

FCA US LLC Chronology
Takata PSAN (Non-Desiccated) PAB Inflators
Submitted January 9, 2018

- On May 4, 2016, 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 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
- On January 2, 2018, Takata submitted a 573 Defect Information Report to NHTSA stating that a defect related to motor vehicle safety may arise in some additional front Programmable Smokeless Passenger Inflator (“PSPI”), PSPI-1.1, PSPI-2, PSPI-6, PSPI-L and SPI non-desiccated PAB inflators.
 - Zone A population: Specific model Takata non-desiccated frontal airbag inflators containing phase stabilized ammonium nitrate propellant for Model Year 2013 vehicles in Zone A. Model Year 2012 and older were included in DIRs 17E-002 and 16E-042 for Zone A.
 - Zone B population: Specific model Takata non-desiccated frontal airbag inflators containing phase stabilized ammonium nitrate propellant for Model Year 2010 Zone B. Model Year 2009 and older were included in DIRs 17E-003 and 16E-043 for Zone B.
 - Zone C population: Specific model Takata non-desiccated frontal airbag inflators containing phase stabilized ammonium nitrate propellant for Model Year 2009 vehicles in Zone C. Model Year 2008 and older were included in DIRs 17E-001 and 16E-044 for Zone C.

- In the Takata CO Amendment, NHTSA relies on the findings of three research organizations, and characterizes those findings 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.”
- Approximately 317,000 vehicles (estimated US volume to be updated when Zone analysis is complete), will be affected based on the January 2, 2018 Phase 3 Defect Report to be submitted to NHTSA by Takata. Approximately 90,485 Export vehicles will also be part of this recall.
- Takata has not recorded a ruptured inflator in over 6,688 airbag tests of PSPI inflators and 1,630 airbag tests of PSPI 1.1 inflators retrieved from older FCA US vehicles residing in high absolute humidity environments, nor has one been reported in the field.
- On January 4, 2018, FCA US determined, through the Vehicle Regulations Committee, to conduct a Voluntary Safety Recall of all affected vehicles to replace defective Takata PAB inflators with a desiccated design and/or a non-PSAN gas generate.
- On January 4, 2018, FCA US confirmed that all 2009 MY Mitsubishi Raider vehicles are already under recall by Mitsubishi Motors North America and, therefore, are not included in this declaration.
- On January 5, 2018, FCA US confirmed that all 2009 MY Sterling Bullet vehicles are already under recall by Daimler Truck North America and, therefore, are not included in this declaration.