand the supply of replacement air bags by obtaining replacement air bags from other suppliers; (c) accelerate distribution of replacement air bags to repair facilities; and (d) urge and incentivize your dealers to increase the number of vehicles repaired.

A1.

Please see below

a) MMNA has obtained adequate supply of replacement air bag inflators.

Jan. 27, 2015 – No change

Feb. 9, 2015 - No change

b) N/A

Jan. 27, 2015 – No change

Feb. 9, 2015 - No change

c) MMNA force allocated stock to appropriate dealers using a formula based on the proximity and percentage of applicable registered VINs by ZIP code prior to dealer and customer notification. Additional orders are immediately filled.

Jan. 27, 2015 – No change

Feb. 9, 2015 - No change

d) MMNA personnel are consistently contacting dealers to ensure customers are contacted in a timely manner and encouraged to have the repairs completed as quickly as possible. Dealers have also been instructed to prioritize these repairs over any other activities.

Jan. 27, 2015 – No change

Feb. 9, 2015 – No change

Q2.

The measures (including innovative approaches) that you will take to encourage and incentivize vehicle owners to bring their vehicles in for repair (e.g., expanding service hours for more convenience, accommodating owners whose vehicles cannot immediately be repaired by providing loaner vehicles, and the use of print, radio, television, and social media to inform vehicle owners of the recall program).

A2.

Customers in South Florida are being called by MMNA customer relations personnel. When contacted, the customer is advised of the outstanding campaign and an appointment for the repair is immediately made at the dealer of their choice. If they need alternate transportation while the repairs are being completed, MMNA will provide a rental vehicle. In addition, MMNA has provided dealers with owner phone numbers purchased specifically for expediting completion of this campaign. Dealers were instructed to immediately begin contacting customers to set an appointment to have the repairs completed.

An advertisement in a local Puerto Rican newspaper is currently prepared to inform vehicle owners in Puerto Rico of the recall.

Jan. 27, 2015 – MMNA has hired additional staff for the sole purpose of calling owners of all affected vehicles to encourage them to have this important repair completed. We also reiterated to our dealers the importance of their continued independent proactive efforts in contacting affected customers. MMNA will also be sending an email reminder to affected owners that will include a free oil change if they have this campaign completed in a timely manner.

Feb. 9, 2015 – In the email reminder, MMNA will be providing affected owners a \$40 Visa® gift card instead of a free oil change if they have this campaign completed in a timely manner. This incentive will also be communicated in a follow-up owner notification letter.

- Q3.

 The efforts you will make to maintain clear, thorough, and up-to-date information regarding the recall on your website, and within your dealer network, to better inform consumers.
- A3.

 MMNA's official statement has been posted on the home page of Mitsubishicars.com. It will provide customers with links to resources they can use to determine if their vehicle model / model year is part of the campaign and the information necessary to repair their vehicle. A recall information link is also conspicuously displayed on the home page. If an affected VIN is keyed in, along with other pertinent information, the campaign description, repair description, safety risk description, and status is prominently displayed.

Jan. 27, 2015 – A Frequently Asked Question document has been posted on Mitsubishicars.com that provides additional information about this campaign and emphasizes the importance of getting the repair completed as quickly as possible.

Feb. 9, 2015 - No change

04.

Any other interim measures you have taken or can take to address the safety risk and up-todate information on the number of loaner vehicles you have provided.

A4.

In order to reduce the risk of injury, the customer notification letter advised customers to not allow occupants to sit in the front passenger seat until the inflator has been replaced. 4% of customers having their vehicle repaired were provided a loaner.

Jan. 27, 2015 – MMNA continues to offer loaner cars to customers that need one.

Feb. 9, 2015 – No change

Q5.

A description of any ongoing efforts to evaluate the safety risks of Takata air bags in your vehicles, including a description of testing that is currently underway or planned.

A5.

Dealers have been instructed to return replaced inflators to Takata immediately after the repair has taken place. Dealers are required to provide MMNA with the associated tracking numbers after shipment has commenced. MMNA is instructing Takata to inspect, test and evaluate these returned inflators, and timely provide MMNA with the results.

Jan. 27, 2015 – MMNA is an active participant in the Independent Testing Coalition.

Feb. 9, 2015 – No change

Q6.

Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered within the hot, humid regions of the country identified in NHTSA's consumer advisory.

A6.

To date, MMNA has no reported incidents of ruptured inflators on any Mitsubishi vehicles equipped with the airbag inflator. At this time, MMNA does not have any data regarding replaced inflators within the hot, humid regions of the country identified in NHTSA's consumer advisory, however, we are working with ODI and Takata in expediting the testing and evaluation process.

Jan. 27, 2015 – To date, MMNA has no reported field incidents of ruptured inflators on any Mitsubishi vehicles equipped with the air bag inflator. Through Jan. 11, 2015, 23 air bag inflators were recovered from the hot, humid regions and tested by Takata. One air bag inflator ruptured during testing. The other 22 air bag inflators deployed as designed.

Feb. 9, 2015 – To date, MMNA has no reported field incidents of ruptured inflators on any Mitsubishi vehicles equipped with the air bag inflator. Through Feb. 9, 2015, 128 air bag inflators were recovered from the hot, humid regions and tested by Takata. Eight air bag inflators ruptured during testing. The other 120 air bag inflators deployed as designed.

Q7.

Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered outside of the hot, humid regions of the country identified in NHTSA's consumer advisory.¹

A7.

To date, MMNA has no reported incidents of ruptured inflators on any Mitsubishi vehicle equipped with the airbag inflator. At this time, MMNA does not have any data regarding replaced inflators outside the hot, humid regions of the country identified in NHTSA's consumer advisory.

Jan. 27, 2015 – To date, MMNA has no reported field incidents of ruptured inflators on any Mitsubishi vehicles equipped with the air bag inflator. Through Jan. 11, 2015, three air bag inflators were recovered outside the hot, humid regions and tested by Takata. All three air bag inflators deployed as designed. Also, as mentioned in our December 2, 2014 response to NHTSA's November 18, 2014 General Order, Takata had planned, and is now performing, testing on SPI-type air bag inflators recovered from Mitsubishi vehicles sold and registered

in Japan. When Takata provides results of that Japan testing, we will update NHTSA accordingly.

Feb. 9, 2015 – The three air bag inflators recovered through Jan. 11, 2015, have been recategorized as being recovered from the hot, humid regions. Through Feb. 9, 2015, there has been no air bag inflators recovered outside the hot, humid regions and tested by Takata.

08.

The testing protocols/methodologies used (or that will be used) to conduct or gather the information described in Nos. 5 through 7 above.

A8.

MMNA is instructing Takata to conduct testing by utilizing their protocols / methodologies and timely provide MMNA with the results.

Jan. 27, 2015 – MMNA is an active participant in the Independent Testing Coalition.

Feb. 9, 2015 - No change

Q9.

Up-to-date information regarding the number of vehicles covered by your recall, the number of those vehicles still in service and the number of vehicles remedied with a replacement air bag.

A9.

The number of vehicles covered by the Special Service Campaign is 11,985 and 99 have been remedied with a replacement inflator. At this time, MMNA is unable to determine the number of vehicles that are out of service – a customer notification letter was sent to the registered owner of all affected vehicles.

Jan. 27, 2015 – The number of vehicles covered by the Safety Recall Campaign is 22,259. 1,321 have been remedied with a replacement inflator.

Feb. 9, 2015 – The number of vehicles covered by the Safety Recall Campaign is 22,259. 1,592 have been remedied with a replacement inflator.

O10.

Information on the testing, if any, you have done on the replacement air bags.

A10.

MMNA is relying on Takata to provide replacement inflators that meet OEM specifications.

Jan. 27, 2015 - No change

Feb. 9, 2015 - No change

NOTE: The information above pertains to the Safety Recall Campaign involving 2004 - 2005 Mitsubishi Lancer. Although the 2006 - 2007 Mitsubishi Raider is affected by this service action, at this time, we do not have adequate information to respond to the questions and will defer to the vehicle manufacturer, Chrysler.