

FCA US LLC Chronology
Takata PSAN (Non-Desiccated) PAB Inflators
Submitted May 24, 2016

- On May 4, 2016, the National Highway Traffic Safety Administration (“NHTSA” or the “Agency”) published an amendment to the November 3, 2015 Takata Consent Order regarding Takata passenger airbags (“PAB”) manufactured using non-desiccated Phase Stabilized Ammonium Nitrate (“PSAN”). This amendment expanded the scope of the original EA15-001 to include additional vehicles built with non-desiccated PSAN airbag inflators.
- In the May 4, 2016 amendment to the Takata Consent Order (“Takata CO Amendment”), NHTSA divided the United States into three zones based on the critical factors of temperature and absolute humidity:
 - Zone A: These are states and territories previously identified as the high absolute humidity (“HAH”) region (Alabama, Florida, Georgia, Hawaii, Louisiana, Mississippi, Texas, Puerto Rico, American Samoa, Guam, the Northern Mariana Islands (Saipan) and the U.S. Virgin Islands), plus the states of California and South Carolina.
 - Zone B: These are states and territories previously identified as the moderate temperature cycling and absolute humidity region. It includes the following states: Arizona, Arkansas, Delaware, the District of Columbia, Illinois, Indiana, Kansas, Kentucky, Maryland, Missouri, Nebraska, Nevada, New Jersey, New Mexico, North Carolina, Ohio, Oklahoma, Pennsylvania, Tennessee, Virginia and West Virginia.
 - Zone C: This region comprises states with lower temperature cycling and absolute humidity. It includes the following: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, Washington, Wisconsin and Wyoming.
- On May 16, 2016, Takata submitted a 573 Defect Information Report (“DIR”) to NHTSA stating that the front Programmable Smokeless Passenger Inflator (“PSPI”), and PSPI 1.1 non-desiccated PAB inflator could contain a safety defect.
 - Zone A population: All vehicles not currently under recall containing non-desiccated frontal Takata PSAN inflators, MY 2012 & older
 - Zone B population: All vehicles not currently under recall containing non-desiccated frontal Takata PSAN inflators, MY 2009 & older
 - Zone C population: All vehicles not currently under recall containing non-desiccated frontal Takata PSAN inflators, MY 2008 & older
- In the Takata CO Amendment, NHTSA relies on the findings of three research organizations NHTSA characterizes as being consistent with previous theories that most of the inflator ruptures are associated with a long-term phenomenon of PSAN propellant degradation caused by years of exposure to temperature fluctuations and intrusion of moisture present in the ambient atmosphere. (Takata CO Amendment, ¶12) “The temperature fluctuations and moisture intrusion are more severe in warmer climates with high absolute humidity.” (Takata CO Amendment, ¶12)
- “The Agency has concluded that the likely root cause of the rupturing of most non-desiccated frontal Takata airbag inflators is a function of time, temperature cycling and environmental moisture.” (Takata CO Amendment, ¶15)
- “The Agency has concluded that these non-desiccated frontal Takata PSAN airbag inflators do not pose an unreasonable risk to safety under the Safety Act until they reach a certain level of propellant degradation.” (Takata CO Amendment, ¶18)
- Consequence, as defined by Takata, “in the event of an inflator rupture, metal fragments could pass through the air bag cushion material, which may result in injury or death to vehicle occupants.”
- Scope is defined as all 2004-2008 MY RAM 1500 Pickup (“DR”), 2005-2009 RAM 2500 Pickup (“DH”), 2006-2009 RAM 3500 Pickup (“D1”), 2007-2010 RAM 3500 Cab Chassis (“DC”), 2008-2010 RAM 4500/5500 Cab Chassis (“DM”), 2008-2009 Sterling 4500/5500 Cab Chassis (“DA”), 2004-2009 Dodge Durango (“HB”), 2007-2009 Chrysler Aspen (“HG”), 2007-2012 Jeep Wrangler (“JK”), 2008-2012 Dodge Challenger (“LC”), 2005-2008 Dodge Magnum (“LX”), 2005-2010 Chrysler 300/Dodge Charger (“LX”), 2011-2012 Dodge Charger (“LD”),

2011-2012 Chrysler 300 (“LX”), 2005-2011 Dodge Dakota Pickup (“ND”) and 2006-2009 Mitsubishi Raider Pickup (“NM”) vehicles.

- Approximately 4,984,438 vehicles (US volume), will be affected based on the May 16 2016 Phase 1 and Phase 2 DIR submitted to NHTSA by Takata. Export vehicles will also be part of this recall; volumes and timing for inclusion are to be determined.
- Takata has not recorded a ruptured inflator in over 6,279 airbag tests of PSPI inflators retrieved from older FCA US vehicles residing in high absolute humidity environments, nor has one been reported in the field. Additional testing of the same inflator from a competitor’s vehicle brings the total number of successful deployments without a rupture to more than 10,000.
- On May 17, 2016, FCA US determined, through the Vehicle Regulations Committee, to conduct a Voluntary Safety Recall of all affected vehicles to replace the Takata PAB inflators with a desiccated design and/or a non-PSAN gas generate.

Reviewer	Initials	Reviewer	Initials
<input checked="" type="checkbox"/> Team Lead (Mike Royek, Peter Jonik, Ed Marck)	PJJ	<input checked="" type="checkbox"/> MGR Product Investigations (David Smith)	DWS
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<input checked="" type="checkbox"/> Technical Writer (Gabrielle Elser)	GCE	<input checked="" type="checkbox"/> Head, Vehicle Safety & Product Analysis (Steve Williams)	SLW