

NISSAN GROUP
OF NORTH AMERICA



Nissan North America, Inc.

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May 21, 2020

Scott Yon
Chief, Vehicle Defects Division B
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
West Building W41-227
Washington, D.C. 20590

Re: Update to PE19-015 Request 11

Dear Mr. Yon,

I would like to update you on Nissan's assessment of PE19-015 and additional actions that have been taken since our initial response on December 13, 2019.

Nissan does not believe that the alleged defect is an unreasonable risk to safety in the subject vehicles.

Some of the factors used in this assessment are:

- Investigation of collected incident parts showed external factors were responsible for the OCS mat malfunction.
- Clear visual warning given to the driver that the OCS mat has malfunctioned
- Lower incident rate observed in the subject vehicles when compared to previous NHTSA investigations of OCS sensors, considering that the subject vehicles had more time in service at the time of the investigation.

Nissan further identified that most of the complaints received for this issue involved a high customer expense for the cost of repair for the OCS system. After reviewing and benchmarking publicly available pricing for similar parts and further internal analysis, Nissan was able to reduce the average recommended retail price of the parts. This reduction should help to address the customer satisfaction aspect of these complaints.

Thank you and best regards,

A handwritten signature in black ink, appearing to read "Derek Latta".

Derek Latta
Manager, Technical Compliance