



York, Bruce <bruce.york@dot.gov>

RE: DTN research

1 message

York, Bruce (NHTSA) <Bruce.York@dot.gov>

Mon, Jan 5, 2026 at 3:27 PM

To: "bwilliams@teamwisat.com" <bwilliams@teamwisat.com>

Cc: Katherine DiMeglio <KDiMeglio@forthepeople.com> [REDACTED] "Bonilla, Pedro (NHTSA)" <pedro.bonilla@dot.gov>

Hi Bill,

Thanks very much for sharing your thoughts on the Chinese airbag inflator issue. I agree that the market for Chinese sub-standard inflators are those companies counterfeiting the module assembly.

I also believe there are multiple Chinese companies that manufacture sub-standard airbag inflators:

Jilin Province Detiannuo Safety Technology Co., Ltd.

Jiaxing Huaxing Environmental Protection Technology Co., Ltd.

Guangzhou Jashine Technology Co., Ltd.

Guangzhou I-Pack Auto Parts Co., Ltd

Yoshiyayashi Toku theanol Automotive Safety Systems Co. Ltd

As far as predicting future rupture events, I think the estimate would be close to a wild guess as many of the factors cannot be determined.

Regarding th [REDACTED] case, you mentioned you have identified the supplier of the module. Can you please share that information with us?

Thank You,

**Bruce York**Division Chief
Office of Defects Investigation**Department of Transportation****National Highway Traffic Safety Administration**

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From: [REDACTED]
Sent: Friday, December 19, 2025 9:55 AM
To: York, Bruce (NHTSA) <Bruce.York@dot.gov>; Bonilla, Pedro (NHTSA) <pedro.bonilla@dot.gov>
Cc: Katherine DiMeglio <KDiMeglio@ForThePeople.com> [REDACTED]
Subject: FW: DTN research

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Bruce—

Please see below additional analysis from my consulting expert. I believe it's very helpful.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: bwilliams@teamwisat.com <bwilliams@teamwisat.com>
Sent: Friday, December 19, 2025 9:40 AM
[REDACTED]
Subject: RE: DTN research

[REDACTED]

Here is my current working theory on the issue of the Malibu and Hyundai counterfeit inflators:

- a. The counterfeit airbag market is based on the availability of counterfeit modules being available not inflators. The only market for counterfeit inflators are those companies counterfeiting the module assembly minus the inflator. These companies seek out low-cost inflator suppliers to complete their product. The [REDACTED] inspection provided key information that allowed us to identify one counterfeit module supplier that is providing products in the US. While we have not identified the Chinese source company, we have identified several US suppliers that could possibly provide information on the source of their products. It is important to note the counterfeit modules we obtained from the US supplier are not supplied with the DTN60BD inflator. Based on the similarities between the [REDACTED] module components and the two counterfeit modules we purchased it is quite possible that the Chinese source company uses more than one inflator supplier so it could be the supplier of some of the field rupture counterfeit Malibu inflators. It is also as likely that there is at least one other Chinese supplier of counterfeit Malibu modules equipped with DTN60DB inflators.
- b. In determining whether the current field rupture counts for the Malibu and Sonata are low or high several factors have to be taken into account. The process of estimating the number of expected field ruptures with these DTN60DB inflators would have the same methodology that has been used in predicting potential inflator ruptures of other inflators – namely the Takata PSAN family of inflators. This methodology has also been used to estimate the potential for future ARC inflator ruptures. The process considers the following factors in predicting future ruptures:
 - i. Total registered vehicles
 - ii. Abandonment Rate
 - iii. Accident rate
 - iv. Percent of accidents with driver side airbag deployment
 - v. Rupture rate based on testing assigned to result of iv
- c. In order to use this process to get an idea of the number of expected counterfeit Malibu modules equipped with DTN60DB modules that might rupture we have to add in several other factors. Here is a revised version with those factors added:
 - i. Total registered Malibus
 - ii. Abandonment Rate
 - iii. **How many have been in a previous accident**
 - iv. **How many of those in a previous accident had driver side airbag deployment**
 - v. **How many of those were repaired and put back on the road**
 - vi. **Of those repaired how many of those had a counterfeit driver module installed**
 - vii. **Of the counterfeit driver modules installed how many were DTN60DB**
 - viii. Of the vehicles put back on the road with DTN60DB driver module how many will be in a future accident (Accident rate applied to specific population)
 - ix. Of the vehicles put back on the road with DTN60DB driver module that are predicted to be in a future accident how many of those accidents involve deployment of the driver airbag? (Percent of accidents with driver side airbag

deployment applied to those repaired with DTN60DB inflators which were in an accident that was the type that would deploy the driver airbag)

- d. If you would like we can run this risk analysis and get a prediction for you, but you can see after applying all the filters that the number of potential counterfeit modules with DTN60DB inflators is going to be a small number. According to NHTSA there are now 6 Malibu DTN60DB field ruptures. It is my belief that the actual rupture rate for these inflators will be at or very near 100%. A good comparison to be made would be to look at the ARC field ruptures. The current count for field ruptures of the ARC inflators is around 10. The key number here is the base population – there were 60 million ARC inflators installed and to date only 10 have ruptured. Now I did not apply all the filters in “b.” above but it won’t change the fact that the rupture rate is extremely low. But here we are with ONE vehicle covering 2016 to 2022 and we have 6 field ruptures. If we apply the filters in “c.” above the number of Malibus with counterfeit modules equipped with a DTN60DB inflator that have been in an accident where the driver airbag deployed it will be a very small subset of the total population, yet we have 6 field ruptures.
- e. Now NHTSA may suspect that DTN inflators are installed in other manufacturers vehicles. While it may be true that there are counterfeit modules that utilize one of the other DTN variety of inflator I think there is less chance that there are many more using the DTN60DB. The basis for that is:
 - i. If you accept that the DTN60DB inflators have an extremely high rupture rate that appears to be independent of the vehicle platform then it would be more likely than not there would have been field ruptures any other make/models equipped with the DTN60DB inflator involved in frontal collisions where the driver airbag deploys. To date the only models this has occurred in are the Malibu and the Sonata.
 - ii. Based on our research it appears the counterfeit airbag module market caters to a small subset of the available makes/models on the road today. If you look at the various seizures that show the confiscated modules, they usually represent a few manufacturers and of those only a few models. This is apparent in the company we identified that is currently marketing a counterfeit Malibu airbag module. Their product offering is very shallow, around 26 when you remove duplicates.

I would be glad to join in your discussions with NHTSA and be of help any way you see fit. If you have questions let me know.

Bill

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