

APR 12 10 42 AM '06  
REGISTRATION



06V-116  
2 Pages

Mr. Daniel C. Smith  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, DC 20590

April 10, 2006

Dear Mr. Smith:

Re.: Submission of Part 573 report for 2005 Model Year Mazda TRIBUTE vehicles

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, "Defect and Noncompliance Reports," Mazda North American Operations (MNAO), on behalf of Mazda Motor Corporation of Hiroshima, Japan (Mazda), submits the following information concerning a potential noncompliance to the requirements of Section S6.1(a) of FMVSS201 for certain 2005 model year Mazda TRIBUTE vehicles.

Sec. 573.6 (c)(1):

Mazda Motor Corporation with Designated Agent:

David G. Robertson  
Manager,  
Environmental and Safety Engineering  
Mazda North American Operations  
1500 Enterprise Drive, Allen Park  
Michigan 48101-2053

Sec. 573.6 (c)(2):

Certain Mazda TRIBUTE vehicles manufactured without side air curtains or moon roofs built from Job#1 through March 31, 2005, with the Vehicle Identification Number (VIN) range between 4F2YZ\*\*\*\*5KM00003 and 4F2YZ\*\*\*\*5KM62453, at the Kansas City Assembly Plant are potentially affected.

Sec. 573.6 (c)(3):

Approximately 23,100 vehicles in the United States and federalized territories.

Sec. 573.6 (c)(4):

All of these vehicles are affected.

Sec. 573.6 (c)(5):

A 2005 Ford Escape which has the same body structure and interior components as the 2005 Mazda TRIBUTE was tested by the National Highway Traffic Safety Administration (NHTSA) on November 15, 2005 to the requirements for FMVSS201, Occupant Protection in Interior Impact. The test procedure used by NHTSA resulted in a Head Injury Criterion (HIC) value of 1077 at the AP1 target, located on the headliner near the A-pillar/roof rail on the left hand side of the vehicle. The regulatory requirement is 1000. Due to the similarities with the 2005 MY Ford Escape this test result is also applicable to the 2005 MY Mazda TRIBUTE.

Sec. 573.6 (c)(6):

Not Applicable

Sec. 573.6 (c)(7):

A 2005 Ford Escape which has the same body structure and interior components as the 2005 Mazda TRIBUTE was tested by the National Highway Traffic Safety Administration (NHTSA) on November 15, 2005, to the requirements of FMVSS 201, Occupant Protection in Interior Impact. The Head Injury Criterion (HIC) calculation result at target AP1, located on the A-pillar/roof rail on the left hand side of the vehicle was in excess of the regulatory requirement of 1000 HIC(d). On February 8, 2006, Ford Motor Company (Ford), which has development responsibility both of Ford Escape and Mazda TRIBUTE, conducted a test on the left hand side AP1 target to test parameters used by NHTSA in the November 15, 2005, test and produced HIC(d) results in excess of the values allowed by standard 201. Results were HIC(d) 1081. The right hand side AP1 was also tested to the test parameters used by NHTSA in the November 15, 2005, test and the results were HIC(d) 990. Ford conducted extensive testing in its good faith determination of compliance to the requirement, and that testing demonstrated a significant compliance margin. Ford believes that the result obtained by NHTSA versus the results obtained in the many Ford tests demonstrates the appropriateness of the comments made by the Alliance of Automobile Manufacturers that questioned the objectivity and practicability of the rule because of the infinite number of test conditions possible, as a result of the wide range of possible horizontal and vertical approach angles. Nonetheless, Ford is conducting the actions to avoid a protracted dispute with the agency and Mazda is doing likewise. As of March 2005, there are no known reports of injuries related to this condition.

Sec. 573.6 (c)(8):

Owners of record will be notified of the noncompliance by first class mail during May 2006 and will be instructed to return their vehicle to a Mazda dealer for repairs. Repairs will involve modification of the energy absorbing material located above the headliner in the affected area, and be performed at no cost to the vehicle owner.

In accordance with Part 573.13 (d)(1), Mazda is excluding reimbursement for costs incurred by owners for repair of this problem because Mazda's original warranty program would provide for a free repair for this concern for customers.

Sec. 573.6 (c)(10) & (11):

A copy of the notification letters to be sent to dealers and owners will be forwarded when available.

Sec. 573.6 (c)(12):

Mazda has assigned recall number 4006D to this action.

Sincerely yours,  
Mazda North American Operations



*for*

David G. Robertson  
Manager,  
Environmental & Safety Engineering