

573.6 (c) (7) - Test results and other information that the manufacturer considered in determining the existence of the noncompliance

Autoliv notified on Jaguar Land Rover November 2, 2016 advising that another customer of theirs submitted a 49 CFR 573 Report to NHTSA which stated that the ELR in the driver's safety belt assembly may not have been produced to specification. They advised that the component concerned was also supplied to Jaguar Land Rover. Autoliv advised that a seat belt retractor car-sensitive sensor (CS Sensor) concern could impair proper triggering of the Emergency Locking Retractor (ELR)'s vehicle sensitive mechanism.

Jaguar Land Rover opened a Product Safety and Compliance Committee (PSCC) investigation that was reviewed at the PSCC meeting on November 15, 2016.

Autoliv informed Jaguar Land Rover that the other OEM (BMW) had submitted on October 13, 2016, a 49 CFR 573 Report which stated that the Emergency Locking Retractor (ELR) in the driver's safety belt assembly may not have been produced to specification. Autoliv had identified through testing and analysis to support this submission that Jaguar Land Rover components may be affected.

The Autoliv investigation identified that during initial analysis of the returned part a potential concern with a subcomponent part of the seatbelt retractor commonly known as the car-sensitive sensor ("CS Sensor"). As a result, Autoliv and BMW commenced further analysis activities to assess and understand the nature of the reported issue.

The CS Sensor is manufactured and supplied by an Autoliv sub supplier and is assembled into the seatbelt retractor. Focused analysis on the CS Sensor indicated that a deviation in the injection molding manufacturing process at the sub supplier may have occurred which could impair proper triggering of the Emergency Locking Retractor (ELR)'s vehicle sensitive mechanism. The investigation into this possible manufacturer deviation that could result in the CS Sensor lever and housing to be out of tolerance and cause an interference.

Jaguar Land Rover supplied eight parts to Autoliv for testing and analysis and on November 25, 2016, Autoliv issued a test report to Jaguar Land Rover which reflected that 1 out of the 8 parts tested exhibited noncompliance to FMVSS 209 S4.3(j)(2).

Additionally, Autoliv performed a high level technical review/comparison of the BMW parts to the Jaguar Land Rover parts. Autoliv has determined that the parts supplied to Jaguar Land Rover contain the same combination of components which appear to be the major influencing parts on the condition seen in the BMW parts.

This issue was reviewed at Jaguar Land Rover's Recall Determination Committee (RDC) on December 1, 2016 where it was acknowledged that this matter is a non-compliance to the requirements of FMVSS 209 but inconsequential to vehicle safety such that a Petition for Decision of Inconsequential Noncompliance in accordance with the provisions of Part 556 be filed. The RDC agreed that the performance requirements of FMVSS 208 were met.

On May 2, 2019 Jaguar Land Rover North America, LLC received NHTSA's response to the petition submitted on December 23, 2016. In this response, NHTSA denied the petition for inconsequential non-compliance and requested Jaguar Land Rover conduct a recall.

There have been no reported accidents, injuries or fires as a result of this concern.