

March 6, 2026

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: Second 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 has received DTN's partial response to the initial information request letter sent on December 23, 2025. After review of the responses, ODI is requesting additional information from DTN to further its investigation of the potential risk of a deployment-related field rupture of DTN air bag inflators.

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

- **Subject Component:** Driver air bag inflators (gas generators) manufactured by DTN
- **Alleged Defect:** DTN air bag inflator (gas generator) 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 unit 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. State whether DTN has ever sold air bag inflators to purchasers in the United States. If yes, provide the dates of all such sales, the model numbers of the inflators and the quantity of each inflator sold.
2. State whether DTN has ever sold air bag inflators to purchasers outside the United States who, to DTN's knowledge, then sold those inflators to a person or entity within the United States. If so, provide the name of the company that purchased the inflators from DTN and the name of the company in the United States that the inflators were sold to (if known).
3. Explain why DTN decided to stop selling products to purchasers in the United States.
4. With respect to the air bag inflator manufactured by DTN that uses the model number or other identifier of DTN60DB:¹

¹ An example of an inflator using the identifier of DTN60DB is shown below:



- a. Provide the dates that DTN produced the DTN60DB inflator.
 - b. Identify the propellant(s) used in the DTN60DB inflator. If more than one propellant was used, identify the timeframes that each propellant was used and the reason(s) for the change.
 - c. Identify any design changes to the inflator housing, the time of each design change(s), and the reason(s) for each design change.
 - d. If DTN no longer produces the DTN60DB inflator, provide the reason(s) that the inflator was discontinued.
 - e. Provide design drawings of the DTN60DB inflator.
 - f. Has DTN conducted testing of the DTN60DB inflator? If so, provide the test procedures and test results.
 - g. Is DTN aware of any field or testing failures of the DTN60DB inflator? If yes, list each known failure and any identified or suspected cause.
 - h. State whether DTN ever sold any DTN60DB inflator to a purchaser(s) in the United States. If yes, provide a list of every purchaser in the United States, contact information for the purchase, the date(s) of purchase, and the quantity of inflators purchased.
 - i. Identify all vehicle makes and models the DTN60DB inflators were designed for.
5. List all air bag inflator models produced by DTN from January 1, 2017, to present.

For example: DTN60H-3, DTN60DB

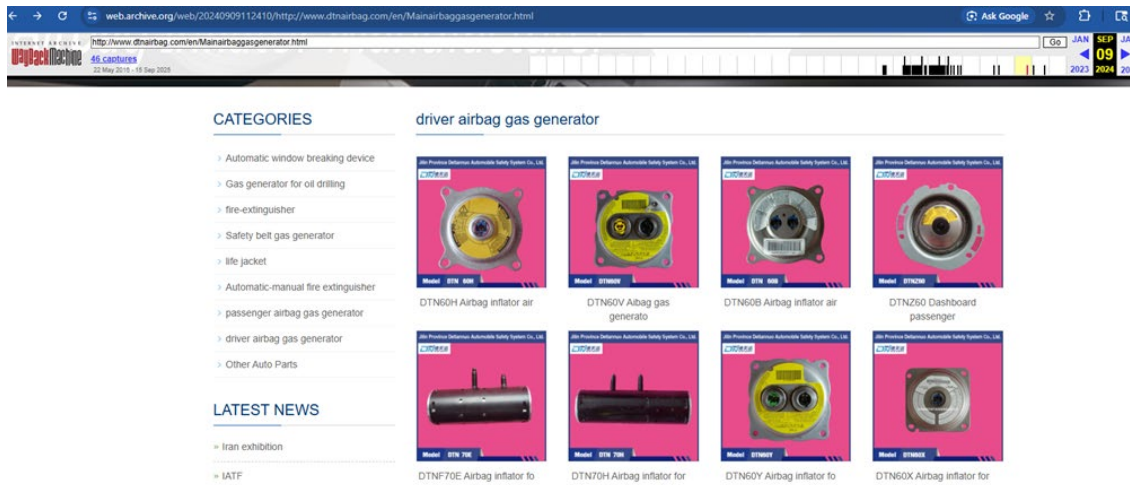
6. Identify the number of inflators produced by calendar year for each model identified in Request 1.

For example: DTN60H-3 (2017: “number produced,” 2018: “number produced,” 2019: “number produced”)

7. Describe how DTN chooses an inflator model number. What does each number and letter indicate?

For example: 60DB, 60B, 60H, 60S.

8. In your response dated February 2, 2026, you state that DTN's inflators are not marketed for automotive airbags. The below screen capture of the DTN web site dated in 2024 advertises many automotive airbag gas generators. Based on this information, when did DTN change the listings from "driver airbag gas generator" to "L gas generators"?



9. When did DTN add the website notice "We do not do business with the United States..." referenced in the screen capture below?

We do not do business with the United States,
and any of our products are prohibited from
being sold to the United States.

Gas generators are dangerous. You must
undergo rigorous experiments and tests
before use and installation.

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's 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 CFR § 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 March 23, 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.

A handwritten signature in black ink that reads "Tanya Topka". The script is cursive and fluid.

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.