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Mitsubishi Motors North America, Inc.
6400 Kallela Avenue
Cypress, CA 90630
Telephone: 714-372-6000
www.mitsubishicars.com

December 20, 2010

Jennifer Timian

Chief, Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590

RE: 2004-2010 Mitsubishi Endeavor Fuel Filler Pipe

Dear Ms. Timian:

On February 24, 2010, Mitsubishi Motors North America, Inc. (MMNA) submitted a letter pursuant to 49 C.F.R. Part 573.5-Defect and Noncompliance Information Report (DIR) that resulted in recall campaign 10V065000. As discussed with you by phone on December 14, 2010, MMNA is now submitting an amended DIR in order to expand recall campaign 10V065000. This amended DIR contains details of a potential defect relating to motor vehicle safety in an expanded vehicle population for the fuel filler pipe on certain 2004-2010 Mitsubishi Endeavor vehicles originally shipped to or currently being operated in locations where road salt is used and in cold conditions.

Mitsubishi is requesting that its initial DIR be expanded to include Endeavor production from 2004 to March 2010. This new vehicle production range is based on further investigation which has revealed that vehicles beyond the 2004 MY, as described in the initial DIR, may experience premature fuel filler pipe corrosion in severe corrosive environments. Specifically, road debris (mud) mixed with road salt can become trapped between a reinforcing bracket and the fuel filler pipe, potentially causing corrosion of the pipe. Over time, this corrosion could create a leak in the fuel filler pipe resulting in fuel leakage from the pipe during refueling of the vehicle. Fuel in the presence of an ignition source may result in a potential fire hazard.

There have been no reported incidents of injury or fire. In addition, fuel leakage while driving is prevented by a one way valve attached to the fuel tank which closes after completion of the filling operation. Further, any corrosive perforation of the fuel filler pipe will illuminate the Malfunction Indicator Lamp (MIL), initiated by the evaporative system check process, thereby informing the driver to have the vehicle checked by a repair facility.

The subject vehicles are distributed in the United States and Canada by MMNA, and in Puerto Rico by Mitsubishi Motor Sales of Caribbean (MMSC). Due to the cold weather/corrosion nature of this potential defect, this recall campaign will be conducted only in U.S. salt-belt states, the adjoining states, cold weather states, and Canada.

For 2004-2010 MY Endeavors which are registered in or where the owner is residing in U.S. non-salt-belt states, outside of cold regions or in Puerto Rico, and therefore not covered by the recall, MMNA will extend the warranty coverage for the fuel filler pipe to 10 years or 150,000 miles, whichever comes first. MMNA will also notify these owners of the extended warranty coverage for the fuel filler pipe to 10 years (from the original delivery date) or 150,000 miles, whichever comes first. This extended limited warranty covers the fuel filler pipe currently installed in each vehicle, even if the original part has been replaced, and is transferrable to subsequent vehicle owners.

Any customer who has experienced a corrosion related problem with the fuel filler pipe will be entitled to have the pipe replaced at no charge. MMNA will also reimburse any customer who has already paid to have the fuel filler pipe replaced where that replacement was due to corrosion.

If you have any questions or need any additional information, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Bennett', with a stylized flourish at the end.

Tom Bennett

Director, Service

Mitsubishi Motors North America, Inc.

Telephone 714-372-5554, Email: tbennett@mmsa.com

1. Manufacturer's Name

Mitsubishi Motors North America Manufacturing, Inc.

2. Vehicles Potentially Containing the Defect

Vehicles of the following model years and manufacturing periods and owner registered or currently residing in Canada and the affected salt-belt or cold regions listed below:

Make	Line	Model Year(s)
Mitsubishi	Endeavor	2004-2010

Affected Salt Belt Regions, Cold States, and Adjoining States: Salt Belt states include Connecticut, Delaware, Illinois, Indiana, Iowa, Kentucky, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Vermont, Virginia, West Virginia, Wisconsin, and Washington D.C.. Cold states include North Dakota, South Dakota, Nebraska, Kansas, Oklahoma, Colorado, Wyoming, Montana, Idaho, Washington, Oregon, and Utah. Adjoining states include Arkansas, Tennessee, and North Carolina.

3. Total Number of Vehicles

Vehicle Line	Number of Vehicles	
	United States	Puerto Rico
2004-2010 Endeavor	108,147	5,389

Recall Vehicles	52,712	0
Warranty Extension Vehicles	55,435	5,389

4. Approximate Percentage of Vehicles Actually Containing the defect:

It is impossible to tell the percentage of vehicles that may experience the subject problem since it is caused over time by mud mixed with road salt which may enter the fuel filler neck area when driving on roads covered by road salt. However, all the vehicles identified in Nos. 2 and 3 above will be included in this campaign.

5. Defect Description

In severe corrosive environments where road salts are frequently used in winter, vehicles may be exposed to road debris (mud) mixed with road salt. This material can become trapped between a reinforcing bracket and the fuel filler pipe, potentially causing corrosion to the fuel filler pipe. Over time, this corrosion can potentially result in perforation of the fuel filler pipe and resulting leakage of some fuel during vehicle refueling. There have been no reports of injury or fire.

6. Chronological Summary of Events Leading to Determination

In October 2008, MMNA received a single customer complaint regarding a 2004 MY Endeavor with a corroded fuel filler pipe and an investigation was started by MMC.

In May 2009, MMC completed its investigation and analysis of the fuel filler corrosion issue. Given the minimal warranty activity to date related to this issue, the fact the MIL light would illuminate should this part ever experience a corrosion related perforation (which would bring the customer into the dealership for repair), and the fact that fuel leakage while driving was prevented by a one way valve attached to the fuel tank, the issue was moved to monitor status.

In January 2010, in combination with PE09-0056 MMNA, MMC re-opened its investigation to study this issue further. With respect to the 2004 MY Endeavor vehicles, MMC reported that late during the 2004 MY production, MMC implemented a change to its internal standards related to corrosion protection/resistance of the fuel filler pipe. As a result, late during the 2004 MY production, a "second" generation fuel filler pipe was used which complied with this new, enhanced internal standard. As part of its investigation, and in responding to PE09-0056 MMNA, MMC determined that the complaints identified by NHTSA in the PE related only to the early or first generation fuel filler pipes, and not the second generation fuel filler pipes incorporating enhanced corrosion resistance consistent with MMC's new internal standard. Accordingly, MMC determined that a safety-related defect existed on some 2004 Endeavors and advised MMNA on February 17, 2010 to conduct a safety recall in order to identify and address those 2004 MY Endeavor vehicles having a first generation fuel filler pipe.

In May 2010, MMC re-opened its investigation in response to information from the field that dealers, while conducting recall 10V065000, were reporting some incidents of severe corrosion involving second generation fuel filler pipes. In December 2010, MMC concluded further investigation and analysis. Specifically, MMC determined that while the second generation fuel filler pipe clearly performed better in the field with significantly increased corrosion resistance, direct contact over long periods of time with mud/salt trapped between the reinforcing bracket and the fuel filler pipe, could result in perforation of the fuel filler pipe

Based on these findings, MMC determined that a safety-related defect existed on some 2004-2010 Endeavors and advised MMNA on December 14, 2010 to conduct a safety recall for the expanded range of the affected vehicles.

7. Test Results or Data Used to Determine Non-compliance

N/A

8. Proposed Remedy Description

Owners of affected vehicles originally sold or currently being operated in affected salt-belt, cold regions, and adjoining states in the US, and Canada will be notified via first class mail and instructed to bring their vehicles to their local Mitsubishi Motors dealer.

Vehicles with fuel filler pipes built before the new corrosion standard was implemented during late 2004 production will be replaced with a new "third" generation fuel filler pipe. [See footnote 1 below.]

Vehicles that have the second generation fuel filler pipes (late 2004 to March 2010 vehicle production) will be inspected and, if corrosion on the fuel pipe is observed, the pipe will be replaced with the third generation fuel filler pipe. For vehicles where corrosion of the fuel pipe is not observed, an anticorrosion wax will be applied to the filler pipe, and the inner wheel well shield will be replaced with a new part that provides improved protection against mud intrusion and accumulation between the fuel filler pipe and the protective bracket.

There will be no charge to the customer for the inspection or replacement if needed.

Owners of affected vehicles in non-salt-belt and outside of cold regions in the U.S. and Puerto Rico will be notified and informed that the warranty coverage for the fuel filler neck is extended to 10 years or 150,000 miles, whichever comes first.

9. Notice(s) and Bulletin(s)

Notification will be sent to owners of 2004 to March 2010 Endeavor production that have not had the fuel pipe replaced with a third generation fuel filler pipe under the existing recall. All customers will be requested to bring their vehicle to the dealer for inspection and repair.

Our schedule for dealer and customer notification will depend on the availability of replacement parts. At this time, we intend to notify dealers on or about March 28, 2011. We then intend to notify owners in two phases. First, 2004 and 2005 MY owners will be notified on or about April 11, 2011. Second, we will notify owners of 2006 MY through March 2010 production on or about June 13, 2011. The owner notification and technical bulletin drafts will be forwarded to your attention when they become available.

With respect to the initial recall involving 2004 MY vehicles only, and until the expanded recall is launched, the new parts are available and dealers are notified, we intend to have dealers change the current recall procedure for 2004 MY vehicles and replace all fuel filler pipes, both first and second generation, regardless of condition, with the third generation pipe. The draft dealer notice is enclosed.

10. Reimbursements

Owners seeking reimbursement for any expenses associated with this recall will be directed in the notification letter to contact Mitsubishi Customer Relations for instructions on how to apply for a refund.

Footnote 1: During its investigation, MMC determined that in severe corrosive environments where road salts are frequently used in winter, and in the event vehicles were exposed to road debris (mud) mixed with road salt, this mud/salt combination could become trapped between a reinforcing bracket and the fuel filler pipe, potentially causing corrosion to the fuel filler pipe. In an abundance of caution, while MMC continued to study the potential long term effects of this condition, MMC began to develop a "third" generation fuel filler pipe which, even if subjected to long term direct contact with a mud/salt combination, would not experience any significant corrosion. This third generation pipe entered production March 2010. This third generation pipe is being used for all recall-related replacements.

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 depend on replacement parts availability. At this time, however, we anticipate that dealer notification will begin on March 28, 2011.