

Response to
PE25-005

INTRODUCTION

In responding to this Information Request ("IR"), information has been obtained from those places within Nissan North America, Inc. ("Nissan") likely to contain such information in the regular and ordinary course of business. When a particular Request seeks "documents" as defined in the IR, reasonable, good faith searches have also been made of corporate records that are likely to contain responsive information in those places where such records are likely to be found. We have not checked such documents as "calendars", "appointment books", "financial statements" and "personnel records" even though they are included in the definition of "documents" because such documents would not contain owner complaints, field reports, technical analyses or other **information** sought by Requests 2, 5, and 6 pertaining to the Subject Component in the Subject Vehicles. We have also searched for responsive documents and information only with respect to vehicles manufactured for sale in the United States, which we understand to be the scope for which the IR seeks information. Nissan has searched for and produced records that were created through August 7, 2025.

On September 15, 2025, Nissan submitted a partial response to this IR providing information and documents responsive to requests 1-4, and 6. Also on September 15, 2025 via NHTSA's Safety Defect Investigation (SDI) portal, NHTSA granted an extension of time through October 6, 2025 for Nissan to respond to requests 5, 7 & 8 that required additional time for analysis.

Responses are provided after each request, and Attachments are utilized as appropriate. The source of information used as a basis for the data in each Attachment, including the date the data were updated and retrieved, is identified at the beginning of each Attachment, as applicable. If a document itself is the source for the requested information and it is provided, we assume no further source identification is called for. If a document, drawing or component is requested, or if no responsive information is available, we assume no further source identification is called for.

With regard to claims of privilege, Nissan understands that it is acceptable to the Agency for Nissan to identify specific categories of privileged documents rather than any specific document. These specific categories are: 1) communications between outside counsel and Nissan Legal Department employees, other Nissan employees, or other Nissan-represented parties in litigation or claims; 2) communications between Nissan Legal Department employees and other Nissan employees or other Nissan-represented parties in litigation or claims; 3) notes and other work product of outside counsel or of Nissan Legal Department employees concerning communications with Nissan employees or consultants, and the work product of those employees or consultants done for or at the request of outside counsel or Legal Department employees; and 4) other categories to be identified later as necessary. For any privileged documents that are not included in these categories, such documents, if any, will be specifically identified on a separate privilege index at a later time. To the extent that a document is furnished, and unless the production of that document is inadvertent, Nissan is not asserting a privilege claim for that document, although the disclosure of such document does not waive the attorney-client privilege or work-product protection with respect to other documents prepared in connection with the specific litigation or claim or other litigation or claims. In addition, in submitting such documents, we reserve our right to claim the attorney-client privilege and/or work-product protection with respect to analyses that may be prepared subsequently in connection with these and other cases. Also, we understand documents specifically related to the preparation of the responses are not sought.

Nissan believes NHTSA's policy is to protect the privacy of individuals under exemption 6 of the Freedom of Information Act, 5 U.S.C. Section 552(b)(6). We understand that name, address, and other personal information of owners or other individuals, including Nissan personnel, contained in any of the attachments in this response will not be made available to

the public. Therefore, Nissan is not requesting confidential treatment for this information pursuant to 49 CFR Part 512, but we believe any private information concerning individuals should not be made public.

* * * * *

The National Highway Traffic Safety Administration (NHTSA) in its Preliminary Evaluation PE25-005 investigation of allegations of airbag deployment and rupture in certain model year (MY) 2009 Nissan Cube vehicles has requested information from Nissan North America, Inc. ("Nissan"). In regard to NHTSA's questions and requests for PE25-005, NHTSA is seeking information on Subject Vehicles identified as "all 2009 Nissan Cube manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions." The Subject Component has been identified as "all Takata PSDI-X driver airbag inflators equipped on the subject vehicles." NHTSA has specifically requested information related to the Alleged Defect defined as "In the event of a crash, the subject component may deploy abnormally or rupture during a deployment event" which was clarified in a meeting with ODI on August 14, 2025 to be interpreted as crash events in which a commanded airbag deployment resulted in unexpected performance.

1. State, by model and model year, the number of subject vehicles Nissan has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Nissan, state the following:
 - a. Vehicle identification number (17-character VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Subject component part number and design version installed as original equipment;
 - f. Date of manufacture (MM/DD/YYYY);
 - g. Airbag module assembly identification number;
 - h. Date of airbag module assembly application to vehicle (MM/DD/YYYY);
 - i. Date warranty coverage commenced (MM/DD/YYYY); and
 - j. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

Table 1. Production Data Summary

MAKE	MODEL	2009 Model Year
Nissan	Cube	28,388

The information requested in 1.a through 1.j, when known, was previously uploaded to the NHTSA SDI Portal as Attachment A in a Microsoft Access database titled "PE25-005_DATA" that contains a table titled "PRODUCTION_DATA."

2. State the number of each of the following, received by Nissan, or of which Nissan is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;

- c. Reports or claims involving a crash, airbag deployment, airbag inflator rupture allegation, fire, injury or fatality;
- d. Property damage claims;
- e. Third-party arbitration proceedings, both pending and closed, where Nissan is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Nissan is or was a defendant or codefendant.

For subparts "a" through "f" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f" provide a summary description of the alleged problem and causal and contributing factors and Nissan's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

- a. Consumer complaints, including those from fleet operators;

Table 2. Consumer Complaints Summary

Make	MY/Model	Total Consumer Complaints
Nissan	2009 Cube	0

- b. Field reports, including dealer field reports;

Table 3. Field Reports Summary

Make	MY/Model	Total Field Reports
Nissan	2009 Cube	0

- c. Reports or claims involving a crash, airbag deployment, airbag inflator rupture allegation, fire, injury or fatality;

Table 4. Crash, Injury & Fatality Reports or Claims

Make	MY/Model	Total Reports of All Crashes	Total Reports of All Airbag Deployments	Total Reports of All Airbag Inflator Rupture Allegations	Total Reported Fires	Total Reported Injuries	Total Reported Fatalities
Nissan	2009 Cube	1	1	1	0	1	0

Nissan found one (1) report involving a crash with an airbag deployment and an alleged inflator rupture with 1 injury.

Nissan is not aware of any reports involving Subject Vehicles and the Subject Component's Alleged Defect involving a fire or fatality.

d. Property damage claims;

NNA found zero (0) reports of property damage claims relating to the Subject Component in the Subject Vehicles.

e. Third-party arbitration proceedings, both pending and closed, where Nissan is or was a party to the arbitration; and

Nissan found zero (0) third party arbitration proceedings where Nissan is or was a party to the arbitration, which relate to, or may relate to, the Subject Component in the Subject Vehicles.

f. Lawsuits, both pending and closed, in which Nissan is or was a defendant or codefendant.

Table 5. Lawsuits

Make	MY/Model	Total Lawsuits
Nissan	2009 Cube	0

Nissan found zero (0) lawsuits in which Nissan is or was a defendant or co-defendant, which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.

A summary description of one (1) crash (which included one (1) injury) was previously uploaded to the NHTSA SDI Portal as CONFIDENTIAL Attachment B in a folder titled "REQUEST NUMBER 2 DOCUMENTS" stored as an Adobe pdf file titled "CBI - REQUEST_NUMBER_2.C_SUMMARY."

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. Nissan's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
 - d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
 - e. Vehicle's 17-character VIN;
 - f. Vehicle's make, model, and model year (please use distinct fields for each data type);
 - g. Vehicle's mileage at time of incident (numeric data type);
 - h. Incident date (MM/DD/YYYY);
 - i. Report or claim date (MM/DD/YYYY);

- j. Whether a crash is alleged;
- k. Whether a fire is alleged;
- l. Whether a front driver airbag deployment is alleged;
- m. Whether a front driver airbag module assembly failed to deploy as designed;
- n. Whether a front driver airbag inflator failed to operate as designed;
- o. Whether property damage is alleged;
- p. Number of alleged injuries, if any; and
- q. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

The information available to Nissan requested in 3a through 3q, when known, was previously uploaded to the NHTSA SDI Portal as Attachment A in a Microsoft Access database titled "PE25-005_DATA" which contains a table titled "REQUEST_NUMBER_TWO_DATA."

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Nissan used for organizing the documents. Describe in detail the search methods and search criteria used by Nissan to identify the items in response to Request No. 2.

Documents requested within the scope of "Request No. 2" were previously uploaded to the NHTSA SDI Portal as Attachment A in a folder titled "REQUEST NUMBER 2 DOCUMENTS". The documents are organized by category and stored as Adobe pdf files.

The search criteria used by Nissan to identify the documents in response to "Request No. 2" are set forth below.

Nissan searched for all documents related to Production Code Z12 (Cube) with model year equal to 2009 that contained the following words (case insensitive). Commas below represent an "OR" statement.

- crash, accident, wreck, collision, fender bender, impact, explode, shrapnel, rupture
AND
- air bag, airbag, inflator

The documents must also have been opened/created on or before August 7, 2025.

Nissan manually reviewed all the resulting documents and is reporting those relevant to this investigation.

For litigation and claim files, data submitted in response to Request 2 was gathered from relevant databases on August 18, 2025. The search criteria used by Nissan to identify the matters identified in response to Request No. 2 is as follows:

- Model/Model Year: MY09 Nissan Cube
AND
- TREAD Code 14
AND
- Alleged Failure Mode: Improper Deployment

The resulting data was then reviewed for relevancy and Nissan previously reported the

claim responsive to this request.

5. List all past, currently active, and/or any planned testing and analysis activities conducted/being conducted/to be conducted by or on behalf of Nissan of the subject component. Separately, for each testing and analysis activity conducted to date, provide the following information.
 - a. Activity title or identifier;
 - b. A brief summary of the subject and objective of the action;
 - c. The actual or planned start date;
 - d. The actual or expected end date;
 - e. All parties, including third parties, involved with the identified testing activity.
 - i. A description of each party's role in the identified testing activity.
 - f. All field collection activity(s) associated with each testing activity.
 - i. The targeted number of inflators to be collected;
 - ii. The number of inflators currently in the possession of or on behalf of Nissan;
 - g. Details on laboratory testing associated with each testing activity, including but not limited to:
 - i. Use of field collected or specifically prepared (not production units) inflators;
 - ii. All dissection and internal inflator component analysis;
 - iii. All ballistic testing including any propellant burn rate analysis;
 - iv. All accelerated exposure testing (e.g., chamber cycling);
 - v. All hydroburst testing;
 - vi. All controlled field exposure testing (e.g., parking lot exposure); and
 - h. Any interim or final reports/results generated from the testing activity.
 - i. A brief summary of the findings and/or conclusions resulting from the action.

For each activity identified, provide copies of all documents related to the activity, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Via email on September 18, 2025 NHTSA's ODI informed Nissan that for the purposes of this investigation, this request relates to testing conducted by or on behalf of Nissan that involved welds on any model year 2009 Nissan Cube PSDI-X inflator; therefore, Nissan is not submitting testing conducted by Takata related to internal production quality.

The non-privileged information available to Nissan requested in 5.a through 5.i, when known, is being uploaded to the NHTSA SDI portal in the Q5 folder for PE25-005 in an Adobe Acrobat file titled "REQUEST NUMBER 5 RESPONSE_CBI."

Nissan previously submitted reports in compliance with the SGO. Additional non-privileged documents available to Nissan and requested within the scope of Request No. 5 are being uploaded to the NHTSA SDI portal in the Q5 folder for PE25-005 in a file folder titled "REQUEST NUMBER 5 DOCUMENTS_CBI."

6. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Nissan has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Nissan is planning to issue within the next 180 days.

Copies of documents Nissan has issued to dealers, regional or zone offices, field offices, fleet purchasers, or other entities relating to study of the potential for the

Alleged Defect in the Subject Component were previously uploaded to the NHTSA SDI Portal as Attachment A in a folder titled "REQUEST NUMBER 6 DOCUMENTS." These documents were not related to a collection of parts to investigate weld issues within the Subject Component but rather as part of a different collection effort to support industry studies of Takata inflators, which results have previously been reported to NHTSA ([Summary of the TK Global Report on Takata Desiccated PSAN Inflator Study](#) and [PSAN Inflator Test Program and Predictive Aging Model Final Report](#)). There was no inspection of welds done with the parts collected from these efforts.

Nissan does not currently have a draft copy of any communication to dealers, regional or zone offices, field offices, fleet purchasers, or other entities that relate to, or may relate to, the Alleged Defect in the Subject Vehicles which it plans to issue within the next 180 days.

7. Provide Furnish Nissan's assessment of the alleged defect in the subject vehicles, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses; and
 - e. The reports included with this inquiry.

Nissan continues to investigate a single incident that matches the Alleged Defect in the Subject Component of the Subject Vehicles and at this time does not believe it poses an unreasonable risk to safety.

Investigation of this incident has determined the root cause in the incident vehicle to be an improper body bore seal laser weld. The main contributing condition to this failure was a significant lack of fusion in the weld at the body bore seal, with a crack initiating at the body bore seal weld and propagating in either direction. There is no evidence that propellant degradation or steel properties contributed to this event in any way.

Metallographic analysis of the failed weld indicated less than 20% of the target minimum fusion, making the weld at this location considerably weakened. The poor fusion and oxide in the welds were the only deleterious conditions observed. The chemistry, hardness, and microstructural constituents observed did not display significantly deleterious conditions, let alone any of the same magnitude as the lack of fusion observed.

The poor condition of the weld is likely attributed to the inflator being misaligned in the welding nest, which resulted in improper positioning of the weld joints relative to the laser beam. This misalignment is not believed to be a systematic issue with the weld station. Because weld seam analysis and inflator functional tests were routinely conducted by the supplier during a production run, any systematic issue with the weld station would have likely been caught and isolated at the time of manufacture.

With respect to the vehicle population as a whole, Subject Vehicles have accumulated more than 446,000 cumulative years in service (YIS) and, according to NHTSA's DOT HS 809 952 Vehicle Survivability and Travel Mileage Schedule, an estimated 5 billion vehicle miles travelled. This data indicates a very high exposure, again, with only a single incident to have been found in the field.

Although exposure is high, Nissan does not believe that exposure is a critical path to the failure found in the incident vehicle. As previously mentioned, the investigation of the incident vehicle's parts provided no evidence that propellant degradation or steel properties contributed to the incident. Therefore, Nissan also believes that if the incident

vehicle had a commanded airbag deployment shortly after being placed in service as opposed to later in the vehicle's service life, a similar outcome may have occurred for this incident inflator.

Regarding vehicle survivability, the average age of the Subject Vehicle population on 8/7/2025 is 15.8 YIS with a minimum of 13.4 YIS and a maximum of 17.2 YIS. Using the average of 15.8 YIS it is estimated, once again using DOT HS 809 952 data, that 27.5% of the 28,388 Subject Vehicle population remains in service (approximately 7,700 vehicles). As of December 31, 2025, the estimated survival population reduces to 25% (7,100 vehicles) further reducing to 19.4% by 12/31/2026 (5,500 vehicles).

As the population of Subject Vehicles has already decreased to an estimated 7,700 vehicles remaining in service, it is likely that some significant portion of the vehicles currently out of service were also involved in an airbag deployment incident which did not result in an inflator rupture.

Nissan is currently working with the supplier to identify inflators that could constitute a potential range of inflator parts for further study. Given the age of the vehicles and the nature of the production records, this has been challenging and is taking time to coordinate. Further study on a smaller band of production, potentially via collection of parts, is under consideration.

Nissan will continue to investigate the one known incident, study available records related to PSDI-X inflators installed on Subject Vehicles, monitor the field for other similar incidents, and report back to the agency as appropriate.

8. For any subject vehicle identified in response to Requests No. 1, state whether you have or are developing a program to replace the inflators in subject vehicles. If yes, identify for which subject vehicle build dates, the status of the program, and projected completion of each program.

As mentioned in Nissan's response to Request 7, Nissan continues to investigate a single incident matching the Alleged Defect in the Subject Component of the Subject Vehicles and at this time does not believe it poses an unreasonable risk to safety.

At this time, Nissan has not determined any need to develop a program to replace inflators in Subject Vehicles in connection with the weld issues observed in the incident inflator.

Nissan will continue to investigate the one known incident involving a MY2009 Cube, study available records related to PSDI-X inflators installed on Subject Vehicles, monitor the field for other similar incidents, report back to the agency, and take any appropriate actions.

* * * * *