

**Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision:**

In January, 2015, MMC received information from Mitsubishi Motors Sales of the Caribbean (MMSC), the distributor in Puerto Rico, that an incorrect VIN was printed on a vehicle's certification label. This was discovered when the subject vehicle was inspected by local authorities in Puerto Rico.

From February to August, 2015, MMC investigated the cause of this mislabeling, including the vehicle assembly process, the certification label print history, and from researching for other similar incidents. MMC confirmed that it is technically impossible to print the same VIN on more than one certification label since the label is made systematically based on the vehicle information data, which is unique to each vehicle. MMC also confirmed that there was no reprint history for the subject label. There were also no previous occurrences of VIN mislabeling to reference. MMC then found that the certification label installed on the subject vehicle in Puerto Rico matched the VIN for the vehicle manufactured just prior to the subject vehicle on the same assembly line. As a result of its investigation, MMC concluded that the most likely cause for the incorrect VIN on the certification label was the inadvertent installation of the incorrect label by a line worker during vehicle production.

MMC's investigation also revealed that this issue was isolated to only two vehicles for the following reasons:

- 1) The certification label printer located near the assembly line automatically prints the certification labels in sets of seven for the next seven vehicles on the assembly line, regardless if the vehicle requires a certification label or not. In the set of seven vehicles that preceded or followed the subject vehicle on the assembly line, only two vehicles (including the subject vehicle) required the certification label (destined for NAFTA).
- 2) Prior to October 2011, the VIN and part number on the certification label had been visually inspected during the checking process. From October 2011, the checking process for the certification label was enhanced by systematically scanning the barcode to ensure it matched the vehicle information data, thereby eliminating the possibility of human error.

On September 1, 2015, MMNA discussed this issue with NHTSA and MMNA was advised to conduct a noncompliance recall.

On September 7, 2015, MMC decided that field action was necessary as a noncompliance recall and advised MMNA to conduct a non-compliance recall in the US.