



MITSUBISHI MOTORS NORTH AMERICA, INC.
4031 Aspen Grove Dr, Franklin, TN 37067

May 11, 2022

Stephen Ridella, Director
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

RE: NEF-102bes, EA19-001

Dear Dr. Ridella:

Mitsubishi Motors North America, Inc. (MMNA) hereby submits this letter in response to your Information Request related to Engineering Analysis EA19-001, dated March 31, 2022. These responses were prepared through consultation with Mitsubishi Motors Corporation (MMC).

Similar to MMNA's previous EA19-001 Information Request response submitted on August 29, 2019, the following replies are applicable to the vehicles that, according to MMNA's records, contain the DS84 ASIC.

The following responses and included documents are confidential commercial business information. In accordance with 49 CFR Part 512, MMNA is submitting this confidential information, together with a request for confidential treatment, to the Office of Chief Counsel.

In the event you have any questions or need any additional information, please contact Kurt Kurata at kurt.kurata@na.mitsubishi-motors.com at your earliest opportunity.

Sincerely,



Daniel Ball
Vice President, Aftersales
Mitsubishi Motors North America, Inc.

- R1.** State, by model and model year the number of each of the following, received by Mitsubishi, or of which Mitsubishi 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 for ACUs returned from the field or from test vehicles;
 - d. Reports involving a crash, injury or fatality;
 - e. Property damage claims;
 - f. Third-party arbitration proceedings where Mitsubishi is or was a party to the arbitration; and
 - g. Lawsuits, both pending and closed, in which Mitsubishi is or was a defendant or codefendant.

A1. Please see the Excel worksheet entitled "A1".

Source: MMNA and MMC Internal Records

Last Date Information Gathered: April 18, 2022

- R2.** Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:
- a. Mitsubishi's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 1 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), street address, email 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;
 - i) The AIS score of the injuries; and
 - ii) Description of injury and location.
 - l. Number of alleged fatalities, if any; and
 - m. All applicable indicators for the Alleged Defect (items A through H as identified above).

A2: Please see the Excel worksheet entitled "REQUEST NUMBER ONE DATA".

Source: MMNA and MMC Internal Records

Last Date Information Gathered: April 18, 2022

- R3.** Produce copies of all documents related to each item within the scope of Request No. 1. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Mitsubishi used for organizing the documents. Describe in detail the search methods and search criteria used by Mitsubishi to identify the items in response to Request No. 1.
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- A3. Copies of documents are provided in folder "A3", in the appropriately named subfolders. Where feasible, files relating to each item are named after the identifier listed in "REQUEST NUMBER ONE DATA" worksheet, column "A".**

**Search criteria used in Customer Relations and Legal systems – period 8/14/2019 – current, affected model/model years and "AKTI", "KTI", "AIR BAG DID NOT DEPLOY".
Product Support systems – affected model/model years and air bag repair group**

Source: MMNA and MMC Internal Records

Last Date Information Gathered: April 18, 2022

- R4.** 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 by, or for, Mitsubishi. For each such action, provide the following information:
- a. Action title or identifier;
 - b. The actual 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. Final Report of the findings and/or conclusions resulting from the action.

- A4. MMC has not performed any test that relate to, or may relate to, the alleged defect in the subject vehicles.**

Source: MMC Internal Records

Last Date Information Gathered: April 18, 2022

- R5.** Furnish Mitsubishi'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. Any prior safety recalls Mitsubishi has conducted to address EOS related failures of the subject ACU, the remedy that was utilized in that recall action, and how, in Mitsubishi's assessment, that action addresses any residual risk of an EOS failure of the DS84 ASIC;
 - e. The risk to motor vehicle safety that it poses.

- A5. Mitsubishi does not have assessments since Mitsubishi is not aware of an alleged defect in a subject vehicle.**

Source: N/A

Last Date Information Gathered: N/A
