



U.S. Department  
of Transportation

**National  
Highway  
Traffic Safety  
Administration**

## ODI RESUME

**Investigation:** AQ18001

**Prompted By:** Recall 17V-408

**Date Opened:** 04/02/2018

**Date** 09/25/2024

**Closed:**

**Investigator:** Choon Lee

**Reviewer:** Alexander Ansley

**Approver:** Tanya Topka

**Subject:** Zipcar Rental Concerns

### MANUFACTURER & PRODUCT INFORMATION

**Manufacturer:** Zipcar, Inc.

**Products:** All Vehicles Owned by Zipcar, Inc.

**Population:** 12,000 (Estimated)

**Problem Description:** NHTSA received information suggesting that Zipcar, Inc. rented at least one vehicle to a customer without having completed required safety recall repairs on that vehicle.

### ACTION/SUMMARY INFORMATION

**Action:** Close Audit Query (AQ)

**Summary:**

NHTSA opened this audit query to determine whether Zipcar, Inc. (Zipcar) complied with the requirements of the National Traffic and Motor Vehicle Safety Act (Safety Act). The Safety Act requires, among other things, that a rental car company not rent, lease, or sell a recalled vehicle until the safety defect or noncompliance is remedied. 49 U.S.C. § 30120(i).

Based on NHTSA's inquiry, including information provided by Zipcar, NHTSA asserted that, during 2017 and 2018, Zipcar rented certain unremedied recalled vehicles in violation of the Safety Act. In October 2023, NHTSA and Zipcar entered into a Consent Order in which Zipcar agreed to pay a total civil penalty of \$300,000. The total civil penalty included a payment of \$150,000 as a Non-Deferred Amount. Zipcar also agreed to a sum of \$150,000 as an Abeyance Amount, to be deferred and held in abeyance pending its satisfactory completion, as reasonably determined by NHTSA, of the requirements of the Consent Order. The requirements of the Consent Order include performance obligations that relate to process improvements to Zipcar's recall compliance procedures and its training materials. Zipcar agreed to conduct an audit of all Zipcar vehicles with an open recall within 150 days after the Effective Date of the Consent Order. Zipcar also agreed to quarterly meetings with NHTSA staff to discuss the progress of the performance obligations and issues or concerns from either party.

This audit query investigation, AQ18001, is closed. Closure of this AQ has no bearing on the terms of the Consent Order, including Zipcar's ongoing performance obligations or other legal

obligations, and does not represent a determination by NHTSA about Zipcar's performance under the Consent Order to date.