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May 22, 2015

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

Re: RQ15-001; NVS 212mjl

Dear Mr. Yon,

Enclosed is Nissan's partial response to the referenced NHTSA Information Request of April 2, 2015 concerning the Agency's investigation of allegations involving recurrence of the defect condition as found in voluntary safety recall 14V-138, or any improper/incorrect/unwanted illumination of the front passenger air bag status light for adult occupants of sufficient (or unknown) weight, or any asymmetrical deployment of the frontal air bags in a crash where the passenger air bag does not deploy while the driver air bag deploys in Model Year (MY) 2013-2014 Nissan Altima, Pathfinder, Sentra and LEAF; MY 2013 Infiniti JX35; MY 2014 Infiniti QX60 and Q50; and MY 2013 Nissan NV200/Taxi 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

Handwritten: May 22/15
Stamp: MAY 22 11:11 AM '15

Response to
RQ15-001

REC-2015-00118

May 26, 15

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 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 about 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, April 2, 2015. Nissan appreciates the agency's consideration in granting a two week extension for the full response.

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 and model year, the number of subject vehicles that Nissan has manufactured for sale or lease in the United States. Separately, for each subject 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."

Table 1. Production Data Summary

MODEL	MODEL YEAR	UNITS
Altima	2013	360,925
Altima	2014	182,924
Pathfinder	2013	79,906
Pathfinder	2014	44,242
Sentra	2013	151,928
Sentra	2014	28,961
LEAF	2013	26,096
LEAF	2014	3,060
JX35	2013	43,115
QX60	2014	20,200
Q50	2014	38,881
NV200/Taxi	2013	6,065
NV200/Taxi	2014	523

The information requested in 1.a through 1.g is provided, when known, in a Microsoft Access table titled " RQ15-001_PRODUCTION DATA" on a DVD enclosed as Attachment A.

2. Separately, by model and model year, state the number of each of the following, received by Nissan, or of which Nissan is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality;

- d. Property damage claims;
- e. Third-party arbitration proceedings where Nissan is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Nissan is or was a defendant or codefendant.

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

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

Nissan will supplement this response at a later date.

- 3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No.2, state the following information:
 - a. Nissan's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Reported weight of the front passenger occupant(s) allegedly being misclassified thus turning off the passenger air bag;
 - 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."

Nissan will supplement this response at a later date.

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

Nissan will supplement this response at a later date.

5. State, by model and model year, a total count for all of the following categories of claims (excluding recall remedy repair claims for the subject recall; see Request No. 11 regarding remedy repair claims), collectively, that have been paid by Nissan to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

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

- a. Nissan's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- c. Vehicle's VIN;
- d. Vehicle's make, 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(s);
- i. Problem code(s);
- j. Diagnostic trouble code(s), if any;
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer;
- m. Cause as stated on the repair order;
- n. Correction as stated on the repair order; and
- o. Comment, if any, by dealer/technician relating to claim and/or repair.

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

Table 2. Warranty Data Summary

VEHICLE MODEL	VEHICLE MODEL YEAR	WARRANTY COUNT
ALTIMA	2013	1,328
ALTIMA	2014	616
JX	2013	239
LEAF	2013	19
LEAF	2014	1
NV200 S 2WD	2013	3
PATHFINDER	2013	559
PATHFINDER	2014	280
Q50	2014	40
QX60	2014	87
SENTRA	2013	341
SENTRA	2014	42

The information requested in 5.a through 5.o is provided, when known, in a Microsoft Access table titled "RQ15-001_WARRANTY DATA" on a DVD enclosed as Attachment A.

The warranty claims shown in Table 2 above and in the attached data table all indicate:

- I. illumination of the front passenger air bag status light (PABI); or
- II. the warranty claim does not include enough information to determine the status of the PABI lamp.

The warranty claims shown in Table 2 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.

Nissan has received no relevant warranty claims on vehicles that have undergone the recall repair and that would apply to the alleged defect described in section (a) of the RQ. Furthermore, Nissan has no claims on vehicles that have undergone the recall repair and that relate to any unusual asymmetrical deployment as described in section (c) of the RQ. To be specific, there are zero warranty claims that suggest that the recall condition persists or has appeared in any vehicle that underwent the recall repair.

Warranty claims containing diagnostic trouble codes (DTCs) which, by design, illuminate the red supplemental air bag warning light were excluded from this submission. This was done even if some of those same DTCs simultaneously illuminate the PABI lamp. Additionally, warranty claims indicating illumination of the red supplemental air bag warning light were excluded from this submission even if the associated DTCs were not noted. These claims were excluded because they represent repairs that are not related to the alleged defect.

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 lists of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by model 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.

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.

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

Table 3. Extended Warranty Summary

MODEL	MODEL YEAR	OPTION							
		GOLD	GOLD PREFERRED	INFINITI ELITE	NCV POWERTRAIN	NCV SILVER PREFERRED	POWER-TRAIN PREFERRED	SILVER	SILVER PREFERRED
		VEHICLES COVERED							
JX	2013			3,807					
Q50	2014			2,145					
QX60	2014			2,698					
ALTIMA	2013	51	90,070				321	2	2,052
LEAF	2013		1,909						15
NV200 S 2WD	2013				24	423			
PATHFINDER	2013	6	16,998				71		463
SENTRA	2013	12	47,770				130		1,197
ALTIMA	2014	36	64,222				64	1	1,339
LEAF	2014		704						6
NV200 S 2WD	2014				14	307			
PATHFINDER	2014	5	17,739				42		519
SENTRA	2014	20	43,078				59		1,277
COVERAGE		Up to 8 years and 120,000 miles							

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 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.

Nissan will supplement this response at a later date.

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, Nissan. This includes, but is not limited to, all actions by the subject component manufacturer relating to the alleged defect in the subject vehicles and all actions related or leading to the subject recall. 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.

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. If an action is not complete, provide a detailed schedule for the work to be done, tentative findings and/or conclusions, and provide an update within 10 days of completion of the action.

Nissan will supplement this response at a later date.

9. Describe in detail 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 components, including all OCS algorithm changes, software updates and hardware changes, in the subject vehicles, from the start of production to the end of production of the subject vehicles, 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. Whether the modification or change was related to the subject recall;
 - e. The part number(s) (engineering and service) of the original component;
 - f. The part number(s) (engineering and service) of the modified component;
 - g. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - h. When the modified component was made available as a service component; and
 - i. Whether the modified component can be interchanged with earlier production components.

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.

Nissan will supplement this response at a later date.

10. State, by model and model year, all part numbers of the subject components that have been installed in the subject vehicles as assembled by Nissan (i.e., as original equipment), and the service part numbers of the subject components Nissan designates for installation on the subject vehicles. State, by sales month, sales year and part number, the total number of subject components sold as service parts by Nissan. Identify any kits that Nissan has released or developed for use in service repairs to the subject components or assembly.

For each subject component part number, provide the supplier's name, address, and point of contact used by Nissan (name, title and telephone number). Also, identify by model and model year, any other vehicles of which Nissan is aware that contain the identical subject component, whether installed in production or in service, and state the applicable dates of production or service usage.

Nissan will supplement this response at a later date.

11. State, by model and model year, a total count for all recall remedy repair claims for the subject recall. Explain how Nissan searched and identified the claims responsive to this request.

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

- a. Nissan's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- c. Vehicle's VIN;
- d. Vehicle's make, 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(s);
- i. Problem code(s);
- j. Diagnostic trouble code(s), if any;
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer;
- m. Cause as stated on the repair order;
- n. Correction as stated on the repair order; and
- o. Comment, if any, by dealer/technician relating to claim and/or repair.

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

Table 4. Recall Remedy Repair Claims

VEHICLE MODEL	VEHICLE MODEL YEAR	RECALL REMEDY REPAIR CLAIMS
ALTIMA	2013	288,299
ALTIMA	2014	154,799
JX	2013	38,228
LEAF	2013	21,260
LEAF	2014	2,471
NV TAXI	2014	354
NV200 S 2WD	2013	3,437
PATHFINDER	2013	66,735
PATHFINDER	2014	38,337
Q50	2014	35,503
QX60	2014	18,452
SENTRA	2013	114,618
SENTRA	2014	25,084

The search criteria used by Nissan to identify the claims identified in response to Request No. 11 is as follows:

Model Codes: L33 (ALTIMA), R52 (PATHFINDER), L50 (JX/QX60), B17 (SENTRA), ZE0 (LEAF), M20 (NV200), M30 (TAXI), V37 (Q50)

PFID Identification Number: R1404 OR R1405

The information requested in 11.a through 11.o is provided, when known, in a Microsoft Access table titled "RQ15-001_RECALL DATA" on a DVD enclosed as Attachment A.

The answers given to Request No. 11 above and attached were gathered from Nissan's warranty data and are current as of April 2, 2015.

12. Describe in detail the design and function of the OCS, including all its components, in the subject vehicles. Your response should include, but is not limited to, the following information:
- Strategies, logic and algorithms used for classifying occupants and objects in the front passenger seat, including as they relate to the defect identified in the subject recall;
 - Block/component diagram for the logic operation of the OCS; and
 - Description of similarities and differences, if any, in the subject components among the subject vehicles. Provide this information by model and model year.

Nissan will supplement this response at a later date.

13. Provide, by model and model year, a table showing all OCS software versions that have been used on the subject vehicles by implementation date from the start of production to the end of production of the subject vehicles. Include a description of each software version and indicate whether any version has been used, or is still being used, for updating the original version during service repairs; if so, for each version used in service, include the start and end dates of use.

Nissan will supplement this response at a later date.

14. Furnish Nissan's assessment of the alleged defect in the subject vehicles, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The VOQ reports referenced in this inquiry.

Nissan will supplement this response at a later date.

ATTACHMENT A

CD with Information Related to Requests 1, 5 and 11

This attachment contains a CD containing the information related to Request Numbers 1, 5 and 11. The information was obtained from the production database and the warranty database April 2, 2014. The databases are updated daily.

ATTACHMENT BWarranty Claims Data

Warranty claims data were gathered from Warranty database April 2, 2015.

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

Model Codes: L33 (ALTIMA), R52 (PATHFINDER), L50 (JX/QX60), B17 (SENTRA),
ZE0 (LEAF), M20 (NV200), M30 (TAXI), V37 (Q50)

Open Date: Greater than April 4, 2014

Warranty Code: Exclude ZZ (recall repair)

Customer or Technician Verbatim must contain at least one word from the following list:

KeyWord

PASS%AIR%BAG%
ODS
OCCUPANT DETECT
AIR%BAG%OFF%LIGHT
OCS

Claims matching the keywords as specified above were then filtered against the recall repair records to include only claims received after the vehicle had the subject recall performed. 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

New Vehicle Warranty Coverage Documents