



---

Date: March 8, 2023

**Subject: Explanation of Mazda’s Memorialization of Vehicles that Meet Expanded “Other” Categories of Non-responsive, Vehicle Degradation, and Aftermarket Repairs/Vehicle Modification**

This document provides essential information on Mazda’s general approach of assigning Non-responsive and Unrepairable categories to specific vehicles as a means for accountability in determining completion rates. While this document provides a general explanation, it applies to all current and active recalls related to Mazda’s affected population of vehicles equipped with non-desiccated, Takata phased-stabilized ammonium nitrate (“PSAN”) inflators<sup>(\*)</sup>. The process of assigning the proper category to unique vehicles is important as this allows Mazda to optimize resources that further accelerate repairs to open Takata recalls. Regardless of a vehicle’s assigned category, recalls will continue to remain open until repairs are verified to be completed by authorized Mazda dealers.

Important Note - The “other” category counts representing non-responsive and unrepairable vehicles reported for each active recall are a starting point as submitted by Mazda and approved by NHTSA. As these are initial counts at the time of submission, they are anticipated to change as vehicles are identified that meet the approved criteria for non-responsive and unrepairable vehicles.

**Chronology**

Dec 22, 2020: NHTSA expanded categories of recalled Takata inflators appropriate for dispositioning through use of the “other” category. In addition to vehicles classified as “out of transit” under paragraphs 45-48 of the Amended Coordinated Remedy Order, and vehicles for which evidence exists of affected air bag(s) that have been deployed, removed, or retrieved through the salvage process (with an associated VIN), “other” may include vehicles qualifying for one of the following categories:

- (1) Non-responsive, (2) Vehicle Degradation, and (3) Aftermarket Repairs/Vehicle Modification

In order to account for affected vehicles dispositioned in any of these expanded categories, NHTSA required manufacturers to provide justifications on various items. Dispositioning of vehicles in the expanded categories would be reflected in completion rates on NHTSA’s public website as well as optimizing

manufacturers’ resources that further accelerate repairs to open Takata recalls.

Jan 2 2021~June 21 2022: Mazda reviewed various data sources to disposition VINs appropriately in the expanded “other” categories. This time period included activities of gathering information from internal databases, business partners experienced in owner registration data and recall outreach efforts, appending updated data from vendor resources, studying relevant warranty claims in detail, and providing an in-depth report that justified Mazda’s decisions for placing VINs in their appropriate “other” category. The final justification report was submitted to NHTSA on June 21, 2022 seeking approval from the Agency for Mazda’s approach and related counts.

July 22 2022: NHTSA granted approval for Mazda’s request to utilize the “other” categories for relevant VINs meeting specific criteria to disposition VINs in the expanded “other” categories. At the time of receiving approval, Mazda’s initial counts include the following driver and passenger front air bag inflators in Table 1. These counts reflect data available as of this document submission and are expected to change as additional VINs are identified that meet all criteria as approved by NHTSA. Changes will continue to be submitted through monthly dashboard reports until NHTSA deems that formal reporting is no longer necessary.

Table 1 – Total counts of inflators dispositioned in the expanded “Other” categories.

<b>“Other” Category</b>	<b>Number of Inflators(*)</b>	<b>Notes</b>
Non-responsive	110,407	Includes 80,874 unique VINs where certain vehicles have both driver and passenger side inflators affected.
Aftermarket Repairs / Modification	604	
Vehicle Degradation	132	
Owner Refusals	0	Mazda confirmed no VINs met criteria for this category

*(Data as of June 21, 2022)*

[Reference 1]

For further information and details on Mazda's approach and justifications for vehicle dispositioning, please refer to Mazda's report titled "*Subject: Takata Recalls Accounting Mazda Motor of America, Inc. dba Mazda North American Operations (MNAO) Intent to Use "Other" Reporting Categories for Nonresponsive, Vehicle Degradation, and Aftermarket Repairs/Vehicle Modification*" formally submitted to NHTSA on June 21, 2022.

[Reference 2]

For initial counts approved under the expanded "other" category for each affected Mazda recall, refer to related attachment "*Attachment A - Vehicle Information for Expanded Other Categories (Mazda / NHTSA recall numbers as applicable)*"

*(\*) Exception: MY2007~2009 B-Series trucks equipped with driver frontal air bag desiccated PSAN inflators.*