Ms. Jennifer Timian, Chief
Recall Management Department
Office of Defect Investigations
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

May 28, 2014

Dear Ms. Timian:

This letter is written in response to your request contained in the acknowledgement letter we received for recall 14V-170. In the acknowledgement letter you requested a further explanation regarding the timing of Mazda`s decision for the existence of a safety defect related for the 2014 MY Mazda6 passenger cars.

We first became aware of the concern addressed by recall 14V-170 in February 2013 when we received a report from a dealer regarding one of the vehicles in their inventory. They had fueled the vehicle outdoors in very low ambient temperatures and then moved the vehicle into a heated building. They noticed that some fuel had leaked from the outlet of the evaporative emission control canister. Since then we have not received any customer complaints of fuel leaking from the evaporative emission control canister.

Our resulting investigation showed that because the fuel leakage from the canister potentially occurs only at the dealer shop, there is no defect in the vehicle. We understood from our investigation that under extreme, sudden temperature changes with a full fuel tank it was possible for the fuel to expand sufficiently to exceed the available vapor space in the tank. When that occurs liquid fuel will flow into the evaporative emission control canister.

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There is the possibility that the emission control performance of the canister can be diminished by exposure to liquid fuel, so we made a running change for our vehicle production in May 2013. To evaluate if there was any field occurrence of liquid fuel entering the canister and its potential impact to the canister emission control performance we collected and evaluated canisters from the field, between June and November, 2013. Recognizing that there may be an emission impact we performed additional testing on the change made in production to confirm its effectiveness.

In March of 2014, as we were preparing to move forward to consider a decision regarding an emission recall for this concern we did a search on previous industry actions for similar concerns. At that time we recognized that sometimes other manufacturers have treated similar situations as both an emission and safety related defect. So, even though we have not received any fuel-leakage related information from customers and do not regard this issue as providing an increased risk for safety, we decided to treat this concern as related to both safety and emissions, in an abundance of caution. The decision was made by Mazda on March 31 and the associated Part 573 report was drafted and submitted to your office on April 4, 2014.

If you have any further questions, please let me know. My telephone number is 248-295-7859.

Sincerely,

David Robertson, Group Manager
Environmental, Safety and Powertrain Engineering
Mazda North American Operations