

NISSAN GROUP  
OF NORTH AMERICA



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Nissan North America, Inc.  
One Nissan Way  
Franklin, TN 37067

Mailing Address:  
PO Box 685001  
Franklin, TN 37068

April 24, 2017

Mr. Jeff Giuseppe  
Acting 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 Mr. Giuseppe:

We are transmitting the enclosed Noncompliance Information Report in accordance with 49 CFR Part 573. Nissan plans to petition the National Highway Traffic Safety Administration for a determination that the subject noncompliance is inconsequential as it relates to motor vehicle safety. The petition will be mailed to the Administrator within 30 days of the date of the noncompliance determination.

Very truly,

A handwritten signature in black ink, appearing to read "Derek Latta". The signature is stylized with a large, sweeping initial "D" and a long horizontal line extending to the right.

Derek Latta  
Manager,  
Technical Compliance

Encl.

## **NONCOMPLIANCE INFORMATION REPORT**

1. Manufacturer:

Nissan North America, Inc.

2. Vehicles Potentially Involved:

Model Year 2016-2017 Nissan Titan Crew Cab and Titan XD Crew Cab vehicles shown in the table below:

<b><u>Make/Model</u></b>	<b><u>Dates of Manufacture</u></b>
MY 2016-2017 Nissan Titan Crew Cab	September 29, 2015 through February 24, 2017
MY 2016-2017 Nissan Titan XD Crew Cab	August 7, 2015 through February 24, 2017

No other Nissan models are affected.

3. Total Number of Vehicles Potentially Involved:

Approximately 44,264 vehicles are affected.

<b><u>Make/Model</u></b>	<b><u>Vehicles Affected</u></b>
MY 2016-2017 Nissan Titan Crew Cab	25,164
MY 2016-2017 Nissan Titan XD Crew Cab	19,100

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

100%

5. Description of the Noncompliance:

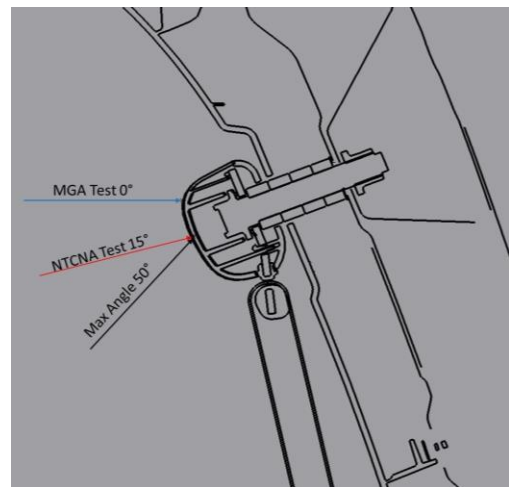
The rear seat belt assembly may not meet S7 of FMVSS No. 201. More specifically, the HIC(d) value for target RP2 specified in S10.4(b)(2) was 1,007.9 during NHTSA test conducted at MGA (MGA Test Report Mo. G17I7-001.6). This HIC(d) value for target RP2 exceeds the maximum of 1,000 specified in S7.

6. Basis for Determination of the Existence of a Noncompliance

During an MGA test conducted in January, 2017 the HIC(d) value for target RP2 specified in S10.4(b)(2) was 1,007.9. In February, Nissan received information request OA-201-20170112A from OVSC. While Nissan prepared its response to the information request, it concurrently conducted an investigation to determine the possible causes for the difference in HIC(d) results, as well as whether the MGA test result constituted a noncompliance or a non-repeatable test anomaly.

In March, Nissan submitted to NHTSA its response to OA-201-20170112A, including the internal test certification information (Nissan test number 6H61LPTNRP2-R3N); Nissan's vertical approach angle to target RP2; and additional testing conducted by Nissan. Nissan informed the agency that it was comparing internal testing to the subject MGA test to determine if there was a noncompliance and whether, if a noncompliance was confirmed, it is inconsequential to safety.

During the course of the investigation it was determined that a difference in vertical approach angle contributed to the difference in HIC(d) results between Nissan's certification test and the test conducted at MGA. As seen in **Figure 1** below, the test conducted at MGA used a zero degree (0°) vertical approach angle whereas the certification testing conducted by Nissan used a fifteen degree (15°) vertical approach angle. In Nissan's certification test, the 15° vertical approach angle allowed the head form to contact both the D-Ring bolt trim cap as well as the C-Pillar trim. However, in the test conducted at MGA at a vertical approach angle of 0°, the head form only contacted the D-Ring bolt trim cap.



**Figure 1 - Vertical Approach Angle**

Because the HIC(d) value for target RP2 resulting from a vertical approach angle of 0° in the MGA test exceeded 1,000, there is a technical noncompliance with S7 of FMVSS 201. However, based on its testing and engineering judgement, Nissan believes the MGA test outcome for the RP2 test point is inconsequential. Further details of Nissan's position will be presented to the agency during the Part 556 petition process.

#### 7. Description of Corrective Action:

For reasons indicated above, Nissan believes this noncompliance is inconsequential to safety and intends to file a petition pursuant to 49 CFR Part 556.

8. Copy of Notices:

Not Applicable.