

March 06, 2026

Peter Kivett
Office of Defects Investigation
National Highway Traffic Safety Administration
W48-312, NEF-104
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr Kivett:

Subject: **JLR Response to PE25-019**

JAGUAR LAND ROVER RESPONSE TO PE25-019

This is the JLR's updated response to the Preliminary Evaluation Information Request in PE25-019. The updates are limited to JLR's response to question 20.

The Information Request received on January 06, 2026, informs JLR that ODI is investigating an allegation of a rear row seat belt detachment due to improperly formed stitching. in certain Model Year (MY) 2024 Land Rover Defender vehicles manufactured by Jaguar Land Rover (JLR), and to request certain information from JLR.

For the investigation, the alleged defect being investigated is "rear row seat belt webbing detaching due to improperly formed stitching." as provided in the definitions of the Agency's letter of January 6, 2026. We have applied this definition in our efforts to respond to this Information Request; however, documents submitted in support of our response may mention other parts of the vehicle and/or other vehicle systems.

Where supporting evidence is supplied to answer a specific question, this is provided in appendices aligned to the specific question being responded to. If the same evidence supports two or more question responses, it will be duplicated in the corresponding appendices, to aid clarity for the reader in understanding the response.

The JLR response to this Preliminary Evaluation information request was prepared pursuant to a diligent search for the information requested.

The scope of JLR's investigation conducted to locate responsive information focused on JLR employees most likely to be knowledgeable about the subject matter of this inquiry and on review of JLR files in which responsive information ordinarily would be expected to be found and to which JLR ordinarily would refer. JLR notes that although electronic information was included within the scope of its search, JLR has not attempted to retrieve from computer storage electronic files that were overwritten or deleted. As the agency is aware, such files generally are unavailable to the computer user even if they still exist and are retrievable through expert means. To the extent that the agency's definition of JLR includes suppliers, contractors and affiliated enterprises for which JLR does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in JLR's possession, custody or control.

JLR has construed this request as pertaining to vehicles manufactured for sale in the United States and federalized territories.

JLR notes that some of the information being produced pursuant to this inquiry may contain personal information such as customer names, addresses, telephone numbers, and complete Vehicle Identification Numbers (VINs). JLR is producing such personal information in an unredacted form to facilitate the agency's investigation with the understanding that the agency will not make such personal information available to the public under FOIA Exemption, 5 U.S.C. 552(b)(4) and (6).

Answers to your specific questions are set forth below. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, JLR has undertaken to provide responsive documents dated up to and including January 6, 2026, the date of your inquiry. JLR has searched within the following Jaguar Land Rover offices for responsive documents: Product Compliance Office, Purchasing, Marketing Sales and Service, Quality, Office of the General Counsel, Vehicle Operations, and Product Engineering.

Question 1. State, by model and model year, the number of Subject and Peer Vehicles JLR has manufactured for sale or lease in the United States. Separately, for each Subject and Peer Vehicle manufactured to date by JLR, 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(s) installed as original equipment;
- f. Date of manufacture (MM/DD/YYYY);
- g. Date warranty coverage commenced (MM/DD/YYYY);
- h. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation);
- i. Trim level; and
- j. Seating configuration.

Response:

JLR records indicate that the approximate total number of vehicles subject and peer through manufactured for sale in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is eighty four thousand and eighty eight (84,088).

The data tabulated below covers Jaguar Land Rover vehicles built for sale in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands), broken down by model

Vehicle Line	Volume
Defender (L663)	29,687
Land Rover Discovery (L462)	4,140
Land Rover Discovery Sport (L550)	2,856
Jaguar F-Pace (x761)	5,605
Range Rover (L460)	16,623
Range Rover Sport (L461)	19,441

Range Rover Velar (L550)	5,736
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File "PRODUCTION DATA.xlsx" lists the requested vehicle information for the subject and peer vehicles.

Question 2. State the number of each of the following, received by JLR, or of which JLR is otherwise aware, which relate to, or may relate to, the Alleged Defect in the Subject and Peer Vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury or fatality;
- d. Property damage claims; and³
- e. Third-party arbitration proceedings, both pending and closed, where JLR is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which JLR is or was a defendant or co-defendant.

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 JLR'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.

Response:

The following summary includes all known data, with the multiple reports of the same incident, shown separately;

	Defender (L663)	Discovery (L462)	Discovery Sport (L550)	F-Pace (X761)	Range Rover (L460)	Range Rover Sport (L461)	Range Rover Velar (L560)
a) Consumer Complaints	1*	0	0	0	0	0	0
b) Field Reports	0**	0	0	0	0	0	0
c) Crash / Injury / Fatality	0	0	0	0	0	0	0
d) Property Damage	0	0	0	0	0	0	0
e) 3rd party Arbitration	0	0	0	0	0	0	0
f) Lawsuits	0	0	0	0	0	0	0

NOTE: The field report and consumer complaint for Defender (L663) refer to the same incident on the same vehicle.

* this is the VOQ received from NHTSA

** this is the warranty claim received by JLR

Question 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. JLR'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 identification number (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 property damage is alleged;
- l. Number of alleged injuries, if any;
- m. Number of alleged fatalities if any; and
- n. Which seating position(s) experienced the Alleged Defect.

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

RESPONSE;

JLR records were searched and reviewed for relevance in relation to the alleged defect for both subject and peer vehicles. File "REQUEST NUMBER TWO DATA.xlsx" refers.

Question 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 JLR used for organizing the documents. Describe in detail the search methods and search criteria used by JLR to identify the items in response to Request No. 2.

RESPONSE;

JLR researched Concern Driven Reporting/Enhanced Concern Identification (CDR/ECI) and Global Concerns Management (GCM) systems and a review of the warranty claim system. Searches were conducted across all subject and peer vehicles using the base part numbers for the seat belts and then the following terms:

Stitch, thread, sew, loose, apart

This research generated two documents, one of which was previously shared by NHTSA with JLR.

"VOQ 11678273.pdf"

"Warranty Claim 75579360.pdf"

Both documents relate to the same single vehicle incident.

Question 5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by JLR to date that relate to, or may relate to, the Alleged Defect in the Subject and Peer Vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. JLR's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
- c. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
- d. Vehicle identification number (17-character VIN);
- e. Repair date (MM/DD/YYYY);
- f. Vehicle mileage at time of repair (numeric data type);
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);
- h. Labor operation number(s);
- i. Problem code(s);
- j. Diagnostic trouble code(s);
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer;
- m. Cause as stated on the repair order;
- n. Correction as stated on the repair order;
- o. Additional comments, if any, by dealer/technician relating to claim and/or repair; and
- p. Which seating position(s) experienced the Alleged Defect.

RESPONSE;

File "WARRANTY DATA.xlsx" contains the response to the question 5 request.

The exception to this is item 'J', relating to DTC's. Since this topic is a purely mechanical issue, no vehicle based DTC's would be induced due to the alleged defect.

Question 6. Describe in detail the search methods and search criteria used by JLR to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

RESPONSE;

JLR has searched its warranty database for claims for the subject and peer vehicles which relate to, or may relate to, the alleged defect. The information relates to vehicles manufactured for sale or lease in the USA and federalised territories (US, Guam, Puerto Rico, American Samoa, Northern Mariana Islands, US Virgin Isles).

The following search criteria was used:

- Model
- Model Year 2024

- Market
- Engineering Base Part Numbers = '600A38', '611B08', '611B09', '611B68', '611B69', '611E64', '61294', '61295', & '613G72'.

Results were then downloaded to Excel spreadsheets for in-depth analysis, looking for responsive reports. Results were searched, for keywords listed below, to consider each for the occurrence of the alleged defect condition.

Keywords

Stitch, thread, sew, loose, apart

Question 7. Provide a list of all labor operations, labor operation descriptions, problem codes, problem code descriptions, diagnostic trouble codes, and diagnostic trouble code descriptions applicable to the Alleged Defect in the Subject and Peer Vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

RESPONSE;

The following file provides details of labor operations, labor operation descriptions, problem codes and problem code descriptions.

"DEFECT REPORTING CODES.xlsx"

JLR notes that there are no diagnostic trouble codes and diagnostic trouble code descriptions related to this alleged defect as this is a mechanical issue.

Question 8. State, by make and model year, the terms of the new vehicle warranty coverage offered by JLR on the Subject and Peer Vehicles concerning the Subject Component (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that JLR offered for the Subject and Peer Vehicles related to the Subject Component and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

RESPONSE;

The following .pdf files provide details of the terms of the new vehicle warranty coverage offered by JLR on the subject and peer vehicles

"Guide to Warranty Terms and Conditions.pdf"

"JLR_warranty_manual Section A.pdf"

"JLR_warranty_manual Section B (WM - 59435 – extended).pdf"

"JLR_warranty_manual Section Z (WM-59435).pdf"

The data tabulated below covers the JLR subject and peer vehicles with extended warranty coverage:

MODEL	MODEL YEAR	NUMBER OF VEHICLES
Defender (L663)	2024	3132
Range Rover (L460)	2024	1092
Range Rover Sport (L461)	2024	1306
Land Rover Discovery (L462)	2024	1020
Land Rover Discovery Sport (L550)	2024	1375
Range Rover Velar (L560)	2024	1057
Jaguar F-Pace (x761)	2024	1282

Question 9. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the Alleged Defect in the Subject and Peer Vehicles, that JLR 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 JLR is planning to issue within the next 120 days.

RESPONSE;

For purposes of identifying communications to dealers, zone offices, or field offices pertaining, at least in part, to the alleged defect in the subject vehicles, JLR has reviewed the JLR Technical and Owner Publications Information Exchange (TOPIx) website, which is the general repository for all workshop manuals, technical service, and recall communications. In addition, the EPQR database was searched for Special Service Messages. We assume this request does not seek information related to electronic communications to Land Rover or Jaguar dealers regarding the order, delivery, or payment for replacement parts, so we have not included this kind of information in our answer.

This review has shown that there are no service, warranty, or other documents that relate to, or may relate to, the Alleged Defect in the Subject and Peer Vehicles, that JLR has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities.

Question 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 and Peer Vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, JLR. 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.

RESPONSE;

Please see letter "ALV Letter PE25019 20Feb26_CBI.pdf" provided by Autoliv for their response to Question 10.

In addition to Autoliv's response, JLR has raised an investigation and two grey alerts as a result of VOQ 11678273.

Please see file "Question 10 Index_CBI.xlsx" for details

Question 11. Describe all modifications or changes made by, or on behalf of, JLR in the design, material composition, manufacture, quality control, supply, or installation of the Subject Component, from the start of production to date, which relate to, or may relate to, the Alleged Defect in the Subject and Peer Vehicles. 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 vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original components;
- e. The part number(s) (service and engineering) of the modified components;
- f. Whether the original unmodified components were withdrawn from production and/or sale, and if so, when;
- g. When the modified components was made available as a service components; and
- h. Whether the modified components can be interchanged with earlier production components.

Also, provide the above information for any modification or change that JLR is aware of which may be incorporated into vehicle production within the next 120 days.

RESPONSE;

There were no changes requested by, or on behalf of, JLR to the design, material composition, manufacture, quality control, supply, or installation of the Subject Component, which relate to, or may have related to, the Alleged Defect in the Subject and Peer Vehicles.

In addition, there are no planned changes to be requested by, or on behalf of, JLR to the design, material composition, manufacture, quality control, supply, or installation of the Subject Component within the next 120 days that relate to, or may relate to, the Alleged Defect in the Subject and Peer Vehicles.

Please see letter "ALV Letter PE25019 20Feb26_CBI.pdf" provided by Autoliv for their response to Question 11.

Question 12. State the number of each of the following that JLR has sold that may be used in the Subject and Peer Vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

- a. Subject Component;**
- b. Similar or substantially similar components; and**
- c. Any kits that have been released, or developed, by JLR for use in service repairs to the Subject Component.**

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which JLR is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

RESPONSE;

Supplier Contact details:

Razvan Arsene, Vice President Quality, Europe

Razvan.arsene@autoliv.com

+41-79 529 87 46

Autoliv Switzerland

Poststrasse 8

CH-6300 Zug

Switzerland

File "Question 12 – Sales Data.xlsx" shows the breakdown of sales by month and year sold.

The response to question 15 shows the applicable carlines and model years to which the parts can be installed.

Question 13. Describe in detail any and all differences in the design and components for the second and third row seat belt assemblies between the Subject and Peer Vehicles.

RESPONSE;

JLR is wholly reliant on the tier 1 supplier, Autoliv, for this response.

Please see letter "ALV Letter PE25019 20Feb26_CBI.pdf" provided by Autoliv for their response to Question 13.

Question 14. Describe in detail any and all differences between the front row seat belts and the seat belts in the second row and, if applicable, in the third row in the Subject and Peer Vehicles.

RESPONSE;

JLR is wholly reliant on the tier 1 supplier, Autoliv, for this response.

Please see letter "ALV Letter PE25019 20Feb26_CBI.pdf" provided by Autoliv for their response to Question 14.

Question 15. Identify all Tier 1 manufacturers JLR purchases rear row seat belt assemblies from for the purpose of installing them in new vehicle production. For each Tier 1 manufacturer identified, provide the following information in tabular form for the latest three (3) years:

- a. Supplier name;
- b. JLR part number;
- c. Make, model, model year in which seat belt assembly was utilized; and
- d. Position seat belt assembly utilized in (i.e. second row right, third row left).

RESPONSE;

JLR has sought to list out the information requested above for all vehicle manufactured between, and including, January 6, 2023 – January 6, 2026

Please see file "Question 15 Data_CBI.xlsx"

Question 16. For each seat belt assembly identified in Request 15, identify all testing conducted by the supplier to ensure adherence to design and/or performance parameters. In addition, provide all quality control test procedures required by JLR to be performed by the supplier on the seat belt complete assembly as well and individual assembly components.

RESPONSE;

Please see letter "ALV Letter PE25019 20Feb26_CBI.pdf" provided by Autoliv for their response to Question 16.

ZF have confirmed that they follow the testing requirements of JLR alongside their own testing which includes sled testing and tensile strength testing. File "JLR – NHTSA response ZF_CBI.pdf" contains information from ZF.

File "SeatBelt Requirements JLR_CBI.xlsx" shows testing that is required to be conducted by our tier 1 suppliers.

Question 17. For each test identified in Request 16, list each incident where the seat belt assembly failed to meet the test requirements. For each incident provide a copy of the test report and supply the following in tabular form:

- a. Entity conducting test;**
- b. Supplier name;**
- c. Position seat belt assembly tested for (i.e. second row right, third row left);**
- d. Test being conducted at time of failure;**
- e. Failure mechanism;**
- f. Root cause of failure; and**
- g. Countermeasures implemented to reduced future occurrences.**

RESPONSE;

For the tests that are identified in the response to question 16, JLR has not recorded any failures of the tests specified.

Question 18. For each seat belt assembly identified in Request 15, identify all testing conducted by JLR to ensure adherence to design and/or performance parameters of the assembly.

RESPONSE;

The suite of testing conducted by JLR to ensure adherence to design and/or performance parameters of the seat belts assemblies fitted to our vehicles are shown in file "SeatBelt Requirements JLR_CBI.xlsx", tab "BI Seat Belts Req Deck"

Question 19. For each test identified in Request 18, list each incident where the seat belt assembly failed to meet the test requirements. For each incident provide a copy of the test report and supply the following in tabular form:

- a. Entity conducting test;**
- b. Supplier name;**
- c. Position seat belt assembly tested for (i.e. second row right, third row left);**
- d. Test being conducted at time of failure;**
- e. Failure mechanism;**
- f. Root cause of failure; and**
- g. Countermeasures implemented to reduce future occurrences.**

RESPONSE;

For the tests that are identified in the response to question 18, JLR has no recorded incidents where the seat belt assembly failed to meet the test requirements.

Question 20. Furnish JLR's assessment of the Alleged Defect in the Subject and Peer 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. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the Alleged Defect was occurring, or Subject Component was malfunctioning; and**
- f. The reports included with this inquiry.**

RESPONSE;

The following is an updated response to question 20.

The supplier's investigation into the alleged defect identified in VOQ 11678273 is still ongoing. Files "ALV Letter PE25019 20Feb26_CBI.pdf" and "JLRCC4690 VOQ 24MY Defender L663 Seatbelt stitching [REDACTED] - 19.2.26_CBI.pdf" refer to Autoliv's work to date.

The initial conclusion is that the thread on the bobbin has not created a lockstitch with the thread from the top needle. This has given the appearance of a stitched component, without full structural integrity. When the belt was put under significant tension by the customer, the bottom material has pulled away from the top, leaving the top-needle thread in place. Autoliv's conclusions around the failure mechanisms which led to the isolated incident reported in 11678273 are listed in document "JLRCC4690 VOQ 24MY Defender L663 Seatbelt stitching [REDACTED] - 19.2.26_CBI.pdf" attached in response to this PE. Autoliv assert that 5 extra-ordinary individual circumstances must come together simultaneously to produce the final reported condition.

The customer verbatim for VOQ 11678273 implies that the alleged defective seat belt was "not stitched and was not connected to the frame", implying that there was clear warning to this user that the seat belt would not provide the require protection and was detected prior to any safety incident. There are no digital or electronic warnings for this type of mechanical failure.

A seat belt with stitching that is incomplete or missing may detach from the anchor webbing and will not properly restrain the occupant increasing the risk of injury in a crash.

Based on the above, the severity of potential outcome, together with likelihood of further occurrences in the field, JLR's conclusion is that there is no evidence of a pattern or trend of a defect that would affect the safety of its customers in the subject or peer vehicles. It is JLR's current view is that VOQ 11678273 is an isolated incident in a population of approximately 1.3m seatbelts provided to JLR by this supplier globally.

In addition to the above, it is noted that Autoliv are exploring additional methods within their production process to detect this failure mechanism in the future. The exact nature and timing of this is still under development

Autoliv have also informed JLR that there are 29 parts built on the same bobbin run as the warranty return part from VOQ 11678273 that they propose to inspect. Autoliv have provided serial numbers and delivery

batch information to support this proposal. JLR has raised a formal Product Safety & Compliance Committee (PSCC) investigation to and will inform NHTSA of any further actions, learning or information in due course.