

Mazda North American Operations



Mr. Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
Room W48-336
1200 New Jersey Avenue, SE
Washington, DC 20590

August 7, 2015

Re: NHTSA PE15-022: NVS-213ps;

Dear Mr. Quandt

Enclosed is Mazda Motor Corporation (Mazda) response to the information request for PE15-022 dated June 18, 2015. The response is provided in duplicate and includes the electric files contained on the enclosed CD's.

Mazda is not requesting confidential treatment for the information contained in our response. However, certain documents provided as part of our response may contain personal information of individuals that may be inappropriate for public disclosure. We request that such personal information not to be made public under FOIA exemption 6.5 U.S.C. 5525(b) (6).

drobertson@mazdausa.com

My telephone number is 202-467-5093 and my e-mail

Sincerely,

David Robertson, Group Manager
Product Development Group 1
Mazda North American Operations

Mazda Response: NHTSA Inquiry NVS-213ps, PE15-022

Mazda has prepared this response to PE15-022 after a thorough search for the information requested and has made every effort to provide thorough and accurate information to support this information request.

The answers to your questions are set forth below. In accordance to your request, the question is first cited, with the response directly following its question.

Mazda has based the scope of this search on the following criteria:

Subject vehicles: All 2007 through 2008 Mazda CX-9 vehicles manufactured for sale or lease in the United States and federalized territories.

Peer vehicles: all other Mazda CX-9 vehicles originally equipped with the same front suspension LCA (LCA) assemblies as the subject vehicles.

Subject component: Right and left front suspension LCA assemblies used as original equipment or service parts in the subject vehicles.

Alleged defect: Front suspension lower ball joint separation.

Mazda notes that some of the documents and information that are provided in response to this inquiry might contain personal customer information such as customer names, addresses, and telephone numbers, as well as, full Vehicle Identification Numbers (VINs). Mazda respectfully requests that such personal information not be made public under FOIA Exemption 6. 5 U.S.C. 552 (b) (6).

***Request 1.** State, by model year, the number of subject vehicles Mazda has manufactured for sale or lease in the United States and federalized territories. Separately, for each subject vehicle manufactured to date by Mazda, 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

Response 1

Mazda records (as of July 8, 2015) indicate that the total number of subject vehicles manufactured for sale or lease in the United States and its territories (Guam, Northern Mariana Islands, and Puerto

Rico) is 54,587. The break down by model year is as follows: 2007 MY is 17,603 and 2008 MY is 36,984. The requested data for each subject vehicles is provided electronically in Microsoft Access format entitled **PRODUCTION DATA** in Appendix 1.

Request 2. *State, by model year, the number of each of the following, received by Mazda, or of which Mazda is otherwise aware, which relate to, or may relate to, the alleged defect in the subject or peer vehicles:*

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

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 Mazda’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.

Response 2

The result of data collected for Request 2, subparts “a” through “f”, is summarized in the chart below and included reports collected through July 3, 2015. Mazda determined that peer vehicles are 2009 through 2014 MY CX-9. Multiple reports in regard to the same incident have also been counted separately.

Category	Subject		Peer					
	2007 MY	2008 MY	2009 MY	2010 MY	2011 MY	2012 MY	2013 MY	2014 MY
a. Consumer Complaints	0	0	1	4	1	0	0	0
b. Field Reports	0	0	10	6	3	0	1	1
c. Crash, Injury or Fatality	0	0	0	0	0	0	0	0
d. Property Damage	0	0	0	0	0	0	0	0
e. Arbitration/Mediation	0	0	0	0	0	0	0	0
f. Lawsuits	0	0	0	0	0	0	0	0
Grand Total	0	0	11	10	4	0	0	0

Request 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. Mazda’s file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle’s VIN;
- e. Vehicle’s make, model and model year;
- f. Vehicle’s mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. 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 pre-formatted table which provides further details regarding this submission.

Response 3

The requested information, for consumer complaints, field reports, crash, injury or fatality reports, property damage claims, arbitration/mediations, and lawsuits in response to Request 2 is provided separately in Microsoft Access format entitled **REQUEST NUMBER TWO DATA** in Appendix 3.

Each record has been assigned a File ID that has been prefixed with the source of the information as follows:

File ID Prefix	Category	Source of Information	Number of Files
VOQ	Consumer Complaints	NHTSA VOQs	16
CAC	Consumer Complaints	Customer Assistance Center	38
Care	Consumer Complaints	Mazda Care Survey	4
eMQF	Consumer Complaints	e-MNAO Quality Feedback Survey	1
Hotline	Field Reports	Technical Hotline	51
PQI	Field Reports	Product Quality Information	3
VIR	Field Reports	Vehicle Inspect	2
Grand Total			115

Request 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 Mazda used for organizing the documents.

Response 4

The requested information, for consumer complaints, field reports in the NNS(*) in response to Request 2 is provided electronically in Appendix 4.

(*)NNS: New National System is a database system maintained by Mazda North American Operations (MNAO). It is a core information system and supports various customer service activities such as customer relations, repair inquiry, warranty claim submission and others.

***Request 5.** State, by model year, total count for all of the following categories of claims, collectively, that have been paid by Mazda to date that relate to, or may relate to, LBJ wear related failures (e.g., excessive ball joint end-play or radial-play) in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.*

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

- a. Mazda's claim number;*
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;*
- c. Vehicle's VIN;*
- d. Vehicles 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. Concern stated by customer;*
- l. Diagnostic trouble code(s) identified during the repair;*
- m. Cause and Correction stated by dealer/technician; and*
- n. 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.

Response 5

In response to Request 5, a search of the Mazda Global Warranty System has been completed as of July 3, 2015. Analysts then reviewed the data and kept claims that may be related to the alleged defect and Mazda identified 140 cases. The results are provided in Microsoft Access format entitled **WARRANTY DATA** in Appendix 5.

Request 6. Describe in detail the search criteria used by Mazda 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 Mazda 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 Mazda 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.

Response 6

The following information is the search criteria.

- Model / Model Year: Mazda CX-9 / 2007 through 2008 MY
- Parts number

Part Description	Part Number
COVER,BALL JOINT	L206-34-552
ARM(L),LOWER	TD11-34-350B
	TE69-34-350
	TE69-34-350C
ARM(R),LOWER	TD11-34-300B
	TD11-34-300C
	TD11-34-300E

Mazda Global Warranty System was used to provide an initial search of all warranty claims that may have occurred and then Mazda reviewed the data and kept claims that may be related to the alleged defect.

Also, the terms of the new vehicle warranty coverage and extended warranty coverage are below.

2007 through 2008 MY CX-9 Warranty Coverage:

Warranty Type	Term in Months	Term in Miles
Basic Warranty	36	36,000
Powertrain	60	60,000
Brake booster warranty extension (service campaign SSP93)	84	90,000

Request 7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Mazda 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 Mazda is planning to issue within the next 120 days.

Response 7

Mazda will issue an inspection and repair procedure that relates to the alleged defect. The copy of the draft is provided in Appendix 7.

Request 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 vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Mazda. For each such action, provide the following information:*

- a. Action title or identifier;*
- b. The actual or planned start date;*
- c. The actual or expected end date;*
- d. Brief summary of the subject and objective of the action;*
- e. 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 by any and all engineering working groups (e.g., vehicle dynamics control task force) of which Mazda is an active member or is otherwise 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.

Response 8

Response to request 8 is provided in file **ACTIONS** in Appendix 8.

Request 9. *Describe all modifications or changes made by, or on behalf of, Mazda in the design, software, material composition, manufacture, quality control, supply, or installation of the 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; and
- g. When the modified component was made available as a service component.

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

Response 9

Response to request 9 is provided in **MODIFICATION AND CHANGE** in Appendix 9.

Request 10. State the number of subject components that Mazda 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, sales region(e.g., regional parts distribution center) 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 Mazda is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage. Provide Mazda's estimate of the approximate percentage of subject vehicles registered in each parts distribution center.

Response 10

The following chart is the summary of subject components that Mazda sold for use in the subject vehicles. Response to request 10 for details is provided in **COMPONENT PARTS** in Appendix 10. These data is extracted as of June 29, 2015.

Part Description	Part Number
COVER,BALL JOINT	L206-34-552
ARM(L),LOWER	TD11-34-350B
	TE69-34-350
	TE69-34-350C
ARM(R),LOWER	TD11-34-300B
	TD11-34-300C
	TD11-34-300E

Supplier name: Y-TEC CO., LTD.

Address: 3-74, Soda, Kaita-cho, Aki-gun, Hiroshima, Japan.

Point of Contact: Seiji Fukunaga Title: General Manager, Quality Assurance Department

Telephone number: +81-82-823-2494

Company name: THK RHYTHM CO., LTD.

Address: 283-3, Gokyu-cho, Minami-ku, Hamamatsu, Shizuoka, Japan.

Point of contact: Mamoru Suzuki Title: General Manager, Quality Assurance Department

Telephone number: +81-53-462-2211

Mazda identifies that 2007-2014MY CX-9 are installed with the same components as the subjected vehicles in production and in service and any other models is not applied.

Regarding the alleged defect Mazda determined to conduct a safety recall on 2007-2014MY CX-9 on July 9, 2015 and submitted Part 573 report to NHTSA on July 16, 2015. Mazda will replace the left front and right front lower control arms with the modified parts.