

NISSAN

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July 10, 2015

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

PE15-019 RVH

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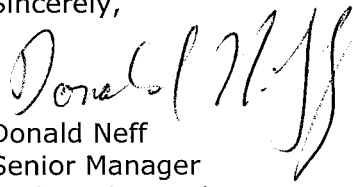
Re: [REDACTED]; NVS-213ps

Dear Mr. Quandt,

Enclosed is Nissan's response to the referenced NHTSA Information Request of May 20, 2015 concerning the Agency's investigation of allegations involving front suspension coil spring fracture in MY2008 through 2010 Nissan Versa vehicles.

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

Sincerely,


Donald Neff
Senior Manager
Technical Compliance

Enclosures

Response to

PE15-019

INTRODUCTION

In responding to this Information Request ("IR"), information has been obtained from those places within Nissan likely to contain such information in the regular and ordinary course of business. When a particular Request seeks "documents" as defined in the IR, reasonable, good faith searches have also been made of corporate records that are likely to contain responsive information in those places where such records are likely to be found. We have not checked such documents as "calendars", "appointment books", "financial statements" and "personnel records" even though they are included in the definition of "documents" because such documents would not contain owner complaints, field reports, technical analyses or other information sought by Request 2 pertaining to the alleged defect. We have also searched for responsive documents and information only with respect to vehicles manufactured for sale in the United States, which we understand to be the scope for which the IR seeks information. Nissan has searched for and produced records that were created up to and on the date the IR was released, May 20, 2015.

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

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

Nissan believes NHTSA's policy is to protect the privacy of individuals under exemption 6 of the Freedom of Information Act, 5 U.S.C. Section 552(b)(6). We understand that name, address, and other personal information of owners or other individuals, including Nissan personnel, contained in any of the attachments in this response will not be made available

to the public. Therefore, Nissan is not requesting confidential treatment for this information pursuant to 49 CFR, Part 512, but we believe any private information concerning individuals should not be made public.

* * * * *

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

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Table 1. Production Data Summary

MODEL	MODEL YEAR	UNITS
VERSA	2007	81,823
VERSA	2008	77,120
VERSA	2009	106,240
VERSA	2010	77,686
VERSA	2011	97,810

The information requested in 1.a through 1.g is provided, when known, in a Microsoft Access table titled "PE15-019_PRODUCTION_DATA" on a DVD enclosed as Attachment A.

2. State, by model year and failure mode, the number of each of the following, received by Nissan, or of which Nissan is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:
 - a. Consumer complaints (with customers verbatim), including those from fleet operators;

400 complaints from Nissan's Consumer Affairs database, representing 356 unique VIN's.

Table 2. Consumer Complaint Summary

MODEL	MODEL YEAR	Failure Mode 1	Failure Mode 2	Failure Mode 3	Failure Mode 4	Failure Mode 5	Tire Damage (Air Loss not Defined)
VERSA	2007	34	0	6	0	0	5
VERSA	2008	34	1	10	1	0	4
VERSA	2009	168	4	37	0	0	6
VERSA	2010	37	0	10	0	0	3

MODEL	MODEL YEAR	Failure Mode 1	Failure Mode 2	Failure Mode 3	Failure Mode 4	Failure Mode 5	Tire Damage (Air Loss not Defined)
VERSA	2011	32	2	5	0	0	1

b. Field reports, including dealer field reports;

9 Field Reports representing 9 unique VINs

3 Dealer Field Reports representing 3 unique VINs

0 Incident Investigation Reports

Table 3. Field Reports Summary

MODEL	MODEL YEAR	Failure Mode 1	Failure Mode 2	Failure Mode 3	Failure Mode 4	Failure Mode 5
VERSA	2007	4	0	0	0	0
VERSA	2008	1	0	0	0	0
VERSA	2009	4	0	3	0	0
VERSA	2010	0	0	0	0	0
VERSA	2011	0	0	0	0	0

c. Reports involving a crash, injury, or fatality;

There are no reports of crash, injury or fatality responsive to the inquiry.

Table 4. Crash, Injury, Fatality Reports Summary

MODEL	MODEL YEAR	Reported Crash	Reported Injury	Reported Fatality
VERSA	2007	0	0	0
VERSA	2008	0	0	0
VERSA	2009	0	0	0
VERSA	2010	0	0	0
VERSA	2011	0	0	0

d. Property damage claims;

There are no reports of property damage claims responsive to this inquiry.

Table 5. Property Damage Claims Summary

MODEL	MODEL YEAR	Property Damage Claims
VERSA	2007	0
VERSA	2008	0
VERSA	2009	0
VERSA	2010	0
VERSA	2011	0

- e. Third-party arbitration proceedings where Nissan is or was a party to the arbitration; and

There are no third party arbitration proceedings where Nissan is or was a party to the arbitration.

Table 6. Third Party Arbitration Proceedings Summary

MODEL	MODEL YEAR	Third Party Arbitration Proceedings
VERSA	2007	0
VERSA	2008	0
VERSA	2009	0
VERSA	2010	0
VERSA	2011	0

- f. Lawsuits, both pending and closed, in which Nissan is or was a defendant or codefendant.

There are no lawsuits, pending or closed, in which Nissan is or was a defendant or co-defendant.

Table 7. Lawsuits Summary

MODEL	MODEL YEAR	Lawsuits
VERSA	2007	0
VERSA	2008	0
VERSA	2009	0
VERSA	2010	0
VERSA	2011	0

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

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

The answers given to Request Number Two above were gathered from Nissan's data and are current as of May 20, 2015.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No.2, state the following information:
- a. Nissan's file number or other identifier used;
 - b. The category of the item, as identified in Request No.2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Subject failure mode;
 - j. Whether a crash is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

The information requested in 3.a through 3.m is provided, when known, in a Microsoft Access database titled "PE15-019_REQUEST_NUMBER_TWO_DATA" on a CD enclosed as Attachment A.

4. Produce copies of all documents related to each item within the scope of Request No.2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Nissan used for organizing the documents.

Documents within the scope of Request No. 2 are on a CD enclosed as Attachment A. The documents are organized by category.

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

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

- a. Nissan's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. Vehicle's VIN;
- d. Vehicle's model and model year;
- e. Repair date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- h. Labor operation number;
- i. Problem code;
- j. Replacement part number(s) and description(s);
- k. Subject failure mode;
- l. Concern stated by customer;
- m. Diagnostic trouble code(s) identified during the repair;
- n. Cause and Correction stated by dealer/technician; and
- o. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Table 8. Warranty Data Summary

MODEL	MODEL YEAR	Failure Mode 1	Failure Mode 2	Failure Mode 3	Failure Mode 4	Failure Mode 5	Tire Damage (Air Loss not Defined)
VERSA	2007	101	1	7	2	0	2
VERSA	2008	88	3	4	0	0	5
VERSA	2009	437	14	23	2	0	7
VERSA	2010	125	9	6	1	1	3
VERSA	2011	164	7	9	0	1	0

The information requested in 5.a through 5.o is provided, when known, in a Microsoft Access table titled "PE15-019_WARRANTY_DATA" on a DVD enclosed as Attachment A.

The warranty claims shown in Table 8 above and the attached data table may be over-inclusive. In the interest of transparency, Nissan has included these claims even if there is not enough information to be certain the claim is responsive.

6. Describe in detail the search criteria used by Nissan to identify the claims identified in response to Request No.5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Nissan on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Nissan offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty. Indicate which extended service plans provide coverage for the subject component.

The search criteria used by Nissan to identify the claims identified in response to Request No. 5 are set forth in Attachment B. Descriptions of each labor operation code, problem code, and part number are given in the Warranty Data table included on a DVD in Attachment A and labeled "PE15-019_WARRANTY_DATA".

The requested new vehicle warranty coverage documents are on a DVD enclosed as Attachment C.

Table 9. Extended Warranty Summary

MODEL	MODEL YEAR	OPTION				
		BRONZE	GOLD	GOLD PREFERRED	SILVER	SILVER PREFERRED
		VEHICLES COVERED				
VERSA	2007	502	5,761	22,759	616	800
VERSA	2008	473	4,423	19,595	462	518
VERSA	2009	405	5,053	24,215	391	501
VERSA	2010	240	2,710	12,326	153	251
VERSA	2011	343	3,926	18,898	197	447
	COVERAGE	Up to 8 years and 120,000 miles				

7. Produce copies of all service, warranty, and other documents that relate to the subject component in the subject and peer vehicles, that Nissan has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Nissan is planning to issue within the next 120 days. For each such document, including the subject bulletin, explain the reason for the communication and whether the issue addressed is, or may be, related to the alleged defect in anyway.

The requested dealer communications and service bulletin documents are on a DVD enclosed as Attachment D.

Nissan is not currently planning any communication to issue within the next 120 days.

8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject and peer vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Nissan. For each such action, provide the following information:
- Action title or identifier;
 - The actual or planned start date;
 - The actual or expected end date;
 - Brief summary of the subject and objective of the action;
 - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and

- f. A brief summary of the findings and/or conclusions resulting from the action.

The response to this request should include a detailed description of all past, present and future actions or interactions by any and all engineering working groups (e.g., vehicle dynamics, comfort and convenience) of which Nissan is aware. This includes, at a minimum, all of the information requested in items "a" through "f."

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

The information requested in 8.a through 8.f is provided, when known, in a file titled "PE15-019_LIST_OF_ACTIONS.pdf" and is enclosed in Confidential Attachment E. Copies of the documents related to the actions are also attached in Confidential Attachment E in a file titled "PE15-019_REQUEST_8_RESPONSE.pdf".

9. Describe all modifications or changes made by, or on behalf of, Nissan in the design, material composition, manufacture, quality control, supply, or installation of the subject component or subject system, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part number(s) (service and engineering) of the original component;
 - e. The part number(s) (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/ or sale, and if so, when;
 - g. When the modified component was made available as a service component.

Also, provide the above information for any modification or change that Nissan is aware of which may be incorporated into vehicle production within the next 120 days.

The information requested in 9.a through 9.g is provided, when known, in a file titled "PE15-019_REQUEST_9_RESPONSE.pdf" and is enclosed in Confidential Attachment F. Nissan is not aware of any modifications or changes to be incorporated into vehicle production within the next 120 days.

10. State the number of subject components that Nissan has sold for use in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cutoff date for sales, if applicable).

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Nissan is aware that contain the identical

component, whether installed in production or in service, and state the applicable dates of production or service usage.

The information requested in question 10 is provided, when known, in a file titled "PE15-019_REQUEST_10_RESPONSE.pdf" and is enclosed in Confidential Attachment G.

11. Provide the following information regarding the subject system and subject component in the subject vehicles:

- a. Provide front, top and side view CAD drawings showing the wheel, tire, coil spring, strut, brake line orientation with no steering angle and static/curb suspension travel for both the left and right side front suspension assemblies;
- b. Describe and provide copies of all documents related to all studies done to identify the range of locations, and most common locations, of spring fracture for both left and right side springs;
- c. Describe the transient effects on vehicle direction from a fractured spring while driving in the following conditions: 1) straight at highway speeds; and 2) outboard side spring fracture in a curve;
- d. Describe the conditions necessary for a fractured coil spring to interact with the tire on the left or right front side to produce: 1) a sudden puncture; and 2) rub through the sidewall gradually;
- e. Describe the driving conditions under which the conditions described in 11.d are possible;
- f. Describe the transient effects on vehicle direction from a sudden tire puncture by a fractured spring in the following conditions: 1) straight at highway speeds; and 2) outboard side spring fracture in a curve;
- g. Describe the changes in vehicle handling from normal system operation to operation with broken spring and punctured tire, e.g., understeer gradient (ISO 4138) and lateral transient response (ISO 7401);
- h. Describe the conditions necessary for a fractured coil spring to cause a brake line failure on the left or right front side; and
- i. Describe the driving conditions under which the conditions described in 11.h are possible.

The information requested in 11.a is provided in a file titled "PE15-019_REQUEST_11_RESPONSE.pdf" and is enclosed in Confidential Attachment H.

Nissan, to-date, has not conducted any analysis or investigation responsive to questions 11.b through 11.i. However, with respect to question 11.f, Nissan conducted extensive testing without a fractured front coil spring; that information is enclosed in Confidential Attachment E as part of Nissan's response to question number 8 (reference: ACTIONS pages 505-564) and is included here again in a file titled "PE15-019_REQUEST_11_RESPONSE.pdf" enclosed in Confidential Attachment H.

12. Furnish Nissan's assessment of the alleged defect in the subject vehicle, including:

- a. The root cause and contributory factor(s);
- b. The failure mechanism(s);

- c. The actual (if applicable) and statistically estimated failure rates for both left and right side springs at 3, 6 and 10 years in service;
- d. The likelihood of each of the subject failure modes for both left and right side springs (express in terms of per 100 spring fractures);
- e. The risk to motor vehicle safety posed by each of the subject failure modes;
- f. What warnings, if any, the operator would have that the alleged defect was occurring or subject component was malfunctioning; and
- g. The complaints referenced in this information request letter.

Nissan does not believe this issue poses an unreasonable risk to motor vehicle safety.

With respect to root cause, Nissan believes some coil springs manufactured prior to May of 2011¹ may have received inadequate phosphorous coating, or may have low residual stress in the coil springs or a combination of both mechanisms. In extreme cases, the inadequate coating condition could lead to crack initiation. More specifically, coil to coil contact when the spring is compressed could lead to surface imperfections in the coils thereby potentially initiating a crack. Subsequently, in areas where there is extensive use of road salt for snow and ice control, the road salt could then come in direct contact with the imperfections on the coil spring and, over time, could result in crack propagation in the spring. In rare instances spring breakage could occur.

With respect to incident rate, during a previous internal investigation, Nissan determined the incident rate for broken coil springs to be 0.11%. The incident rate for broken spring contact with the tire was considerably smaller at 0.01%.

In addition to incident rate analysis, Nissan comprehensively analyzed and tested how a potential rapid tire deflation affected the subject vehicle safety. Through this testing, Nissan determined that prior to any contact with the tire a fully fractured spring would result in a noticeable difference in the posture of the vehicle as well as audible noise to warn the operator of the issue. Nissan's testing also demonstrated that in the event of a tire puncture, the driver could maintain vehicle control during turning and braking and could bring the vehicle to a safe, controlled stop. This testing consisted of 12 test conditions while both driving straight and during cornering on a 40 meter radius. Even the most severe condition tested (cornering at 55 kph, lateral acceleration = 6 m/s^2 , and brake acceleration = 6 m/s^2) allowed the driver sufficient time to correct vehicle velocity and bring the vehicle to a controlled, safe stop. This testing is consistent with the fact that flat tires are a relatively common occurrence with which drivers can safely cope. As a result of the extremely low incident rate involving tire damage (0.01%), the extensive safety testing conducted, ample warning, the customer's ability to detect the condition, and given that there were no reports of a crash, injury or fatality as a result of this issue, Nissan previously determined that there was no unreasonable risk to vehicle safety.

Nissan's more recent incident rate analysis, performed in response to this IR, indicates an overall incident rate slightly higher at 0.34%. This most recent incident rate assessment is calculated based on warranty, consumer complaints, field reports, VOQs, and includes duplicate VINs. The incident rate for unique VINs is 0.29%. Tire damage incidents make up a small percentage (14%) of all claims and have an incident rate of **0.05%**. Incidents involving brake line damage (typically pinching of the line) are even less likely at 0.5% of all claims, corresponding to an incident rate of 0.0018%.

¹ A temporary production improvement was implemented in January of 2011, and a permanent production improvement was applied in May 2011.

As noted in response to question 2, there are no reports involving a crash, injury or fatality. Furthermore, there are no property damage claims, no third-party arbitration proceedings where Nissan is or was a party to the arbitration; and finally, no lawsuits, pending or closed, in which Nissan is or was a defendant or codefendant.

Review of Nissan's consumer complaints, field reports and warranty data shows a number of complaints supporting the previous test results which indicated the customer could detect the issue from an audible noise or a noticeable difference in vehicle posture. In some cases that did not include commentary from the customer concerning an audible noise or change in vehicle posture, the customer was alerted to a front coil spring fracture only after Nissan Dealership personnel advised them of the issue, indicating that the vehicle can be normally operated even if the subject condition occurs. Similarly, some reports do not indicate a noise or change in posture but do indicate both front springs were fractured or that there was corrosion on the fracture surface; this may indicate that one, or both, springs had been fractured for some time without the operator noticing any appreciable difference in vehicle behavior. Nevertheless, Nissan's testing indicates a fully fractured spring would result in a noticeable difference in the posture of the vehicle as well as an audible noise to warn the operator of the issue.

Nissan notes that its assessment of the issue is consistent with NHTSA's past analyses of similar issues, including by way of example, EA08-026. In that instance, ODI reached the same conclusion as Nissan in explaining that a front suspension coil spring fracture itself has little safety consequence and commented on the number of drivers who were unaware of the failure condition for some time. NHTSA also noted in the closing of EA08-026, among others (EA08-018), the low likelihood of tire punctures and the lack of severe crashes, deaths or injuries, as is the case in this here. In this instance, all the same factors – incident rate, tire puncture likelihood, and a lack of crash events are all similar to – and in some cases less than – those of prior closed investigations.

In sum, and for reasons stated above, Nissan does not believe this issue poses an unreasonable risk to motor vehicle safety.

ATTACHMENT A

DVD containing information responsive to requests 1, 3, 4, and 5

This attachment contains a DVD containing the information related to Request Numbers 1, 3, 4 and 5. The information was obtained from the production, consumer complaints, Tech Line, Global CARS, Legal and the warranty databases May 20, 2014. The databases are updated daily.

ATTACHMENT B

Warranty Claims Data

Warranty claims data were gathered from Warranty database May 20, 2015.

The search criteria used by Nissan to identify the claims identified in response to Request No. 5 is as follows:

Model Codes: C11 (VERSA)

Full Model Year Code: between 2007 and 2011

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

KeyWord	Symptoms
COIL%SPRING	FRACTURE
SUSPENSION%SPRING	BREAK
FRONT%SPRING	CRACK
SHOCK%SPRING	TIRE
SPRING%FRACTURE	PUNCTURE
FRACTURE%SPRING	SIDEWALL
BROKE%SPRING	BROKEN
SPRING%BROKE	FAILURE
	FATIGUE
	SNAP
	BANG
	BROKE
	BRAKE LINE

The resulting data were reviewed for relevancy to the request. Any documents that were obviously a different issue or otherwise non-responsive were removed. Any documents in which relevancy could not be determined because the verbatim was too vague were included in the submission.

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

ATTACHMENT C

DVD containing information responsive to request 6

ATTACHMENT D

DVD containing information responsive to request 7

CONFIDENTIAL ATTACHMENT E

DVD containing information responsive to Request 8

CONFIDENTIAL ATTACHMENT F

DVD containing information responsive to Request 9

CONFIDENTIAL ATTACHMENT G

DVD containing information responsive to Request 10

CONFIDENTIAL ATTACHMENT H

DVD containing information responsive to Request 11