

MITSUBISHI MOTORS

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January 14, 2008

Kathleen DeMeter, Esq.
Director, Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590

08V-022 (2 pages)

RE: 2006 and 2007 Mitsubishi Endeavor Right Front Seatbelt Assembly Special Service Campaign (Safety Recall SR-08-001)

Dear Ms. DeMeter:

Mitsubishi Motors of North America, Inc. (MMNA) submits this letter pursuant to 49 C.F.R. Part 573.5-Defect and Noncompliance Information Report (DIR). The DIR is for a potential safety related concern on certain 2006 and 2007 Mitsubishi Endeavor vehicles distributed in the United States by MMNA and in Puerto Rico by Mitsubishi Motor Sales of Caribbean (MMSC). On certain vehicles, the right side lower seatbelt anchor may separate during a severe vehicle crash. Mitsubishi Motors Corporation (MMC) had testing by the vendor completed and found that the brackets tested met FMVSS 571.208, 209 and 210 standards. However, because they do not meet MMC's internal standards, they have decided to conduct a "Special Service Campaign" in the form of a Safety Recall to replace the passenger side seatbelt assembly on the subject vehicles. Even though the tested brackets met all of the standards as stated above and would not normally be subject to a safety recall campaign, MMNA will comply with 49 CFR Part 573.5 and Part 577 to insure NHTSA remains informed on the issue and the completion rates for the appropriate time period. MMNA is not aware of any death, injury or property damage related to this issue.

## 1. Manufacturer's Name

Mitsubishi Motors North America, Inc.

2. Vehicles Potentially Containing the Defect

Make	Line	Model Year(s)	Manufacturing Period
Mitsubishi	Endeavor	2006 and 2007	10 July 2006 ~ 16 February 2007

Total Number of Vehicles: 7,340 (6,960 USA, 380 Puerto Rico)
 This recall will also be launched in Canada (468), Mexico (2,315) and the Philippines (32).

## 4. Approximate percentage of vehicles actually containing the defect:

It is impossible to estimate the actual number of seatbelt brackets that could potentially fail in a high speed impact, however owners of all suspect vehicles will be notified, and those vehicles will be included in this campaign.

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- 5. Defect Description: While the passenger side outboard seatbelt-mounting brackets tested at the request of MMC met all applicable safety standards, it may fracture when subjected to stresses generated under severe impact conditions beyond those required by FMVSS requirements. Breakage of the mounting bracket in a severe crash could allow the seatbelt to not properly restrain the passenger and potentially result in injury or death.
- 6. Chronological Summary of Events Leading to Determination: During a dynamic 35 mph hi-g sled test to confirm a minor change to the seatback reclining lever the stamped steel bracket attaching the lower passenger side seatbelt anchor failed. The forces at the lower bracket were much greater than those required by FMVSS standards, however MMC requested additional testing to determine why such a failure would occur. It was found that the manufacturer of the lower bracket substituted harder steel than specified for approximately 21 lots of seatbelt brackets. These brackets are out of MMC specification and are subject to failure under higher load conditions than those specified by either FMVSS 208, 209 or 210. Over 120 of the suspect brackets were tested (approximately 1% of the total) and all of them met FMVSS requirements, but they did not meet the internal performance requirements specified by MMC. MMC has decided that even though the tested brackets met all of the FMVSS standards, a special service campaign (safety recall) is in order to reduce the potential of a bracket failure in a high-speed crash.
- 7. Test Results or Data Used to Determine Non-compliance: Not Applicable as the brackets comply with the appropriate FMVSS requirements.
- 8. Proposed Remedy Description: All owners of the affected vehicles will be contacted by first class mail and encouraged to come into their local Mitsubishi dealer for replacement of the front passenger side seat belt and bracket assembly.
- 9. Notice(s) and Bulletin(s): The owner notification and technical bulletin drafts will be provided when they become available.
- 10. Reimbursements: Owners seeking reimbursement for any expenses relating to this recall will be directed in the notification letter to contact Mitsubishi Customer Relations for instructions on how to apply for a refund.
- 11. **Dealer Notification:** Mitsubishi has determined that this incident does not constitute an immediate and substantial threat to motor vehicle safety; therefore the three-day dealer notice does not apply. Our schedule for dealer and customer notification will be provided as soon as replacement parts availability is known. It is anticipated that it will be approximately 45 days before sufficient parts are available to launch this campaign, however every effort will be made to improve this timing.

If you have any questions or comments regarding this information, please let me know.

Sincerely,

Kent Reeves, National Manager

Product Support & Technical Compliance

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