



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

OFFICE OF DEFECTS INVESTIGATION

ODI RESUME

Investigation: DP25002
Prompted By: Defect Petition
Date Opened: 12/23/2025
Date: 07/22/2026
Closed:
Investigator: Ayesha Huertas-Torres
Reviewer: Sharon Yukevich
Approver: Tanya Topka
Subject: Emergency egress controls are not readily accessible and clearly identifiable.

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: Tesla, Inc.
Products: Model Year (MY) 2022 Model 3
Population: 179,701 (Estimated)
Problem Description: Controls for the mechanical door release are not accessible and clearly identifiable, failing to comply with Federal Motor Vehicle Safety Standard (FMVSS) 206.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	EWR D&I	Other	Total	EWR Field Reports
All Incidents:	1	0	0	0	1	0
Crashes/Fires:	1	0	0	0	1	0
Injury Incidents:	1	0	0	0	1	0
Number of Injuries:	1	0	0	0	1	0
Fatality Incidents:	0	0	0	0	0	0
Number of Fatalities:	0	0	0	0	0	0

ACTION/SUMMARY INFORMATION

Action: DP25-002 is denied.

Summary:

The Office of Defects Investigation (ODI) has completed its review of a defect petition received on November 24, 2025, requesting an investigation into the emergency mechanical door release in 2022 Model Year (MY) Tesla Model 3. The petition alleges that the controls for the emergency mechanical door release are not accessible and clearly identifiable and thus fail to comply with Federal Motor Vehicle Safety Standard (FMVSS) 206.

A vehicle equipped with electric door handles without an accessible mechanical door release creates a risk to safety when the electric door handle becomes inoperative due to loss of power and occupants are unable to easily locate the mechanical door release to exit the vehicle in case of an emergency. A concealed or hard to locate emergency door release could prevent an operator or occupant from exiting the vehicle in the event of an emergency, such as a crash or fire. The potential risk for entrapment can result in a severe injury or death of the operator and other occupants of the vehicle.

As of March 13, 2026, out of the population of 179,031 subject vehicles, NHTSA has identified one (1) consumer complaint, in NHTSA's databases alleging that the mechanical door release is concealed and unlabeled, resulting in a risk of entrapment in the event of an emergency, as cited in the Petition. The complaint is for the same Vehicle Identification Number (VIN) as the subject vehicle of the Petition. The allegation describes a front impact collision, where the vehicle lost electrical power, and the electric door mechanism stopped working.

The 2022 MY Model 3 has a mechanical release for the front doors, located in front of the window switch on the door's interior and consists of a lever that can be pulled up to open the door. The subject vehicle does not have a mechanical release for the back doors.

The owner's manual for the 2022 MY Tesla Model 3 includes a section labeled "In Case of Emergency" that details how to open doors from the interior when the vehicle has no electrical power. The owner's manual refers to the mechanical release as a "manual door release." The owner's manual instructs the operator to "pull up the manual door release located in front of the window switches." The owner's manual includes an illustration showing the mechanical door release lever and its location on the door. The illustration depicts an image of the door with the window switch and lever, including a blue arrow pointing to the location of the lever to demonstrate the upward movement required to operate the lever. The lever shown in the illustration does not contain a label to identify it. Although they vary in design and location, mechanical releases for the front doors are available on all Tesla models. The location and operation of the mechanical release is described in the owner's manual for each Tesla model. Further, the owner's manual cautions the operator that the mechanical door release should only be used when the subject vehicle has no power or if otherwise necessary. If the subject vehicle has power, the button located at the top of the interior door handle should be used to open the doors.

The Petition also stated the lack of an accessible mechanical emergency door release is a violation of the requirements of Federal Motor Vehicle Safety Standard (FMVSS) 206 (49 CFR § 571.206). FMVSS 206 specifies performance requirements for vehicle door locks, latches, hinges, and attachment components to prevent passenger ejection during crashes. It applies to passenger cars, trucks, and buses with a GVWR of 4,536 kg (10,000 lbs.) or less, focusing on maintaining latch engagement under inertial loads and structural integrity. No requirements exist in the standard that address the Petitioner's concern regarding the labeling and location of an emergency mechanical door release in passenger cars.

On November 4, 2025, NHTSA's Office of Rulemaking received a petition to initiate the issuance of a new Federal Motor Vehicle Safety Standard (FMVSS) to mandate a robust and obvious door egress system in all motor vehicles. The request has been granted, and the Agency will accordingly commence a rulemaking proceeding. See 49 CFR § 552.9. A decision as to the issuance of a rule will be made on the basis of all available information developed in the course of the rulemaking proceeding, in accordance with statutory criteria. Id.

The Agency has thoroughly assessed the material submitted by the Petitioner, consumer complaint information in NHTSA's databases, and other relevant information already in possession of the Agency. NHTSA does not believe that the issues presented by the Petitioner indicate the likelihood of a safety related defect that would warrant a defect investigation, and the issue is best addressed through the rulemaking process. After full consideration of the available information and the commencement of the related rulemaking proceeding, the Petition is denied. Further specifics can be found in the Federal Register Notice.

The ODI report cited above can be viewed at [NHTSA.gov](https://www.nhtsa.gov) under ODI Number 11701894 and the Defect Petition can be viewed under ODI Number 11698174.