



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



December 23, 2025

Mr. Popo Su

Jilin Province Detiannuo Safety Technology Co., Ltd. (DTN)

No.5, Xinkai Road Xinxing

Town of Yitong County, Siping City of Jilin Province

Subject: Information Request ID EA25-005

Dear Mr. Su:

As you are aware, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has an ongoing Engineering Analysis (EA25005) to investigate allegations of ruptures involving air bag inflators manufactured by Jilin Province Detiannuo Safety Technology Co., Ltd. (DTN). ODI is requesting information from DTN to facilitate its investigation of the potential risk of a deployment-related field rupture of the air bag inflators that have made their way into the U.S. market.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject Component:** Front driver air bag inflators manufactured by DTN.
- **Peer Component:** All air bag inflators manufactured by DTN other than Subject Component.
- **Alleged Defect:** DTN Air Bag Inflator Rupture.
- **DTN:** Jilin Province Detiannuo Safety Technology Co., Ltd, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of DTN (including all business units

and persons previously referred to), who are or, in or after 2000, were involved with any of the following related to the alleged defect in the subject component:

- a. Design, engineering, analysis, modification or production (e.g., quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, lawsuits or arbitrations; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by DTN, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by DTN or not. If a document is not in the English language, provide both the original document and an English translation of the document.
 - **Other Terms:** To the extent that they are used in these information requests, the terms "air bag," "claim," "consumer complaint," "dealer field report," "equipment," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty,"

"warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 C.F.R. § 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as DTN has previously provided a document to ODI, DTN may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After DTN's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. Identify all Subject Components DTN produced. Separately, for each part number and by calendar year, provide the following additional information regarding Subject Component part number in tabular form entitled "DTN PRODUCTION DATA" using the supplied Excel spreadsheet. Include tolerances where appropriate.
 - a. Part Number;
 - b. Product Code/Model;
 - c. Inflator Serial Number;
 - d. Single or Dual Stage;
 - e. Manufacturing Plant (Name and Location);
 - f. Manufacturing Line;
 - g. Production Dates; and
 - h. Total number of inflators produced by calendar year.

2. Identify all customers and/or air bag module manufacturers to whom DTN provided the Subject Components. Separately for each customer or air bag module manufacturer provide the following information by part number and by calendar year in tabular form entitled "DTN CUSTOMER DATA" using the supplied excel spreadsheet.
 - a. DTN part number;
 - b. DTN product code/model;
 - c. Single or dual stage;
 - d. Customer name;
 - e. Customer part number;
 - f. DTN manufacturing plant (Name and Location);
 - g. DTN manufacturing line;
 - h. Final stage user/OEM - if known; and
 - i. Total number of parts provided by calendar year.

3. For each part number in response to Request 1, identify and describe in detail the basic design and construction of the Subject Component. Include design requirements and/or specifications for the major hardware components and gas generating materials incorporated to ignite the inflator and fill the air bag cushion. Supply this information in

tabular form entitled “DTN INFLATOR SPEC DATA” using the supplied excel spreadsheet.

4. State who sets the specifications for Subject Component performance and design.
5. For each part number in response to Request 1, provide the weights and geometry of all gas generating material. Separately, describe in detail the design intent sequence of events that lead to the intended performance of the Subject Component (i.e., a step by step description of how the inflator is intended to work) including the precise timing and tolerances of each event relative to initiation of the deployment. Supply this information in tabular form entitled “DTN PROPELLANT DATA” using the supplied excel spreadsheet.
6. For each part number identified in response to Request 1, provide the following data regarding inflator component dimensions, including dimension tolerances. Supply this information in tabular form entitled “DTN INFLATOR COMPONENT DIMENSIONS” using the supplied excel spreadsheet:
 - a. Part number;
 - b. Product code/model;
 - c. Production dates;
 - d. Upper pressure vessel inner diameter;
 - e. Upper pressure vessel outer diameter;
 - f. Upper pressure vessel height;
 - g. Lower pressure vessel inner diameter;
 - h. Lower pressure vessel outer diameter;
 - i. Lower pressure vessel height;
 - j. Center support inner diameter;
 - k. Center support outer diameter;
 - l. Center support height;
 - m. Initiator assembly diameter;
 - n. Initiator assembly height;
 - o. Primary propellant number of wafers;
 - p. Secondary propellant number of wafers;
 - q. Generator disk diameter;
 - r. Exit orifice diameter;
 - s. Manifold inner diameter;
 - t. Manifold outer diameter;
 - u. Manifold height;
 - v. Inflator assembly height without manifold;
 - w. Inflator assembly height with manifold; and
 - x. Any other inflator components not listed above.
7. For each DTN manufacturing plant and manufacturing line that produces or has produced the Subject Components, describe in detail the manufacturing processes DTN uses/used to manufacture the Subject Component. Each plant and line should have its own detailed description. Describe or otherwise provide detailed information for any processes or specialized equipment DTN uses/used to address the prevention of the Alleged Defect from occurring.
8. Describe all modifications or changes made by, or on behalf of, DTN in the design, manufacture (including operations and/or production equipment), monitoring and/or

maintenance processes of production equipment, or material composition of the Subject Component. 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 the Subject Component manufacture;
 - b. A detailed description of the modification or change;
 - c. The part number(s) of the original component – for design modifications or changes;
 - d. The part number(s) of the modified component – for design modifications or changes;
 - e. Whether and when the original unmodified component was withdrawn from production and/or sale – for design modifications or changes;
 - f. When the modified component was made available as a service component – for design modifications and changes; and
 - g. Whether the modified component can be interchanged with earlier production components – for design modifications or changes.
9. Describe how the modifications or changes cited in Request 8 relate or may relate to the Alleged Defect in the Subject Component and whether they increase or decrease the likelihood of the Alleged Defect. Include all supporting evidence.
10. 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, DTN. 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.

11. Using the information from the Requests above and any other relevant information, provide DTN's assessment of the cause(s) of the Alleged Defect in the Subject Component. Provide any other findings, conclusions, observations, or assessments DTN has made from the study of data that are deemed pertinent to Subject Component safety and reliability that address the Alleged Defect.
12. List all reports and/or allegations of a field rupture of the Subject Component or Peer Component. For each reported allegation, provide:
- a. Make;
 - b. Model;
 - c. Model Year;
 - d. Vehicle identification number (17-character VIN);
 - e. Geographical location;
 - f. Vehicle build date;

- g. DTN manufacturing plant (Name and Location);
- h. DTN manufacturing line;
- i. Module position;
- j. Inflator serial number;
- k. Inflator build date;
- l. Inflator type;
- m. Incident date;
- n. Description of incident;
- o. Injury (Yes/No);
- p. Fatal (Yes/No); and
- q. Description of injuries.

13. For all field ruptures of the Subject or Peer Component listed in Request 12, provide a detailed summary of DTN's analysis of the incident including DTN's theory of the root cause of the rupture with supporting evidence. Provide copies of all documents related to the analysis and conclusion of root cause of the rupture including, but not limited to, all presentations and reports, internal and external.

Legal Authority for This Request

This letter is being sent to DTN pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports. It constitutes a new request for information.

Civil Penalties

DTN failure to respond promptly and fully to this letter could subject DTN to Civil Penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, 49 U.S.C. § 30165(a)(3), provides for Civil Penalties of up to \$27,874 per violation per day, with a maximum of \$139,356,994 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 C.F.R. § 578.6(a)(3). This includes failing to respond completely, accurately, or in a timely manner to ODI information requests.

If DTN cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney client, attorney work product, or other privilege, DTN does not submit one or more requested documents or items of information in response to this information request, DTN must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

If DTN's response contains any information that you claim is confidential business information (CBI), you will need to upload a "confidential version" file and a redacted "public version" file of each file for which DTN is requesting confidential treatment to NHTSA's Safety Defect Investigations (SDI) Portal. For each file submitted through the SDI Portal for which DTN is requesting confidential treatment, DTN must check the "Contains

CBI" box. Once all DTN's files have been uploaded in the SDI Portal, DTN will need to click on the "Finalize CBI Submission" button in the SDI Portal and then submit its request letter for confidential treatment and Part 512 certification directly to the Office of the Chief Counsel in NHTSA's Confidential Business Information (CBI) Portal.

After DTN submits its request for confidential treatment and certificate in NHTSA's CBI Portal, the CBI Portal will assign a package identification number for your future reference and all "confidential version" and "public version" files submitted as part of the CBI request will be accessible by both NHTSA's Office of the Chief Counsel and NHTSA's Office of Defects Investigation.

Please refer to EA25005 in DTN's response to this letter and in any request for confidential treatment that DTN may submit in response to this letter.

Please see enclosure 1 for additional instructions on submitting a request for confidential treatment that is compliant with 49 CFR Part 512 (specifically, a request for confidential treatment must include the required parts that are discussed in enclosure 1).

Due Date

DTN's response to this letter must be submitted to this office by February 3, 2026. If DTN finds that it is unable to provide all of the information requested within the time allotted, DTN must request an extension from me through the Safety Defects Investigation Portal no later than five business days before the response due date. If DTN is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information DTN then has available, even if an extension has been granted.

If you have any technical questions concerning this matter, please email Pedro Bonilla of my staff at pedro.bonilla@dot.gov.

Sincerely,

Tanya Topka

Tanya Topka, Director
Office of Defects Investigation

ENCLOSURE 1 - INFORMATION FOR REQUESTS FOR CONFIDENTIAL TREATMENT

If you believe that your response contains any material that you claim is confidential business information, submit these materials to NHTSA's Office of the Chief Counsel in accordance with 49 C.F.R. Part 512. **All requests for confidential treatment should be submitted directly to the Office of the Chief Counsel via NHTSA's Confidential Business Information (CBI) Portal. If you do not currently have a user account in the CBI Portal, you may send a registration request to the CBI Portal's Help Desk at cbi-helpdesk@dot.gov.**

Prior to directly submitting your request for confidential treatment to the Office of the Chief Counsel in the CBI Portal, you will need to upload all "confidential version" and "public version" files in NHTSA's Safety Defect Investigations (SDI) Portal.

Requests for confidential treatment are governed by Part 512. A current version of this regulation is available on the internet at <http://www.ecfr.gov> by selecting Title 49 "Transportation," next selecting "Parts 500 - 599," and finally selecting Part 512 "Confidential Business Information."

How to request confidential treatment:

NHTSA is treating electronic submission as an acceptable method for submitting confidential business information to the agency under Part 512. If you claim that any of the information or documents provided in your response constitutes confidential business information within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, you must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with Part 512, to the Office of the Chief Counsel. Requests for confidential treatment should be submitted to the Office of the Chief Counsel in NHTSA's CBI Portal. Do not send a hardcopy of a request for confidential treatment to NHTSA's headquarters.

Your request must include a request letter that contains supporting information, pursuant to Part 512.8. Your request must also include a certificate, pursuant to Part 512.4(b) and Part 512, Appendix A.

You are required to submit one unredacted "confidential version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.6, the words "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS" (as applicable) must appear at the top of each page containing information claimed to be confidential. In the latter situation, where not all information on the page is claimed to be confidential, identify each item of information for which confidentiality is requested within brackets: "[]."

You are also required to submit one redacted "public version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.5(a)(2), the redacted "public version" should include redactions of any information for which you are seeking confidential treatment (i.e., the only information that should be unredacted is information for which you are not seeking confidential treatment).

For questions about a request for confidential treatment, please contact Dan Rabinovitz in the Office of the Chief Counsel at Daniel.Rabinovitz@dot.gov.

Enclosure 2, The subject reports referenced in the introduction of this letter may be viewed at the NHTSA.gov website using the following ODI reference numbers: 11527380, 11558832, 11640919.