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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 18, 2015

Mr. Francis Dance
Safety Integrity & Recall Manager
BMW of North America, LLC
300 Chestnut Ridge Road
Woodcliff Lake, NJ 07677

Dear Mr. Dance:

As you know, as part of the National Highway Traffic Safety Administration's (NHTSA) ongoing investigation of defective Takata air bag inflators, and NHTSA's oversight of the associated remedies, NHTSA has opened a Coordinated Remedy Program proceeding to facilitate and ensure, industry-wide, the adequate and appropriate remedy of affected vehicles. *See Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators*, 80 FED. REG. 32,197 (June 5, 2015). The risk of harm presented by the defective Takata air bag inflators transcends the scope of the usual Safety Act recall. Further, remedy programs individual to each Vehicle Manufacturer[1] creates a patch-work solution that NHTSA believes may not adequately address the safety risks presented by the defective inflators within a reasonable time. Thus, the Coordinated Remedy Program is a necessary step in achieving our shared safety goals, including that consumers in the United States have the protections they were promised and expect when it comes to the safe functioning of their vehicle air bags.

Through the Coordinated Remedy Program proceeding NHTSA seeks to promote a full, open, and collaborative process, without compromising NHTSA's objectives of safety, that facilitates thoughtful problem-solving and engages the affected Vehicle Manufacturers, Takata,[2]

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and other Tier One Suppliers[3] in developing and implementing solutions to this significant safety risk. This process will develop solutions for the prioritization, organization, and phasing of remedy programs to appropriately address the multitude of factors contributing to the complexity of these recall programs. These factors include, but are not limited to, environmental factors (including air bag age), sourcing and production of replacements given the volume of parts required, urgency of timely vehicle remedies, allocation, delivery, installation, owner notification, and adequacy of the remedy (including subsequent replacement of certain initial replacement inflators). To be clear, through this process NHTSA seeks, and expects, timely 100% completion rates for the recall and remedy of defective Takata air bag inflators. Further, NHTSA hopes to inspire the creativity, energy, and problem-solving determination of each Vehicle Manufacturer and Tier One Supplier, and of Takata, in service to the American people and your customers.

Accordingly, NHTSA requests that you answer the attached questions truthfully and completely as a comment to Docket No. NHTSA-2015-0055. To be most helpful, NHTSA asks that you submit your responses within 21 days following receipt of this letter. As you will see, the questions posed largely track the questions for public comment set forth in our June 5, 2015 Federal Register notice and will facilitate robust dialog in future meetings with the agency. We are happy to work with you to address concerns you may have about confidentiality or issues otherwise related to the sharing of business information. There will be a public docket as well as a confidential docket to protect confidential information from public view. Requests for confidentiality of submissions to the docket can be made pursuant to the procedures set forth in 49 CFR Part 512.

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The staff at NHTSA look forward to working with you to solve this unprecedented challenge. Please feel free to contact us with questions or concerns about this request, or the Coordinated Remedy Program proceeding.

Frank S. Borris II
Acting Associate Administrator for Enforcement

Attachment: Coordinated Remedy Questions

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cc: Mr. Phil Hartnagel, Chrysler (FCA US LLC)
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ATTACHMENT: Coordinated Remedy Questions

A. General Recall Status

1. Please provide a spreadsheet with the most current information regarding the recall(s) of your motor vehicles with Takata air bag inflators, including, but not limited to: (1) the make, model, model year, and Takata inflator type (e.g., PSDI, PSPI, etc.) for each affected vehicle; (2) the total number of vehicles subject to the Recall(s), broken down by make, model, and model year, vehicles still in service, and vehicles ever registered in areas of high absolute humidity[1]; (3) the original and replacement inflator model identifier(s), supplier(s), number of replacement inflators to be supplied, and number of vehicles remedied to date (overall and high absolute humidity region); (4) whether the current remedy(ies) in subpart (3) is an interim "like for like" remedy, which will require a subsequent recall/remedy program; and (5) if the answer to subpart (4) is yes, then the alternative[2] replacement inflator type(s), supplier(s), and number of alternative replacement inflators to be supplied. Please segregate your response by the inflator type installed in the motor vehicle as original equipment, using the table in **Appendix A** as a template. To the extent any of the data is based on a date other than the date of your response, please indicate the date on which the data was current. Please also describe the information on which you relied in calculating the figures for subpart (2).

2. Please explain how you will be able to trace the replacement inflators once the remedy has been completed - i.e., how you will be recording which replacement inflator (and from which supplier) was installed into which motor vehicle, and whether or not the barcode information for the remedy replacement is being recorded as part of this process. Are there specific requirements we should agree to set as to how every manufacturer will identify and trace replacement inflators? If so, what are your suggestions on those requirements?

3. Please explain what efforts you have taken, or you plan to take, to maximize recall completion rates (for both any interim remedy or alternative remedy program), whether by engaging with vehicle owners through new and/or traditional media, direct contacts with vehicle owners, and/or other innovative means of bringing consumer attention to the importance of completing the remedy? Please also include assessments of, and solutions for overcoming, consumer apathy and/or failure to respond to recall notices. For owners receiving an interim remedy inflator, please discuss your plans for educating owners while at the dealer about the need to return for a final remedy including collecting and storing additional consumer contact information.

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B. Coordinated Remedy Program

In requesting public comment in the Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators, NHTSA posed a number of broad questions. *See* 80 FED. REG. 32197 (June 5, 2015). Below, NHTSA requests specific information from you in connection with these broad topics in order to facilitate a robust dialog in future meetings with the agency and other industry actors. Unless otherwise specified, we ask that your responses to these questions be specific to each inflator type you have recalled or have decided to recall (e.g., PSDI, PSDI-4, PSDI-4K, PSDI-5, PSPI, PSPI-L, SPI, etc.).

Topic 1: Whether, and how, NHTSA should order Takata and/or other regulated entities to source replacement parts for Manufacturers.

4. For each type of inflator you are recalling, please provide a list of Tier 1 air bag inflator supplier(s) from whom you are, or will be, obtaining replacement inflators. For each supplier you list, identify and describe the replacement inflators, including the chemistry of the main propellant, you have obtained or will be obtaining, and in what volumes, along with any known future or anticipated delivery date(s). Have you entered into any formalized agreement(s) for the supply of these parts?

5. To the extent that you have identified one or more potential Tier 1 air bag inflator suppliers, but have not yet formalized any agreement, please identify and describe the replacement inflators being discussed, as well as potential production volumes. Describe with as much specificity as possible the current status of those arrangements.

6. Have you reached out to any Tier 1 air bag inflator suppliers that have been unable or reluctant to produce replacement inflators for your company? If so, which inflator(s) and what reasons were you given for that inability or reluctance?

7. What challenges, if any, have you encountered, are you encountering, or do you expect to encounter in the future, in securing replacement inflators from any source, Takata or otherwise? How can NHTSA, Takata, other OEMs, or any other third party assist with any of the challenges?

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8. For each inflator type you have recalled or will be recalling, when do you expect to have a sufficient number of replacement inflators to remedy all of your vehicles covered by the recall(s), regardless of geographic region? What is the basis for this date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

9. As to each inflator type you identified in question 8 above, please share a timeline for the production of replacement inflators for your vehicles, including: (i) the current status of the design, testing, and qualification of any alternative remedy parts; (ii) the first date on which each type of remedy inflator was, or will be, produced or manufactured, and the anticipated rate

of weekly production thereafter; and, (iii) the schedule on which the replacement inflators are being, or will be, distributed to dealers for use as remedy parts, designated by geographical region and/or state.

10. What steps have you taken, or do you plan to take in the future, to expedite the production of remedy parts from any source, Takata or otherwise?

11. What challenges, if any, do you expect that you would face, or that the industry as a whole would face, if NHTSA issued an accelerated remedy directive? How can NHTSA, Takata, other vehicle manufacturers, or any other third party assist in addressing these challenges?

Topic 3: Whether, and how, NHTSA should order Takata and/or Manufacturers to prioritize certain vehicles or certain regions in its allocation of replacement parts

12. What methods are you considering with respect to allocating replacement inflators throughout the United States? What plans have you made or steps have you taken regarding the allocation of replacement inflators to cover those vehicles that appear to be most at risk first - i.e., older vehicles and those currently registered in, or that have ever been registered in, areas of high absolute humidity? What process or method would you recommend for prioritizing vehicle populations for risk of inflator rupture (either for the vehicles you produced or for all affected/ recalled vehicles), what data should be used for this purpose, and who should be involved in this process (one or all OEMs, NHTSA, Takata, other tier-ones)?

13. When do you expect to have a sufficient number of replacement inflators to remedy vehicles subject to the recall(s) that are currently registered in, or that have ever been registered in, regions of high absolute humidity? What is the basis for date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

14. Are you contemplating any future recall, or other service, action(s) for vehicles that are not currently within the scope of the recall(s)? If so, what is the basis for any such action? Which makes, models, and model years would be included? When do you anticipate that you would commence any such action?

15. What, if any, obligations do you have, or can you anticipate having, in countries other than the United States to conduct remedy programs and/or provide replacement air bag inflators in relation to the recalled Takata air bag inflators? If any, how do you plan to address these multiple obligations?

Topic 4: Whether, and how, NHTSA should order a replacement schedule for replacement frontal inflator/air bags if Takata and/or Manufacturers cannot provide assurances for the ongoing safety of the inflators

16. To the extent that you are obtaining replacement inflators from Takata, please explain the steps you are taking to assure the safety of these replacement inflators.

17. What efforts have you taken, are you taking, or do you plan to take in the future to find or develop alternative remedy parts, including any plans to obtain parts from other suppliers or use Takata inflators not currently covered by Recall No. 15E-040. If so, what is the anticipated timeline for the development of the alternative remedy?

18. Please explain any testing of remedy parts that is being conducted by you or by any third party on your behalf.

19. Please identify, by make, model, and model year, every motor vehicle that you have produced that uses an ammonium nitrate-based propellant in any air bag inflator, which is not already covered by the recall(s). In the event that all or part of the population of these motor vehicles contains the same defective condition at issue in the current Takata air bag inflator recall(s), have you devised or contemplated any plan to address such a defect? If so, please explain that plan or contemplated plan.

20. Are you currently, or have you contemplated, conducting any parts surveillance or recovery actions for other types of Takata air bag inflators not currently covered by Recall No. 15E-040? If so, please explain what you have done, or are contemplated doing, and why.

Topic 5: Whether, and how, NHTSA should order additional authorized repair facilities, or any other regulated entity, to aid Takata and/or Manufacturers in timely completing remedy programs

21. Please explain the steps you have taken, or that you plan to take in the future and approximately when you plan to do so, to urge and/or incentivize your dealers and repair facilities to increase the number of motor vehicles remedied as it relates to the Takata air bag inflators.

22. Other than availability of replacement parts, what challenges and/or limitations, if any, have you encountered, are you encountering, or do you expect to encounter in the future, with respect to the capacity of your dealers and repair facilities to remedy vehicles brought in for service under the Recall(s) within a reasonable amount of time?

23. Is your company able to expand beyond its franchised dealer network in order to expand the number of authorized repair facilities able to perform inflator or module replacements? What types or levels of certification are required in your view for a technician to safely and properly apply the recall remedy? Do your franchise agreements, state laws, or other legal requirements eliminate or impede this option? Please explain in detail and identify how NHTSA could assist in reducing or eliminating these impediments.

Topic 6: Your Suggestions

24. Please feel free to share any constructive ideas on how NHTSA could most effectively coordinate, or assist in the coordination of, the prioritization, organization, and phasing of recall and remedy programs involving the defective Takata frontal air bag inflators.

25. Please feel free to elaborate on ideas and/or methods for ensuring that Vehicle Manufacturers and Takata achieve satisfactory (100%) recall/remedy completion rates.

26. Please provide any further direction, commentary, or information that you believe may be helpful or useful in this coordinated remedy proceeding.

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1200 New Jersey Avenue SE.
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Mr. Phil Hartnagel
Senior Manager VSO
Chrysler (FCA US LLC)
800 Chrysler Drive
Auburn Hills, MI 48326

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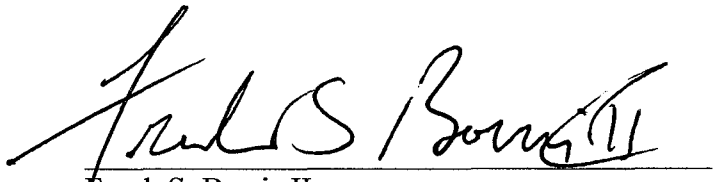

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Mr. Todd Fronckowiak
Global Automotive Safety Compliance Office
Ford Motor Company
Fairlane Plaza South, Suite 500
330 Town Center Drive
Dearborn, MI 48126-2738

Dear Mr. Fronckowiak:

As you know, as part of the National Highway Traffic Safety Administration's (NHTSA) ongoing investigation of defective Takata air bag inflators, and NHTSA's oversight of the associated remedies, NHTSA has opened a Coordinated Remedy Program proceeding to facilitate and ensure, industry-wide, the adequate and appropriate remedy of affected vehicles. *See Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators*, 80 FED. REG. 32,197 (June 5, 2015). The risk of harm presented by the defective Takata air bag inflators transcends the scope of the usual Safety Act recall. Further, remedy programs individual to each Vehicle Manufacturer[1] creates a patch-work solution that NHTSA believes may not adequately address the safety risks presented by the defective inflators within a reasonable time. Thus, the Coordinated Remedy Program is a necessary step in achieving our shared safety goals, including that consumers in the United States have the protections they were promised and expect when it comes to the safe functioning of their vehicle air bags.

Through the Coordinated Remedy Program proceeding NHTSA seeks to promote a full, open, and collaborative process, without compromising NHTSA's objectives of safety, that facilitates thoughtful problem-solving and engages the affected Vehicle Manufacturers, Takata,[2]

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[1] To date, this includes: BMW of North America, LLC ("BMW"), Chrysler Group, LLC ("Chrysler"), Daimler Trucks North America, LLC ("DTNA"), Ford Motor Company ("Ford"), General Motors, LLC ("GM"), American Honda Motor Company ("Honda"), Mazda North American Operations ("Mazda"), Mitsubishi Motors North America, Inc. ("Mitsubishi"), Nissan North America, Inc. ("Nissan"), Subaru of America, Inc. ("Subaru"), and Toyota Motor Engineering and Manufacturing ("Toyota").

[2] TK Holdings, Inc.

and other Tier One Suppliers[3] in developing and implementing solutions to this significant safety risk. This process will develop solutions for the prioritization, organization, and phasing of remedy programs to appropriately address the multitude of factors contributing to the complexity of these recall programs. These factors include, but are not limited to, environmental factors (including air bag age), sourcing and production of replacements given the volume of parts required, urgency of timely vehicle remedies, allocation, delivery, installation, owner notification, and adequacy of the remedy (including subsequent replacement of certain initial replacement inflators). To be clear, through this process NHTSA seeks, and expects, timely 100% completion rates for the recall and remedy of defective Takata air bag inflators. Further, NHTSA hopes to inspire the creativity, energy, and problem-solving determination of each Vehicle Manufacturer and Tier One Supplier, and of Takata, in service to the American people and your customers.

Accordingly, NHTSA requests that you answer the attached questions truthfully and completely as a comment to Docket No. NHTSA-2015-0055. To be most helpful, NHTSA asks that you submit your responses within 21 days following receipt of this letter. As you will see, the questions posed largely track the questions for public comment set forth in our June 5, 2015 Federal Register notice and will facilitate robust dialog in future meetings with the agency. We are happy to work with you to address concerns you may have about confidentiality or issues otherwise related to the sharing of business information. There will be a public docket as well as a confidential docket to protect confidential information from public view. Requests for confidentiality of submissions to the docket can be made pursuant to the procedures set forth in 49 CFR Part 512.

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The staff at NHTSA look forward to working with you to solve this unprecedented challenge. Please feel free to contact us with questions or concerns about this request, or the Coordinated Remedy Program proceeding.

Frank S. Borris II
Acting Associate Administrator for Enforcement

Attachment: Coordinated Remedy Questions

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Mr. Phil Hartnagel, Chrysler (FCA US LLC)
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Mr. Brian Latouf, General Motors
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Mr. Donald Neff, Nissan North America, Inc.
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June 18, 2015

ATTACHMENT: Coordinated Remedy Questions

A. General Recall Status

1. Please provide a spreadsheet with the most current information regarding the recall(s) of your motor vehicles with Takata air bag inflators, including, but not limited to: (1) the make, model, model year, and Takata inflator type (e.g., PSDI, PSPI, etc.) for each affected vehicle; (2) the total number of vehicles subject to the Recall(s), broken down by make, model, and model year, vehicles still in service, and vehicles ever registered in areas of high absolute humidity[1]; (3) the original and replacement inflator model identifier(s), supplier(s), number of replacement inflators to be supplied, and number of vehicles remedied to date (overall and high absolute humidity region); (4) whether the current remedy(ies) in subpart (3) is an interim "like for like" remedy, which will require a subsequent recall/remedy program; and (5) if the answer to subpart (4) is yes, then the alternative[2] replacement inflator type(s), supplier(s), and number of alternative replacement inflators to be supplied. Please segregate your response by the inflator type installed in the motor vehicle as original equipment, using the table in **Appendix A** as a template. To the extent any of the data is based on a date other than the date of your response, please indicate the date on which the data was current. Please also describe the information on which you relied in calculating the figures for subpart (2).

2. Please explain how you will be able to trace the replacement inflators once the remedy has been completed - i.e., how you will be recording which replacement inflator (and from which supplier) was installed into which motor vehicle, and whether or not the barcode information for the remedy replacement is being recorded as part of this process. Are there specific requirements we should agree to set as to how every manufacturer will identify and trace replacement inflators? If so, what are your suggestions on those requirements?

3. Please explain what efforts you have taken, or you plan to take, to maximize recall completion rates (for both any interim remedy or alternative remedy program), whether by engaging with vehicle owners through new and/or traditional media, direct contacts with vehicle owners, and/or other innovative means of bringing consumer attention to the importance of completing the remedy? Please also include assessments of, and solutions for overcoming, consumer apathy and/or failure to respond to recall notices. For owners receiving an interim remedy inflator, please discuss your plans for educating owners while at the dealer about the need to return for a final remedy including collecting and storing additional consumer contact information.

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[2] For the purposes of these Requests, "alternative" replacement inflator refers to an inflator that is not a like for like replacement (A for A), but a replacement that differs from the current inflator (A for B).

B. Coordinated Remedy Program

In requesting public comment in the Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators, NHTSA posed a number of broad questions. *See* 80 FED. REG. 32197 (June 5, 2015). Below, NHTSA requests specific information from you in connection with these broad topics in order to facilitate a robust dialog in future meetings with the agency and other industry actors. Unless otherwise specified, we ask that your responses to these questions be specific to each inflator type you have recalled or have decided to recall (e.g., PSDI, PSDI-4, PSDI-4K, PSDI-5, PSPI, PSPI-L, SPI, etc.).

Topic 1: Whether, and how, NHTSA should order Takata and/or other regulated entities to source replacement parts for Manufacturers.

4. For each type of inflator you are recalling, please provide a list of Tier 1 air bag inflator supplier(s) from whom you are, or will be, obtaining replacement inflators. For each supplier you list, identify and describe the replacement inflators, including the chemistry of the main propellant, you have obtained or will be obtaining, and in what volumes, along with any known future or anticipated delivery date(s). Have you entered into any formalized agreement(s) for the supply of these parts?

5. To the extent that you have identified one or more potential Tier 1 air bag inflator suppliers, but have not yet formalized any agreement, please identify and describe the replacement inflators being discussed, as well as potential production volumes. Describe with as much specificity as possible the current status of those arrangements.

6. Have you reached out to any Tier 1 air bag inflator suppliers that have been unable or reluctant to produce replacement inflators for your company? If so, which inflator(s) and what reasons were you given for that inability or reluctance?

7. What challenges, if any, have you encountered, are you encountering, or do you expect to encounter in the future, in securing replacement inflators from any source, Takata or otherwise? How can NHTSA, Takata, other OEMs, or any other third party assist with any of the challenges?

Topic 2: Whether, and how, NHTSA should issue an accelerated remedy directive to Takata and/or some (or all) Manufacturers

8. For each inflator type you have recalled or will be recalling, when do you expect to have a sufficient number of replacement inflators to remedy all of your vehicles covered by the recall(s), regardless of geographic region? What is the basis for this date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

9. As to each inflator type you identified in question 8 above, please share a timeline for the production of replacement inflators for your vehicles, including: (i) the current status of the design, testing, and qualification of any alternative remedy parts; (ii) the first date on which each type of remedy inflator was, or will be, produced or manufactured, and the anticipated rate

of weekly production thereafter; and, (iii) the schedule on which the replacement inflators are being, or will be, distributed to dealers for use as remedy parts, designated by geographical region and/or state.

10. What steps have you taken, or do you plan to take in the future, to expedite the production of remedy parts from any source, Takata or otherwise?

11. What challenges, if any, do you expect that you would face, or that the industry as a whole would face, if NHTSA issued an accelerated remedy directive? How can NHTSA, Takata, other vehicle manufacturers, or any other third party assist in addressing these challenges?

Topic 3: Whether, and how, NHTSA should order Takata and/or Manufacturers to prioritize certain vehicles or certain regions in its allocation of replacement parts

12. What methods are you considering with respect to allocating replacement inflators throughout the United States? What plans have you made or steps have you taken regarding the allocation of replacement inflators to cover those vehicles that appear to be most at risk first - i.e., older vehicles and those currently registered in, or that have ever been registered in, areas of high absolute humidity? What process or method would you recommend for prioritizing vehicle populations for risk of inflator rupture (either for the vehicles you produced or for all affected/ recalled vehicles), what data should be used for this purpose, and who should be involved in this process (one or all OEMs, NHTSA, Takata, other tier-ones)?

13. When do you expect to have a sufficient number of replacement inflators to remedy vehicles subject to the recall(s) that are currently registered in, or that have ever been registered in, regions of high absolute humidity? What is the basis for date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

14. Are you contemplating any future recall, or other service, action(s) for vehicles that are not currently within the scope of the recall(s)? If so, what is the basis for any such action? Which makes, models, and model years would be included? When do you anticipate that you would commence any such action?

15. What, if any, obligations do you have, or can you anticipate having, in countries other than the United States to conduct remedy programs and/or provide replacement air bag inflators in relation to the recalled Takata air bag inflators? If any, how do you plan to address these multiple obligations?

Topic 4: Whether, and how, NHTSA should order a replacement schedule for replacement frontal inflator/air bags if Takata and/or Manufacturers cannot provide assurances for the ongoing safety of the inflators

16. To the extent that you are obtaining replacement inflators from Takata, please explain the steps you are taking to assure the safety of these replacement inflators.

17. What efforts have you taken, are you taking, or do you plan to take in the future to find or develop alternative remedy parts, including any plans to obtain parts from other suppliers or use Takata inflators not currently covered by Recall No. 15E-040. If so, what is the anticipated timeline for the development of the alternative remedy?

18. Please explain any testing of remedy parts that is being conducted by you or by any third party on your behalf.

19. Please identify, by make, model, and model year, every motor vehicle that you have produced that uses an ammonium nitrate-based propellant in any air bag inflator, which is not already covered by the recall(s). In the event that all or part of the population of these motor vehicles contains the same defective condition at issue in the current Takata air bag inflator recall(s), have you devised or contemplated any plan to address such a defect? If so, please explain that plan or contemplated plan.

20. Are you currently, or have you contemplated, conducting any parts surveillance or recovery actions for other types of Takata air bag inflators not currently covered by Recall No. 15E-040? If so, please explain what you have done, or are contemplated doing, and why.

Topic 5: Whether, and how, NHTSA should order additional authorized repair facilities, or any other regulated entity, to aid Takata and/or Manufacturers in timely completing remedy programs

21. Please explain the steps you have taken, or that you plan to take in the future and approximately when you plan to do so, to urge and/or incentivize your dealers and repair facilities to increase the number of motor vehicles remedied as it relates to the Takata air bag inflators.

22. Other than availability of replacement parts, what challenges and/or limitations, if any, have you encountered, are you encountering, or do you expect to encounter in the future, with respect to the capacity of your dealers and repair facilities to remedy vehicles brought in for service under the Recall(s) within a reasonable amount of time?

23. Is your company able to expand beyond its franchised dealer network in order to expand the number of authorized repair facilities able to perform inflator or module replacements? What types or levels of certification are required in your view for a technician to safely and properly apply the recall remedy? Do your franchise agreements, state laws, or other legal requirements eliminate or impede this option? Please explain in detail and identify how NHTSA could assist in reducing or eliminating these impediments.

Topic 6: Your Suggestions

24. Please feel free to share any constructive ideas on how NHTSA could most effectively coordinate, or assist in the coordination of, the prioritization, organization, and phasing of recall and remedy programs involving the defective Takata frontal air bag inflators.

25. Please feel free to elaborate on ideas and/or methods for ensuring that Vehicle Manufacturers and Takata achieve satisfactory (100%) recall/remedy completion rates.

26. Please provide any further direction, commentary, or information that you believe may be helpful or useful in this coordinated remedy proceeding.

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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 18, 2015

Mr. Donald Neff
Manager, Technical Compliance
Nissan North America, Inc.
One Nissan Way
Franklin, TN 37067

Dear Mr. Neff:

As you know, as part of the National Highway Traffic Safety Administration's (NHTSA) ongoing investigation of defective Takata air bag inflators, and NHTSA's oversight of the associated remedies, NHTSA has opened a Coordinated Remedy Program proceeding to facilitate and ensure, industry-wide, the adequate and appropriate remedy of affected vehicles. *See Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators*, 80 FED. REG. 32,197 (June 5, 2015). The risk of harm presented by the defective Takata air bag inflators transcends the scope of the usual Safety Act recall. Further, remedy programs individual to each Vehicle Manufacturer[1] creates a patch-work solution that NHTSA believes may not adequately address the safety risks presented by the defective inflators within a reasonable time. Thus, the Coordinated Remedy Program is a necessary step in achieving our shared safety goals, including that consumers in the United States have the protections they were promised and expect when it comes to the safe functioning of their vehicle air bags.

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June 18, 2015

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26. Please provide any further direction, commentary, or information that you believe may be helpful or useful in this coordinated remedy proceeding.

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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 18, 2015

Mr. Brian Latouf
Director, Field Product Investigations and Evaluations
General Motors LLC
30001 Van Dyke – Mail Code 480-210-2V
Warren, MI 48090-9055

Dear Mr. Latouf:

As you know, as part of the National Highway Traffic Safety Administration's (NHTSA) ongoing investigation of defective Takata air bag inflators, and NHTSA's oversight of the associated remedies, NHTSA has opened a Coordinated Remedy Program proceeding to facilitate and ensure, industry-wide, the adequate and appropriate remedy of affected vehicles. *See Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators*, 80 FED. REG. 32,197 (June 5, 2015). The risk of harm presented by the defective Takata air bag inflators transcends the scope of the usual Safety Act recall. Further, remedy programs individual to each Vehicle Manufacturer[1] creates a patch-work solution that NHTSA believes may not adequately address the safety risks presented by the defective inflators within a reasonable time. Thus, the Coordinated Remedy Program is a necessary step in achieving our shared safety goals, including that consumers in the United States have the protections they were promised and expect when it comes to the safe functioning of their vehicle air bags.

Through the Coordinated Remedy Program proceeding NHTSA seeks to promote a full, open, and collaborative process, without compromising NHTSA's objectives of safety, that facilitates thoughtful problem-solving and engages the affected Vehicle Manufacturers, Takata,[2]

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[2] TK Holdings, Inc.

and other Tier One Suppliers[3] in developing and implementing solutions to this significant safety risk. This process will develop solutions for the prioritization, organization, and phasing of remedy programs to appropriately address the multitude of factors contributing to the complexity of these recall programs. These factors include, but are not limited to, environmental factors (including air bag age), sourcing and production of replacements given the volume of parts required, urgency of timely vehicle remedies, allocation, delivery, installation, owner notification, and adequacy of the remedy (including subsequent replacement of certain initial replacement inflators). To be clear, through this process NHTSA seeks, and expects, timely 100% completion rates for the recall and remedy of defective Takata air bag inflators. Further, NHTSA hopes to inspire the creativity, energy, and problem-solving determination of each Vehicle Manufacturer and Tier One Supplier, and of Takata, in service to the American people and your customers.

Accordingly, NHTSA requests that you answer the attached questions truthfully and completely as a comment to Docket No. NHTSA-2015-0055. To be most helpful, NHTSA asks that you submit your responses within 21 days following receipt of this letter. As you will see, the questions posed largely track the questions for public comment set forth in our June 5, 2015 Federal Register notice and will facilitate robust dialog in future meetings with the agency. We are happy to work with you to address concerns you may have about confidentiality or issues otherwise related to the sharing of business information. There will be a public docket as well as a confidential docket to protect confidential information from public view. Requests for confidentiality of submissions to the docket can be made pursuant to the procedures set forth in 49 CFR Part 512.

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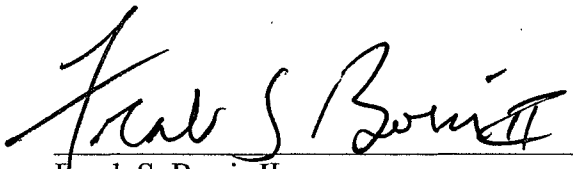
The staff at NHTSA look forward to working with you to solve this unprecedented challenge. Please feel free to contact us with questions or concerns about this request, or the Coordinated Remedy Program proceeding.



Frank S. Borris II
Acting Associate Administrator for Enforcement

Attachment: Coordinated Remedy Questions

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cc: Mr. Francis Dance, BMW of North America, LLC
Mr. Phil Hartnagel, Chrysler (FCA US LLC)
Mr. Andy Jones, Daimler Trucks North America LLC
Mr. Michael Scott, Daimler Vans USA, LLC
Mr. Todd Fronckowiak, Ford Motor Company
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Mr. Donald Neff, Nissan North America, Inc.
Mr. John Frooshani, Subaru of America, Inc.
Mr. Matthew D. Collins, Toyota Motor Engineering & Manufacturing North America, Inc.

June 18, 2015

ATTACHMENT: Coordinated Remedy Questions

A. General Recall Status

1. Please provide a spreadsheet with the most current information regarding the recall(s) of your motor vehicles with Takata air bag inflators, including, but not limited to: (1) the make, model, model year, and Takata inflator type (e.g., PSDI, PSPI, etc.) for each affected vehicle; (2) the total number of vehicles subject to the Recall(s), broken down by make, model, and model year, vehicles still in service, and vehicles ever registered in areas of high absolute humidity[1]; (3) the original and replacement inflator model identifier(s), supplier(s), number of replacement inflators to be supplied, and number of vehicles remedied to date (overall and high absolute humidity region); (4) whether the current remedy(ies) in subpart (3) is an interim "like for like" remedy, which will require a subsequent recall/remedy program; and (5) if the answer to subpart (4) is yes, then the alternative[2] replacement inflator type(s), supplier(s), and number of alternative replacement inflators to be supplied. Please segregate your response by the inflator type installed in the motor vehicle as original equipment, using the table in **Appendix A** as a template. To the extent any of the data is based on a date other than the date of your response, please indicate the date on which the data was current. Please also describe the information on which you relied in calculating the figures for subpart (2).

2. Please explain how you will be able to trace the replacement inflators once the remedy has been completed - i.e., how you will be recording which replacement inflator (and from which supplier) was installed into which motor vehicle, and whether or not the barcode information for the remedy replacement is being recorded as part of this process. Are there specific requirements we should agree to set as to how every manufacturer will identify and trace replacement inflators? If so, what are your suggestions on those requirements?

3. Please explain what efforts you have taken, or you plan to take, to maximize recall completion rates (for both any interim remedy or alternative remedy program), whether by engaging with vehicle owners through new and/or traditional media, direct contacts with vehicle owners, and/or other innovative means of bringing consumer attention to the importance of completing the remedy? Please also include assessments of, and solutions for overcoming, consumer apathy and/or failure to respond to recall notices. For owners receiving an interim remedy inflator, please discuss your plans for educating owners while at the dealer about the need to return for a final remedy including collecting and storing additional consumer contact information.

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[2] For the purposes of these Requests, "alternative" replacement inflator refers to an inflator that is not a like for like replacement (A for A), but a replacement that differs from the current inflator (A for B).

B. Coordinated Remedy Program

In requesting public comment in the Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators, NHTSA posed a number of broad questions. *See* 80 FED. REG. 32197 (June 5, 2015). Below, NHTSA requests specific information from you in connection with these broad topics in order to facilitate a robust dialog in future meetings with the agency and other industry actors. Unless otherwise specified, we ask that your responses to these questions be specific to each inflator type you have recalled or have decided to recall (e.g., PSDI, PSDI-4, PSDI-4K, PSDI-5, PSPI, PSPI-L, SPI, etc.).

Topic 1: Whether, and how, NHTSA should order Takata and/or other regulated entities to source replacement parts for Manufacturers.

4. For each type of inflator you are recalling, please provide a list of Tier 1 air bag inflator supplier(s) from whom you are, or will be, obtaining replacement inflators. For each supplier you list, identify and describe the replacement inflators, including the chemistry of the main propellant, you have obtained or will be obtaining, and in what volumes, along with any known future or anticipated delivery date(s). Have you entered into any formalized agreement(s) for the supply of these parts?

5. To the extent that you have identified one or more potential Tier 1 air bag inflator suppliers, but have not yet formalized any agreement, please identify and describe the replacement inflators being discussed, as well as potential production volumes. Describe with as much specificity as possible the current status of those arrangements.

6. Have you reached out to any Tier 1 air bag inflator suppliers that have been unable or reluctant to produce replacement inflators for your company? If so, which inflator(s) and what reasons were you given for that inability or reluctance?

7. What challenges, if any, have you encountered, are you encountering, or do you expect to encounter in the future, in securing replacement inflators from any source, Takata or otherwise? How can NHTSA, Takata, other OEMs, or any other third party assist with any of the challenges?

Topic 2: Whether, and how, NHTSA should issue an accelerated remedy directive to Takata and/or some (or all) Manufacturers

8. For each inflator type you have recalled or will be recalling, when do you expect to have a sufficient number of replacement inflators to remedy all of your vehicles covered by the recall(s), regardless of geographic region? What is the basis for this date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

9. As to each inflator type you identified in question 8 above, please share a timeline for the production of replacement inflators for your vehicles, including: (i) the current status of the design, testing, and qualification of any alternative remedy parts; (ii) the first date on which each type of remedy inflator was, or will be, produced or manufactured, and the anticipated rate

of weekly production thereafter; and, (iii) the schedule on which the replacement inflators are being, or will be, distributed to dealers for use as remedy parts, designated by geographical region and/or state.

10. What steps have you taken, or do you plan to take in the future, to expedite the production of remedy parts from any source, Takata or otherwise?

11. What challenges, if any, do you expect that you would face, or that the industry as a whole would face, if NHTSA issued an accelerated remedy directive? How can NHTSA, Takata, other vehicle manufacturers, or any other third party assist in addressing these challenges?

Topic 3: Whether, and how, NHTSA should order Takata and/or Manufacturers to prioritize certain vehicles or certain regions in its allocation of replacement parts

12. What methods are you considering with respect to allocating replacement inflators throughout the United States? What plans have you made or steps have you taken regarding the allocation of replacement inflators to cover those vehicles that appear to be most at risk first - i.e., older vehicles and those currently registered in, or that have ever been registered in, areas of high absolute humidity? What process or method would you recommend for prioritizing vehicle populations for risk of inflator rupture (either for the vehicles you produced or for all affected/ recalled vehicles), what data should be used for this purpose, and who should be involved in this process (one or all OEMs, NHTSA, Takata, other tier-ones)?

13. When do you expect to have a sufficient number of replacement inflators to remedy vehicles subject to the recall(s) that are currently registered in, or that have ever been registered in, regions of high absolute humidity? What is the basis for date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

14. Are you contemplating any future recall, or other service, action(s) for vehicles that are not currently within the scope of the recall(s)? If so, what is the basis for any such action? Which makes, models, and model years would be included? When do you anticipate that you would commence any such action?

15. What, if any, obligations do you have, or can you anticipate having, in countries other than the United States to conduct remedy programs and/or provide replacement air bag inflators in relation to the recalled Takata air bag inflators? If any, how do you plan to address these multiple obligations?

Topic 4: Whether, and how, NHTSA should order a replacement schedule for replacement frontal inflator/air bags if Takata and/or Manufacturers cannot provide assurances for the ongoing safety of the inflators

16. To the extent that you are obtaining replacement inflators from Takata, please explain the steps you are taking to assure the safety of these replacement inflators.

17. What efforts have you taken, are you taking, or do you plan to take in the future to find or develop alternative remedy parts, including any plans to obtain parts from other suppliers or use Takata inflators not currently covered by Recall No. 15E-040. If so, what is the anticipated timeline for the development of the alternative remedy?

18. Please explain any testing of remedy parts that is being conducted by you or by any third party on your behalf.

19. Please identify, by make, model, and model year, every motor vehicle that you have produced that uses an ammonium nitrate-based propellant in any air bag inflator, which is not already covered by the recall(s). In the event that all or part of the population of these motor vehicles contains the same defective condition at issue in the current Takata air bag inflator recall(s), have you devised or contemplated any plan to address such a defect? If so, please explain that plan or contemplated plan.

20. Are you currently, or have you contemplated, conducting any parts surveillance or recovery actions for other types of Takata air bag inflators not currently covered by Recall No. 15E-040? If so, please explain what you have done, or are contemplated doing, and why.

Topic 5: Whether, and how, NHTSA should order additional authorized repair facilities, or any other regulated entity, to aid Takata and/or Manufacturers in timely completing remedy programs

21. Please explain the steps you have taken, or that you plan to take in the future and approximately when you plan to do so, to urge and/or incentivize your dealers and repair facilities to increase the number of motor vehicles remedied as it relates to the Takata air bag inflators.

22. Other than availability of replacement parts, what challenges and/or limitations, if any, have you encountered, are you encountering, or do you expect to encounter in the future, with respect to the capacity of your dealers and repair facilities to remedy vehicles brought in for service under the Recall(s) within a reasonable amount of time?

23. Is your company able to expand beyond its franchised dealer network in order to expand the number of authorized repair facilities able to perform inflator or module replacements? What types or levels of certification are required in your view for a technician to safely and properly apply the recall remedy? Do your franchise agreements, state laws, or other legal requirements eliminate or impede this option? Please explain in detail and identify how NHTSA could assist in reducing or eliminating these impediments.

Topic 6: Your Suggestions

24. Please feel free to share any constructive ideas on how NHTSA could most effectively coordinate, or assist in the coordination of, the prioritization, organization, and phasing of recall and remedy programs involving the defective Takata frontal air bag inflators.

25. Please feel free to elaborate on ideas and/or methods for ensuring that Vehicle Manufacturers and Takata achieve satisfactory (100%) recall/remedy completion rates.

26. Please provide any further direction, commentary, or information that you believe may be helpful or useful in this coordinated remedy proceeding.

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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 19, 2015

Mr. Andy Jones
Daimler Trucks North America, LLC
4747 N. Channel Avenue
Portland, OR 97217

Dear Mr. Jones:

As you know, as part of the National Highway Traffic Safety Administration's (NHTSA) ongoing investigation of defective Takata air bag inflators, and NHTSA's oversight of the associated remedies, NHTSA has opened a Coordinated Remedy Program proceeding to facilitate and ensure, industry-wide, the adequate and appropriate remedy of affected vehicles. *See Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators*, 80 FED. REG. 32,197 (June 5, 2015). The risk of harm presented by the defective Takata air bag inflators transcends the scope of the usual Safety Act recall. Further, remedy programs individual to each Vehicle Manufacturer[1] creates a patch-work solution that NHTSA believes may not adequately address the safety risks presented by the defective inflators within a reasonable time. Thus, the Coordinated Remedy Program is a necessary step in achieving our shared safety goals, including that consumers in the United States have the protections they were promised and expect when it comes to the safe functioning of their vehicle air bags.

Through the Coordinated Remedy Program proceeding NHTSA seeks to promote a full, open, and collaborative process, without compromising NHTSA's objectives of safety, that facilitates thoughtful problem-solving and engages the affected Vehicle Manufacturers, Takata,[2]

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and other Tier One Suppliers[3] in developing and implementing solutions to this significant safety risk. This process will develop solutions for the prioritization, organization, and phasing of remedy programs to appropriately address the multitude of factors contributing to the complexity of these recall programs. These factors include, but are not limited to, environmental factors (including air bag age), sourcing and production of replacements given the volume of parts required, urgency of timely vehicle remedies, allocation, delivery, installation, owner notification, and adequacy of the remedy (including subsequent replacement of certain initial replacement inflators). To be clear, through this process NHTSA seeks, and expects, timely 100% completion rates for the recall and remedy of defective Takata air bag inflators. Further, NHTSA hopes to inspire the creativity, energy, and problem-solving determination of each Vehicle Manufacturer and Tier One Supplier, and of Takata, in service to the American people and your customers.

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Frank S. Borris II
Acting Associate Administrator for Enforcement

Attachment: Coordinated Remedy Questions

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June 18, 2015

ATTACHMENT: Coordinated Remedy Questions

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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 18, 2015

Mr. Michael Scott
Daimler Vans USA, LLC
8501 Palmetto Commerce Pkwy
Ladson, SC 29456

Dear Mr. Scott:

As you know, as part of the National Highway Traffic Safety Administration's (NHTSA) ongoing investigation of defective Takata air bag inflators, and NHTSA's oversight of the associated remedies, NHTSA has opened a Coordinated Remedy Program proceeding to facilitate and ensure, industry-wide, the adequate and appropriate remedy of affected vehicles. *See Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators*, 80 FED. REG. 32,197 (June 5, 2015). The risk of harm presented by the defective Takata air bag inflators transcends the scope of the usual Safety Act recall. Further, remedy programs individual to each Vehicle Manufacturer[1] creates a patch-work solution that NHTSA believes may not adequately address the safety risks presented by the defective inflators within a reasonable time. Thus, the Coordinated Remedy Program is a necessary step in achieving our shared safety goals, including that consumers in the United States have the protections they were promised and expect when it comes to the safe functioning of their vehicle air bags.

Through the Coordinated Remedy Program proceeding NHTSA seeks to promote a full, open, and collaborative process, without compromising NHTSA's objectives of safety, that facilitates thoughtful problem-solving and engages the affected Vehicle Manufacturers, Takata,[2]

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and other Tier One Suppliers[3] in developing and implementing solutions to this significant safety risk. This process will develop solutions for the prioritization, organization, and phasing of remedy programs to appropriately address the multitude of factors contributing to the complexity of these recall programs. These factors include, but are not limited to, environmental factors (including air bag age), sourcing and production of replacements given the volume of parts required, urgency of timely vehicle remedies, allocation, delivery, installation, owner notification, and adequacy of the remedy (including subsequent replacement of certain initial replacement inflators). To be clear, through this process NHTSA seeks, and expects, timely 100% completion rates for the recall and remedy of defective Takata air bag inflators. Further, NHTSA hopes to inspire the creativity, energy, and problem-solving determination of each Vehicle Manufacturer and Tier One Supplier, and of Takata, in service to the American people and your customers.

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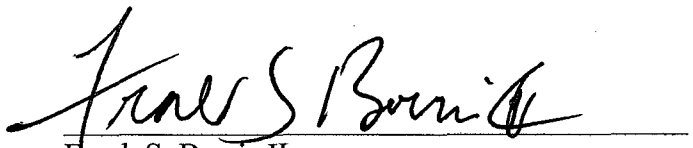

Frank S. Borris II
Acting Associate Administrator for Enforcement

Attachment: Coordinated Remedy Questions

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ATTACHMENT: Coordinated Remedy Questions

A. General Recall Status

1. Please provide a spreadsheet with the most current information regarding the recall(s) of your motor vehicles with Takata air bag inflators, including, but not limited to: (1) the make, model, model year, and Takata inflator type (e.g., PSDI, PSPI, etc.) for each affected vehicle; (2) the total number of vehicles subject to the Recall(s), broken down by make, model, and model year, vehicles still in service, and vehicles ever registered in areas of high absolute humidity[1]; (3) the original and replacement inflator model identifier(s), supplier(s), number of replacement inflators to be supplied, and number of vehicles remedied to date (overall and high absolute humidity region); (4) whether the current remedy(ies) in subpart (3) is an interim "like for like" remedy, which will require a subsequent recall/remedy program; and (5) if the answer to subpart (4) is yes, then the alternative[2] replacement inflator type(s), supplier(s), and number of alternative replacement inflators to be supplied. Please segregate your response by the inflator type installed in the motor vehicle as original equipment, using the table in **Appendix A** as a template. To the extent any of the data is based on a date other than the date of your response, please indicate the date on which the data was current. Please also describe the information on which you relied in calculating the figures for subpart (2).

2. Please explain how you will be able to trace the replacement inflators once the remedy has been completed - i.e., how you will be recording which replacement inflator (and from which supplier) was installed into which motor vehicle, and whether or not the barcode information for the remedy replacement is being recorded as part of this process. Are there specific requirements we should agree to set as to how every manufacturer will identify and trace replacement inflators? If so, what are your suggestions on those requirements?

3. Please explain what efforts you have taken, or you plan to take, to maximize recall completion rates (for both any interim remedy or alternative remedy program), whether by engaging with vehicle owners through new and/or traditional media, direct contacts with vehicle owners, and/or other innovative means of bringing consumer attention to the importance of completing the remedy? Please also include assessments of, and solutions for overcoming, consumer apathy and/or failure to respond to recall notices. For owners receiving an interim remedy inflator, please discuss your plans for educating owners while at the dealer about the need to return for a final remedy including collecting and storing additional consumer contact information.

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[1] For purposes of these Requests , NHTSA has assumed that "areas of high absolute humidity" include, at a minimum, the following states, territories, and geographic regions: Florida; Puerto Rico; Hawaii; Saipan; American Samoa; the U.S. Virgin Islands; Southern Georgia; and coastal areas of Alabama, Louisiana, Mississippi, and Texas. To the extent you have defined "areas of high absolute humidity" differently, please describe the region in your response to this Request.

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B. Coordinated Remedy Program

In requesting public comment in the Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators, NHTSA posed a number of broad questions. *See* 80 FED. REG. 32197 (June 5, 2015). Below, NHTSA requests specific information from you in connection with these broad topics in order to facilitate a robust dialog in future meetings with the agency and other industry actors. Unless otherwise specified, we ask that your responses to these questions be specific to each inflator type you have recalled or have decided to recall (e.g., PSDI, PSDI-4, PSDI-4K, PSDI-5, PSPI, PSPI-L, SPI, etc.).

Topic 1: Whether, and how, NHTSA should order Takata and/or other regulated entities to source replacement parts for Manufacturers.

4. For each type of inflator you are recalling, please provide a list of Tier 1 air bag inflator supplier(s) from whom you are, or will be, obtaining replacement inflators. For each supplier you list, identify and describe the replacement inflators, including the chemistry of the main propellant, you have obtained or will be obtaining, and in what volumes, along with any known future or anticipated delivery date(s). Have you entered into any formalized agreement(s) for the supply of these parts?

5. To the extent that you have identified one or more potential Tier 1 air bag inflator suppliers, but have not yet formalized any agreement, please identify and describe the replacement inflators being discussed, as well as potential production volumes. Describe with as much specificity as possible the current status of those arrangements.

6. Have you reached out to any Tier 1 air bag inflator suppliers that have been unable or reluctant to produce replacement inflators for your company? If so, which inflator(s) and what reasons were you given for that inability or reluctance?

7. What challenges, if any, have you encountered, are you encountering, or do you expect to encounter in the future, in securing replacement inflators from any source, Takata or otherwise? How can NHTSA, Takata, other OEMs, or any other third party assist with any of the challenges?

Topic 2: Whether, and how, NHTSA should issue an accelerated remedy directive to Takata and/or some (or all) Manufacturers

8. For each inflator type you have recalled or will be recalling, when do you expect to have a sufficient number of replacement inflators to remedy all of your vehicles covered by the recall(s), regardless of geographic region? What is the basis for this date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

9. As to each inflator type you identified in question 8 above, please share a timeline for the production of replacement inflators for your vehicles, including: (i) the current status of the design, testing, and qualification of any alternative remedy parts; (ii) the first date on which each type of remedy inflator was, or will be, produced or manufactured, and the anticipated rate

of weekly production thereafter; and, (iii) the schedule on which the replacement inflators are being, or will be, distributed to dealers for use as remedy parts, designated by geographical region and/or state.

10. What steps have you taken, or do you plan to take in the future, to expedite the production of remedy parts from any source, Takata or otherwise?

11. What challenges, if any, do you expect that you would face, or that the industry as a whole would face, if NHTSA issued an accelerated remedy directive? How can NHTSA, Takata, other vehicle manufacturers, or any other third party assist in addressing these challenges?

Topic 3: Whether, and how, NHTSA should order Takata and/or Manufacturers to prioritize certain vehicles or certain regions in its allocation of replacement parts

12. What methods are you considering with respect to allocating replacement inflators throughout the United States? What plans have you made or steps have you taken regarding the allocation of replacement inflators to cover those vehicles that appear to be most at risk first - i.e., older vehicles and those currently registered in, or that have ever been registered in, areas of high absolute humidity? What process or method would you recommend for prioritizing vehicle populations for risk of inflator rupture (either for the vehicles you produced or for all affected/ recalled vehicles), what data should be used for this purpose, and who should be involved in this process (one or all OEMs, NHTSA, Takata, other tier-ones)?

13. When do you expect to have a sufficient number of replacement inflators to remedy vehicles subject to the recall(s) that are currently registered in, or that have ever been registered in, regions of high absolute humidity? What is the basis for date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

14. Are you contemplating any future recall, or other service, action(s) for vehicles that are not currently within the scope of the recall(s)? If so, what is the basis for any such action? Which makes, models, and model years would be included? When do you anticipate that you would commence any such action?

15. What, if any, obligations do you have, or can you anticipate having, in countries other than the United States to conduct remedy programs and/or provide replacement air bag inflators in relation to the recalled Takata air bag inflators? If any, how do you plan to address these multiple obligations?

Topic 4: Whether, and how, NHTSA should order a replacement schedule for replacement frontal inflator/air bags if Takata and/or Manufacturers cannot provide assurances for the ongoing safety of the inflators

16. To the extent that you are obtaining replacement inflators from Takata, please explain the steps you are taking to assure the safety of these replacement inflators.

17. What efforts have you taken, are you taking, or do you plan to take in the future to find or develop alternative remedy parts, including any plans to obtain parts from other suppliers or use Takata inflators not currently covered by Recall No. 15E-040. If so, what is the anticipated timeline for the development of the alternative remedy?

18. Please explain any testing of remedy parts that is being conducted by you or by any third party on your behalf.

19. Please identify, by make, model, and model year, every motor vehicle that you have produced that uses an ammonium nitrate-based propellant in any air bag inflator, which is not already covered by the recall(s). In the event that all or part of the population of these motor vehicles contains the same defective condition at issue in the current Takata air bag inflator recall(s), have you devised or contemplated any plan to address such a defect? If so, please explain that plan or contemplated plan.

20. Are you currently, or have you contemplated, conducting any parts surveillance or recovery actions for other types of Takata air bag inflators not currently covered by Recall No. 15E-040? If so, please explain what you have done, or are contemplated doing, and why.

Topic 5: Whether, and how, NHTSA should order additional authorized repair facilities, or any other regulated entity, to aid Takata and/or Manufacturers in timely completing remedy programs

21. Please explain the steps you have taken, or that you plan to take in the future and approximately when you plan to do so, to urge and/or incentivize your dealers and repair facilities to increase the number of motor vehicles remedied as it relates to the Takata air bag inflators.

22. Other than availability of replacement parts, what challenges and/or limitations, if any, have you encountered, are you encountering, or do you expect to encounter in the future, with respect to the capacity of your dealers and repair facilities to remedy vehicles brought in for service under the Recall(s) within a reasonable amount of time?

23. Is your company able to expand beyond its franchised dealer network in order to expand the number of authorized repair facilities able to perform inflator or module replacements? What types or levels of certification are required in your view for a technician to safely and properly apply the recall remedy? Do your franchise agreements, state laws, or other legal requirements eliminate or impede this option? Please explain in detail and identify how NHTSA could assist in reducing or eliminating these impediments.

Topic 6: Your Suggestions

24. Please feel free to share any constructive ideas on how NHTSA could most effectively coordinate, or assist in the coordination of, the prioritization, organization, and phasing of recall and remedy programs involving the defective Takata frontal air bag inflators.

25. Please feel free to elaborate on ideas and/or methods for ensuring that Vehicle Manufacturers and Takata achieve satisfactory (100%) recall/remedy completion rates.

26. Please provide any further direction, commentary, or information that you believe may be helpful or useful in this coordinated remedy proceeding.

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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 18, 2015

Mr. John Turley
American Honda Motor Co.
1919 Torrance Blvd.
Torrance, CA 90501

Dear Mr. Turley:

As you know, as part of the National Highway Traffic Safety Administration's (NHTSA) ongoing investigation of defective Takata air bag inflators, and NHTSA's oversight of the associated remedies, NHTSA has opened a Coordinated Remedy Program proceeding to facilitate and ensure, industry-wide, the adequate and appropriate remedy of affected vehicles. *See Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators*, 80 FED. REG. 32,197 (June 5, 2015). The risk of harm presented by the defective Takata air bag inflators transcends the scope of the usual Safety Act recall. Further, remedy programs individual to each Vehicle Manufacturer[1] creates a patch-work solution that NHTSA believes may not adequately address the safety risks presented by the defective inflators within a reasonable time. Thus, the Coordinated Remedy Program is a necessary step in achieving our shared safety goals, including that consumers in the United States have the protections they were promised and expect when it comes to the safe functioning of their vehicle air bags.

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and other Tier One Suppliers[3] in developing and implementing solutions to this significant safety risk. This process will develop solutions for the prioritization, organization, and phasing of remedy programs to appropriately address the multitude of factors contributing to the complexity of these recall programs. These factors include, but are not limited to, environmental factors (including air bag age), sourcing and production of replacements given the volume of parts required, urgency of timely vehicle remedies, allocation, delivery, installation, owner notification, and adequacy of the remedy (including subsequent replacement of certain initial replacement inflators). To be clear, through this process NHTSA seeks, and expects, timely 100% completion rates for the recall and remedy of defective Takata air bag inflators. Further, NHTSA hopes to inspire the creativity, energy, and problem-solving determination of each Vehicle Manufacturer and Tier One Supplier, and of Takata, in service to the American people and your customers.

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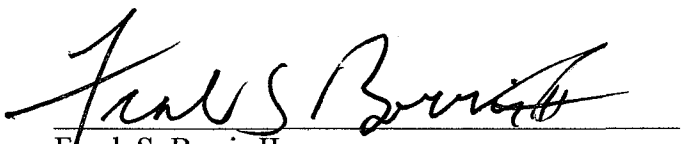

Frank S. Borris II
Acting Associate Administrator for Enforcement

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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 18, 2015

Mr. David Robertson
Group Manager, Environmental, Safety and
Powertrain Engineering
Mazda North American Operations
1025 Connecticut Avenue NW
Washington, DC 20036

Dear Mr. Robertson:

As you know, as part of the National Highway Traffic Safety Administration's (NHTSA) ongoing investigation of defective Takata air bag inflators, and NHTSA's oversight of the associated remedies, NHTSA has opened a Coordinated Remedy Program proceeding to facilitate and ensure, industry-wide, the adequate and appropriate remedy of affected vehicles. *See Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators*, 80 FED. REG. 32,197 (June 5, 2015). The risk of harm presented by the defective Takata air bag inflators transcends the scope of the usual Safety Act recall. Further, remedy programs individual to each Vehicle Manufacturer[1] creates a patch-work solution that NHTSA believes may not adequately address the safety risks presented by the defective inflators within a reasonable time. Thus, the Coordinated Remedy Program is a necessary step in achieving our shared safety goals, including that consumers in the United States have the protections they were promised and expect when it comes to the safe functioning of their vehicle air bags.

Through the Coordinated Remedy Program proceeding NHTSA seeks to promote a full, open, and collaborative process, without compromising NHTSA's objectives of safety, that facilitates thoughtful problem-solving and engages the affected Vehicle Manufacturers, Takata,[2]

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[1] To date, this includes: BMW of North America, LLC ("BMW"), Chrysler Group, LLC ("Chrysler"), Daimler Trucks North America, LLC ("DTNA"), Ford Motor Company ("Ford"), General Motors, LLC ("GM"), American Honda Motor Company ("Honda"), Mazda North American Operations ("Mazda"), Mitsubishi Motors North America, Inc. ("Mitsubishi"), Nissan North America, Inc. ("Nissan"), Subaru of America, Inc. ("Subaru"), and Toyota Motor Engineering and Manufacturing ("Toyota").

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and other Tier One Suppliers[3] in developing and implementing solutions to this significant safety risk. This process will develop solutions for the prioritization, organization, and phasing of remedy programs to appropriately address the multitude of factors contributing to the complexity of these recall programs. These factors include, but are not limited to, environmental factors (including air bag age), sourcing and production of replacements given the volume of parts required, urgency of timely vehicle remedies, allocation, delivery, installation, owner notification, and adequacy of the remedy (including subsequent replacement of certain initial replacement inflators). To be clear, through this process NHTSA seeks, and expects, timely 100% completion rates for the recall and remedy of defective Takata air bag inflators. Further, NHTSA hopes to inspire the creativity, energy, and problem-solving determination of each Vehicle Manufacturer and Tier One Supplier, and of Takata, in service to the American people and your customers.

Accordingly, NHTSA requests that you answer the attached questions truthfully and completely as a comment to Docket No. NHTSA-2015-0055. To be most helpful, NHTSA asks that you submit your responses within 21 days following receipt of this letter. As you will see, the questions posed largely track the questions for public comment set forth in our June 5, 2015 Federal Register notice and will facilitate robust dialog in future meetings with the agency. We are happy to work with you to address concerns you may have about confidentiality or issues otherwise related to the sharing of business information. There will be a public docket as well as a confidential docket to protect confidential information from public view. Requests for confidentiality of submissions to the docket can be made pursuant to the procedures set forth in 49 CFR Part 512.

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The staff at NHTSA look forward to working with you to solve this unprecedented challenge. Please feel free to contact us with questions or concerns about this request, or the Coordinated Remedy Program proceeding.

Frank S. Borris II
Acting Associate Administrator for Enforcement

Attachment: Coordinated Remedy Questions

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Mr. Michael Scott, Daimler Vans USA, LLC
Mr. Todd Fronckowiak, Ford Motor Company
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June 18, 2015

ATTACHMENT: Coordinated Remedy Questions

A. General Recall Status

1. Please provide a spreadsheet with the most current information regarding the recall(s) of your motor vehicles with Takata air bag inflators, including, but not limited to: (1) the make, model, model year, and Takata inflator type (e.g., PSDI, PSPI, etc.) for each affected vehicle; (2) the total number of vehicles subject to the Recall(s), broken down by make, model, and model year, vehicles still in service, and vehicles ever registered in areas of high absolute humidity[1]; (3) the original and replacement inflator model identifier(s), supplier(s), number of replacement inflators to be supplied, and number of vehicles remedied to date (overall and high absolute humidity region); (4) whether the current remedy(ies) in subpart (3) is an interim "like for like" remedy, which will require a subsequent recall/remedy program; and (5) if the answer to subpart (4) is yes, then the alternative[2] replacement inflator type(s), supplier(s), and number of alternative replacement inflators to be supplied. Please segregate your response by the inflator type installed in the motor vehicle as original equipment, using the table in **Appendix A** as a template. To the extent any of the data is based on a date other than the date of your response, please indicate the date on which the data was current. Please also describe the information on which you relied in calculating the figures for subpart (2).

2. Please explain how you will be able to trace the replacement inflators once the remedy has been completed - i.e., how you will be recording which replacement inflator (and from which supplier) was installed into which motor vehicle, and whether or not the barcode information for the remedy replacement is being recorded as part of this process. Are there specific requirements we should agree to set as to how every manufacturer will identify and trace replacement inflators? If so, what are your suggestions on those requirements?

3. Please explain what efforts you have taken, or you plan to take, to maximize recall completion rates (for both any interim remedy or alternative remedy program), whether by engaging with vehicle owners through new and/or traditional media, direct contacts with vehicle owners, and/or other innovative means of bringing consumer attention to the importance of completing the remedy? Please also include assessments of, and solutions for overcoming, consumer apathy and/or failure to respond to recall notices. For owners receiving an interim remedy inflator, please discuss your plans for educating owners while at the dealer about the need to return for a final remedy including collecting and storing additional consumer contact information.

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[2] For the purposes of these Requests, "alternative" replacement inflator refers to an inflator that is not a like for like replacement (A for A), but a replacement that differs from the current inflator (A for B).

B. Coordinated Remedy Program

In requesting public comment in the Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators, NHTSA posed a number of broad questions. *See* 80 FED. REG. 32197 (June 5, 2015). Below, NHTSA requests specific information from you in connection with these broad topics in order to facilitate a robust dialog in future meetings with the agency and other industry actors. Unless otherwise specified, we ask that your responses to these questions be specific to each inflator type you have recalled or have decided to recall (e.g., PSDI, PSDI-4, PSDI-4K, PSDI-5, PSPI, PSPI-L, SPI, etc.).

Topic 1: Whether, and how, NHTSA should order Takata and/or other regulated entities to source replacement parts for Manufacturers.

4. For each type of inflator you are recalling, please provide a list of Tier 1 air bag inflator supplier(s) from whom you are, or will be, obtaining replacement inflators. For each supplier you list, identify and describe the replacement inflators, including the chemistry of the main propellant, you have obtained or will be obtaining, and in what volumes, along with any known future or anticipated delivery date(s). Have you entered into any formalized agreement(s) for the supply of these parts?

5. To the extent that you have identified one or more potential Tier 1 air bag inflator suppliers, but have not yet formalized any agreement, please identify and describe the replacement inflators being discussed, as well as potential production volumes. Describe with as much specificity as possible the current status of those arrangements.

6. Have you reached out to any Tier 1 air bag inflator suppliers that have been unable or reluctant to produce replacement inflators for your company? If so, which inflator(s) and what reasons were you given for that inability or reluctance?

7. What challenges, if any, have you encountered, are you encountering, or do you expect to encounter in the future, in securing replacement inflators from any source, Takata or otherwise? How can NHTSA, Takata, other OEMs, or any other third party assist with any of the challenges?

Topic 2: Whether, and how, NHTSA should issue an accelerated remedy directive to Takata and/or some (or all) Manufacturers

8. For each inflator type you have recalled or will be recalling, when do you expect to have a sufficient number of replacement inflators to remedy all of your vehicles covered by the recall(s), regardless of geographic region? What is the basis for this date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

9. As to each inflator type you identified in question 8 above, please share a timeline for the production of replacement inflators for your vehicles, including: (i) the current status of the design, testing, and qualification of any alternative remedy parts; (ii) the first date on which each type of remedy inflator was, or will be, produced or manufactured, and the anticipated rate

of weekly production thereafter; and, (iii) the schedule on which the replacement inflators are being, or will be, distributed to dealers for use as remedy parts, designated by geographical region and/or state.

10. What steps have you taken, or do you plan to take in the future, to expedite the production of remedy parts from any source, Takata or otherwise?

11. What challenges, if any, do you expect that you would face, or that the industry as a whole would face, if NHTSA issued an accelerated remedy directive? How can NHTSA, Takata, other vehicle manufacturers, or any other third party assist in addressing these challenges?

Topic 3: Whether, and how, NHTSA should order Takata and/or Manufacturers to prioritize certain vehicles or certain regions in its allocation of replacement parts

12. What methods are you considering with respect to allocating replacement inflators throughout the United States? What plans have you made or steps have you taken regarding the allocation of replacement inflators to cover those vehicles that appear to be most at risk first - i.e., older vehicles and those currently registered in, or that have ever been registered in, areas of high absolute humidity? What process or method would you recommend for prioritizing vehicle populations for risk of inflator rupture (either for the vehicles you produced or for all affected/ recalled vehicles), what data should be used for this purpose, and who should be involved in this process (one or all OEMs, NHTSA, Takata, other tier-ones)?

13. When do you expect to have a sufficient number of replacement inflators to remedy vehicles subject to the recall(s) that are currently registered in, or that have ever been registered in, regions of high absolute humidity? What is the basis for date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

14. Are you contemplating any future recall, or other service, action(s) for vehicles that are not currently within the scope of the recall(s)? If so, what is the basis for any such action? Which makes, models, and model years would be included? When do you anticipate that you would commence any such action?

15. What, if any, obligations do you have, or can you anticipate having, in countries other than the United States to conduct remedy programs and/or provide replacement air bag inflators in relation to the recalled Takata air bag inflators? If any, how do you plan to address these multiple obligations?

Topic 4: Whether, and how, NHTSA should order a replacement schedule for replacement frontal inflator/air bags if Takata and/or Manufacturers cannot provide assurances for the ongoing safety of the inflators

16. To the extent that you are obtaining replacement inflators from Takata, please explain the steps you are taking to assure the safety of these replacement inflators.

17. What efforts have you taken, are you taking, or do you plan to take in the future to find or develop alternative remedy parts, including any plans to obtain parts from other suppliers or use Takata inflators not currently covered by Recall No. 15E-040. If so, what is the anticipated timeline for the development of the alternative remedy?

18. Please explain any testing of remedy parts that is being conducted by you or by any third party on your behalf.

19. Please identify, by make, model, and model year, every motor vehicle that you have produced that uses an ammonium nitrate-based propellant in any air bag inflator, which is not already covered by the recall(s). In the event that all or part of the population of these motor vehicles contains the same defective condition at issue in the current Takata air bag inflator recall(s), have you devised or contemplated any plan to address such a defect? If so, please explain that plan or contemplated plan.

20. Are you currently, or have you contemplated, conducting any parts surveillance or recovery actions for other types of Takata air bag inflators not currently covered by Recall No. 15E-040? If so, please explain what you have done, or are contemplated doing, and why.

Topic 5: Whether, and how, NHTSA should order additional authorized repair facilities, or any other regulated entity, to aid Takata and/or Manufacturers in timely completing remedy programs

21. Please explain the steps you have taken, or that you plan to take in the future and approximately when you plan to do so, to urge and/or incentivize your dealers and repair facilities to increase the number of motor vehicles remedied as it relates to the Takata air bag inflators.

22. Other than availability of replacement parts, what challenges and/or limitations, if any, have you encountered, are you encountering, or do you expect to encounter in the future, with respect to the capacity of your dealers and repair facilities to remedy vehicles brought in for service under the Recall(s) within a reasonable amount of time?

23. Is your company able to expand beyond its franchised dealer network in order to expand the number of authorized repair facilities able to perform inflator or module replacements? What types or levels of certification are required in your view for a technician to safely and properly apply the recall remedy? Do your franchise agreements, state laws, or other legal requirements eliminate or impede this option? Please explain in detail and identify how NHTSA could assist in reducing or eliminating these impediments.

Topic 6: Your Suggestions

24. Please feel free to share any constructive ideas on how NHTSA could most effectively coordinate, or assist in the coordination of, the prioritization, organization, and phasing of recall and remedy programs involving the defective Takata frontal air bag inflators.

25. Please feel free to elaborate on ideas and/or methods for ensuring that Vehicle Manufacturers and Takata achieve satisfactory (100%) recall/remedy completion rates.

26. Please provide any further direction, commentary, or information that you believe may be helpful or useful in this coordinated remedy proceeding.

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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 18, 2015

Mr. Kurt Kurata
Senior Manager, Product Support and Compliance
Mitsubishi Motors North America, Inc.
6400 Katella Avenue
Cypress, CA 90630

Dear Mr. Kurata:

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June 18, 2015

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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 18, 2015

Mr. John Frooshani
Safety Activities Manager, Government Relations
Subaru of America, Inc.
P.O. Box 6000
Cherry Hill, NJ 08034-6000

Dear Mr. Frooshani:

As you know, as part of the National Highway Traffic Safety Administration's (NHTSA) ongoing investigation of defective Takata air bag inflators, and NHTSA's oversight of the associated remedies, NHTSA has opened a Coordinated Remedy Program proceeding to facilitate and ensure, industry-wide, the adequate and appropriate remedy of affected vehicles. *See Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators*, 80 FED. REG. 32,197 (June 5, 2015). The risk of harm presented by the defective Takata air bag inflators transcends the scope of the usual Safety Act recall. Further, remedy programs individual to each Vehicle Manufacturer[1] creates a patch-work solution that NHTSA believes may not adequately address the safety risks presented by the defective inflators within a reasonable time. Thus, the Coordinated Remedy Program is a necessary step in achieving our shared safety goals, including that consumers in the United States have the protections they were promised and expect when it comes to the safe functioning of their vehicle air bags.

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and other Tier One Suppliers[3] in developing and implementing solutions to this significant safety risk. This process will develop solutions for the prioritization, organization, and phasing of remedy programs to appropriately address the multitude of factors contributing to the complexity of these recall programs. These factors include, but are not limited to, environmental factors (including air bag age), sourcing and production of replacements given the volume of parts required, urgency of timely vehicle remedies, allocation, delivery, installation, owner notification, and adequacy of the remedy (including subsequent replacement of certain initial replacement inflators). To be clear, through this process NHTSA seeks, and expects, timely 100% completion rates for the recall and remedy of defective Takata air bag inflators. Further, NHTSA hopes to inspire the creativity, energy, and problem-solving determination of each Vehicle Manufacturer and Tier One Supplier, and of Takata, in service to the American people and your customers.

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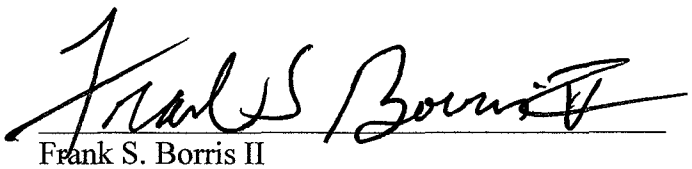
The staff at NHTSA look forward to working with you to solve this unprecedented challenge. Please feel free to contact us with questions or concerns about this request, or the Coordinated Remedy Program proceeding.



Frank S. Borris II
Acting Associate Administrator for Enforcement

Attachment: Coordinated Remedy Questions

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Mr. Matthew D. Collins, Toyota Motor Engineering & Manufacturing North America, Inc.

June 18, 2015

ATTACHMENT: Coordinated Remedy Questions

A. General Recall Status

1. Please provide a spreadsheet with the most current information regarding the recall(s) of your motor vehicles with Takata air bag inflators, including, but not limited to: (1) the make, model, model year, and Takata inflator type (e.g., PSDI, PSPI, etc.) for each affected vehicle; (2) the total number of vehicles subject to the Recall(s), broken down by make, model, and model year, vehicles still in service, and vehicles ever registered in areas of high absolute humidity[1]; (3) the original and replacement inflator model identifier(s), supplier(s), number of replacement inflators to be supplied, and number of vehicles remedied to date (overall and high absolute humidity region); (4) whether the current remedy(ies) in subpart (3) is an interim "like for like" remedy, which will require a subsequent recall/remedy program; and (5) if the answer to subpart (4) is yes, then the alternative[2] replacement inflator type(s), supplier(s), and number of alternative replacement inflators to be supplied. Please segregate your response by the inflator type installed in the motor vehicle as original equipment, using the table in **Appendix A** as a template. To the extent any of the data is based on a date other than the date of your response, please indicate the date on which the data was current. Please also describe the information on which you relied in calculating the figures for subpart (2).

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3. Please explain what efforts you have taken, or you plan to take, to maximize recall completion rates (for both any interim remedy or alternative remedy program), whether by engaging with vehicle owners through new and/or traditional media, direct contacts with vehicle owners, and/or other innovative means of bringing consumer attention to the importance of completing the remedy? Please also include assessments of, and solutions for overcoming, consumer apathy and/or failure to respond to recall notices. For owners receiving an interim remedy inflator, please discuss your plans for educating owners while at the dealer about the need to return for a final remedy including collecting and storing additional consumer contact information.

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Topic 1: Whether, and how, NHTSA should order Takata and/or other regulated entities to source replacement parts for Manufacturers.

4. For each type of inflator you are recalling, please provide a list of Tier 1 air bag inflator supplier(s) from whom you are, or will be, obtaining replacement inflators. For each supplier you list, identify and describe the replacement inflators, including the chemistry of the main propellant, you have obtained or will be obtaining, and in what volumes, along with any known future or anticipated delivery date(s). Have you entered into any formalized agreement(s) for the supply of these parts?

5. To the extent that you have identified one or more potential Tier 1 air bag inflator suppliers, but have not yet formalized any agreement, please identify and describe the replacement inflators being discussed, as well as potential production volumes. Describe with as much specificity as possible the current status of those arrangements.

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7. What challenges, if any, have you encountered, are you encountering, or do you expect to encounter in the future, in securing replacement inflators from any source, Takata or otherwise? How can NHTSA, Takata, other OEMs, or any other third party assist with any of the challenges?

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8. For each inflator type you have recalled or will be recalling, when do you expect to have a sufficient number of replacement inflators to remedy all of your vehicles covered by the recall(s), regardless of geographic region? What is the basis for this date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

9. As to each inflator type you identified in question 8 above, please share a timeline for the production of replacement inflators for your vehicles, including: (i) the current status of the design, testing, and qualification of any alternative remedy parts; (ii) the first date on which each type of remedy inflator was, or will be, produced or manufactured, and the anticipated rate

of weekly production thereafter; and, (iii) the schedule on which the replacement inflators are being, or will be, distributed to dealers for use as remedy parts, designated by geographical region and/or state.

10. What steps have you taken, or do you plan to take in the future, to expedite the production of remedy parts from any source, Takata or otherwise?

11. What challenges, if any, do you expect that you would face, or that the industry as a whole would face, if NHTSA issued an accelerated remedy directive? How can NHTSA, Takata, other vehicle manufacturers, or any other third party assist in addressing these challenges?

Topic 3: Whether, and how, NHTSA should order Takata and/or Manufacturers to prioritize certain vehicles or certain regions in its allocation of replacement parts

12. What methods are you considering with respect to allocating replacement inflators throughout the United States? What plans have you made or steps have you taken regarding the allocation of replacement inflators to cover those vehicles that appear to be most at risk first - i.e., older vehicles and those currently registered in, or that have ever been registered in, areas of high absolute humidity? What process or method would you recommend for prioritizing vehicle populations for risk of inflator rupture (either for the vehicles you produced or for all affected/ recalled vehicles), what data should be used for this purpose, and who should be involved in this process (one or all OEMs, NHTSA, Takata, other tier-ones)?

13. When do you expect to have a sufficient number of replacement inflators to remedy vehicles subject to the recall(s) that are currently registered in, or that have ever been registered in, regions of high absolute humidity? What is the basis for date? Is that projection limited to interim "like for like" remedy parts or does it include alternatives?

14. Are you contemplating any future recall, or other service, action(s) for vehicles that are not currently within the scope of the recall(s)? If so, what is the basis for any such action? Which makes, models, and model years would be included? When do you anticipate that you would commence any such action?

15. What, if any, obligations do you have, or can you anticipate having, in countries other than the United States to conduct remedy programs and/or provide replacement air bag inflators in relation to the recalled Takata air bag inflators? If any, how do you plan to address these multiple obligations?

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16. To the extent that you are obtaining replacement inflators from Takata, please explain the steps you are taking to assure the safety of these replacement inflators.

17. What efforts have you taken, are you taking, or do you plan to take in the future to find or develop alternative remedy parts, including any plans to obtain parts from other suppliers or use Takata inflators not currently covered by Recall No. 15E-040. If so, what is the anticipated timeline for the development of the alternative remedy?

18. Please explain any testing of remedy parts that is being conducted by you or by any third party on your behalf.

19. Please identify, by make, model, and model year, every motor vehicle that you have produced that uses an ammonium nitrate-based propellant in any air bag inflator, which is not already covered by the recall(s). In the event that all or part of the population of these motor vehicles contains the same defective condition at issue in the current Takata air bag inflator recall(s), have you devised or contemplated any plan to address such a defect? If so, please explain that plan or contemplated plan.

20. Are you currently, or have you contemplated, conducting any parts surveillance or recovery actions for other types of Takata air bag inflators not currently covered by Recall No. 15E-040? If so, please explain what you have done, or are contemplated doing, and why.

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21. Please explain the steps you have taken, or that you plan to take in the future and approximately when you plan to do so, to urge and/or incentivize your dealers and repair facilities to increase the number of motor vehicles remedied as it relates to the Takata air bag inflators.

22. Other than availability of replacement parts, what challenges and/or limitations, if any, have you encountered, are you encountering, or do you expect to encounter in the future, with respect to the capacity of your dealers and repair facilities to remedy vehicles brought in for service under the Recall(s) within a reasonable amount of time?

23. Is your company able to expand beyond its franchised dealer network in order to expand the number of authorized repair facilities able to perform inflator or module replacements? What types or levels of certification are required in your view for a technician to safely and properly apply the recall remedy? Do your franchise agreements, state laws, or other legal requirements eliminate or impede this option? Please explain in detail and identify how NHTSA could assist in reducing or eliminating these impediments.

Topic 6: Your Suggestions

24. Please feel free to share any constructive ideas on how NHTSA could most effectively coordinate, or assist in the coordination of, the prioritization, organization, and phasing of recall and remedy programs involving the defective Takata frontal air bag inflators.

25. Please feel free to elaborate on ideas and/or methods for ensuring that Vehicle Manufacturers and Takata achieve satisfactory (100%) recall/remedy completion rates.

26. Please provide any further direction, commentary, or information that you believe may be helpful or useful in this coordinated remedy proceeding.

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

1200 New Jersey Avenue SE.
Washington, DC 20590

June 18, 2015

Mr. Matthew D. Collins
Manager
Toyota Motor Engineering & Manufacturing
Mail Code: S-104
19001 South Western Avenue
Torrance, CA 90501

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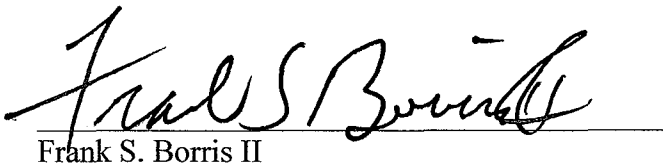

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FOR U.S. VEHICLES ONLY: Provide the following information for each unique make, model, model year, and inflator type subject to an existing Takata related NHTSA safety recall. The number of vehicles currently registered is determined by Polk, Experian, or other registration data provider. See comments in cells for further info on each field. Leave no cells blanks.

Date:
Number of Rows:

Submitted by:

	Recall ID	Make	Model	Model Year	Inflator Type	# Vehicles Produced	# Currently Registered	# Repaired with 'like for like' inflator	# Repaired with alternate design inflator
1	15V999	Rolls	Canardly	2002	PSPI	3,325	2,875	176	25
2	15V999	Rolls	Canardly	2003	PSPI	2,958	2,643	115	0
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									

FOR U.S. VEHICLES ONLY: For model year 2000 and later production, provide the following information for each unique, non-recalled make, model, and model year vehicle produced with an air bag module supplied by/sourced from Takata. See comments in cells for further info on each field. Leave no cells blanks.

Date:

Number of Rows:

Submitted by:

	Make	Model	Model Year (>= 2000)	Module Position	Inflator Type	# Vehicles Produced
1	Rolls	Canardly	2005	Driver	PSDI-5	3,125
2	Rolls	Canardly	2005	Passenger	UNKN	3,125
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						

FOR U.S. RECALLS ONLY: Provide the following information for each recall remedy repair kit part number purchased or sourced from Takata. See comments in cells for further info on each field. Leave no cells blanks.

Date:
Number of Rows:

Submitted by:

	Remedy Kit Part No.	Recall ID	Driver/ Passenger	Vehicle Application(s)	Inflator Supplier	Service Use	Number Purchased/ Ordered	Number Produced/ Delivered
1	REMREP-1234	15V123	Driver	MY 2002-2006 Rolls Canardly	Takata	No	8,967	8,967
2	REMREP-1234-TRW	15V124	Driver	MY 2002-2006 Rolls Canardly	TRW	Yes	2,500	1,500
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								

FOR U.S. MODULES ONLY: Provide the following information for all frontal air bag modules (consisting of inflator, cushion, and housing/cover) the company purchased (sourced) from Takata starting from model year 2000 to present whether purchased for production or service (non-recall) intended usage. See comments in cells for further info on each field. Leave no cells blanks.

Date:

Number of Rows:

Submitted by:

	OEM Part No.	Driver/ Passenger	Vehicle Application(s)	Production Use	Service Use	Number Purchased
1	ABCD-1234-efg5	Driver	MY 2002-2006 Rolls Canardly	Yes	No	12,231
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						

FOR NON-U.S. MODULES ONLY: Provide the following information for all frontal air bag modules (consisting of inflator, cushion, and housing/cover) the company purchased (sourced) from Takata starting from model year 2000 to present whether purchased for production or service (non-recall) intended usage. See comments in cells for further info on each field. Leave no cells blanks.

Date:

Number of Rows:

Submitted by:

	OEM Part No.	Market(s) Destined For	Driver/ Passenger	Vehicle Application(s)	Recall Action	Number Purchased
1	ABCD-1234-efg5	European	Driver	MY 2002-2006 Rolls Canardly	No	12,231
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						