

NISSAN GROUP
OF NORTH AMERICA



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April 28, 2016

Mr. Gregory K. Rea
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
Room W48-302
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Sir:

We are transmitting the enclosed amended Defect Information Report in accordance with 49 CFR Part 573. This Defect Information Report includes model year and approximate vehicle production range and population affected.

Nissan plans to notify dealers on May 24, 2016 and will notify all affected owners within 60 days of initial DIR submission.

Very truly,

A handwritten signature in cursive script that reads "Derek Latta".

Derek Latta
Manager,
Technical Compliance

Encl.

DEFECT INFORMATION REPORT

1. Manufacturer:

Nissan Mexicana, S.A. de C.V. Aguascalientes plant

2. Vehicles Potentially Involved:

Nissan is in the process of specifically identifying and confirming the affected population. The information below is an estimate and Nissan will supplement the manufacturing range information when it is finalized.

<u>Model</u>	<u>Dates of Manufacture</u>
MY 2013-2016 Nissan Sentra	June 13, 2012 through April 14, 2016

3. Total Number of Vehicles Potentially Involved:

Approximately 622,110 vehicles are subject to this recall. Nissan will update the number of vehicles involved as soon as it is finalized.

4. Percentage of Vehicles Estimated to Actually Contain the Defect:

100%

5. Description of the Defect:

In the unusual event (specifically warned against in the Owner's Manual) of installing the child restraint system (CRS) in the front seat, the seat belt bracket may deform if the seat belt used to secure the CRS is significantly over-tensioned while the Automatic Locking Retractor (ALR) is engaged. If the seat belt buckle bracket is deformed, the Occupant Classification System (OCS) sensor may not correctly classify the installed CRS and may not suppress the passenger air bag as it is designed to do in this scenario. This may increase the risk of an injury to a child seated in the CRS installed in the front seat, contrary to Nissan and the CRS manufacturer's instructions and warnings.

6. Chronology of Principal Events:

In late July 2015, Nissan was notified by NHTSA of certain testing observations related to the OCS classification of installed CRS. More specifically, in the course of conducting multiple installations, NHTSA observed several installations where the CRS was not classified as designed.

Nissan began discussing the observations with NHTSA to gather additional information.

In mid-August 2015, Nissan provided NHTSA with requested OCS classification parameters and visited the MGA lab to observe the subject vehicle.

After the seat disassembly showed the seat belt buckle and its attachment bracket bending, Nissan hypothesized that the seatbelt was over-tensioned during multiple CRS installations.

In early September 2015, Nissan also began working to provide NHTSA replacement parts for additional testing at MGA test lab.

In late September 2015, Nissan attended testing being conducted for NHTSA at the MGA test lab. Concurrently, Nissan also initiated a vehicle inspection activity at the factory, dealers, and of employee lease vehicles to determine if the phenomenon observed at the test facility could be duplicated. During the MGA test series, Nissan observed that the cinch load exceeded the limits specified in the test procedure.

In October 2015, Nissan teleconferenced with NHTSA to share internal data and its investigation plan. NHTSA also shared its lab data with Nissan for further investigation.

In November 2015, Nissan presented the findings of Nissan's investigation which included field, dealer inventory and employee lease vehicle inspections; along with OCS threshold stack up analysis.

December 2015 – NHTSA conducted additional testing at the MGA lab and Nissan observed the testing. Again, Nissan observed that the cinch loads applied during the testing exceeded the limits specified in the regulatory test procedure.

Throughout this entire time period, Nissan monitored field data and had not identified any incidents related to this issue. Nissan is not aware of any real-world CRS classification issues in the subject vehicles except for the condition observed by NHTSA at the MGA test lab.

February 2016 – NHTSA provided Nissan with the results from the December testing, which Nissan further analyzed.

Early March 2016 – Nissan met with NHTSA to explain its analysis of the test results. At the meeting, Nissan reiterated that it believes the Sentra is fully compliant with all FMVSS requirements. Indeed, when testing has been conducted consistent with the procedures specified in the standard and in the Agency's published Test Procedures, the vehicle's OCS has consistently responded appropriately. Nissan believed the test observations were instead the result of repeated over-cinching of the seat belt, outside the parameters

of the range specified by the Agency, which led to induced deformation of the seat belt buckle strap and bracket. This deformation, although minimal, caused a residual stress on the OCS sensor. Nissan also noted that internal certification testing showed a total of 1,252 CRS installations were tested at the MGA lab during its own certification testing. All passed. However, Nissan also informed the Agency that it would study production improvements and the need for a field remedy program.

In Early April 2016, Nissan again met with NHTSA to explain the planned production improvements and its intent to conduct a field remedy program for in-use vehicles. Nissan provided the Agency with technical details, answered questions concerning the system and the proposed improvements, and conferred with the Agency on the campaign classification.

April 18, 2016 – Based on the Agency’s feedback and internal assessment of the issue, Nissan decided to conduct a Safety Recall and report this issue in accordance with the defect notification requirements specified 49 CFR Part 573 and to conduct a campaign in accordance with the provisions of 49 CFR Part 577.

7. Description of Corrective Action:

Dealers will be notified on May 24, 2016. Owners of the potentially affected vehicles will receive interim notification letters within 60 days, followed by final notification letters once the remedy is available. Customers will be warned not to install the CRS in the front seats. The seat belt bracket will be reinforced. Also, The Air Bag Control Unit (ACU) and OCS Electronic Control Unit (ECU) will be reprogrammed with the updated algorithm parameters. These remedies will be offered at no charge to the customer.

Nissan will include a statement in the Part 577 owner notification concerning reimbursement for the cost of obtaining a pre-notification remedy for the subject vehicles that are no longer under warranty. The statement will be excluded for the subject vehicles that are still under warranty. Your office will be provided with a copy of the Part 577 owner notification for approval.

8. Copy of Notices:

Copies of all notices will be provided to NHTSA as they become available.