

[REDACTED]

From: Gunderson, Jeremy (NHTSA) <jeremy.gunderson@dot.gov>
Sent: Tuesday, October 11, 2022 10:08 AM
To: [REDACTED] Ansley, Alexander (NHTSA)
Cc: Ward, Sean (NHTSA); Simpson, Ashley (NHTSA); Hong, Kil-Jae (NHTSA); [REDACTED]
[REDACTED] Kruger, Jennifer (NHTSA)
Subject: [EXTERNAL] RE: Mazda Takata Recalls & 47 final repairs (under NHTSA recall ID #:16V354)

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[REDACTED], I received confirmation from our Chief Counsel's Office. We're good to go. Please file the population amendments for both recalls, upload a PDF of your email explanation as to why this shift is occurring to both campaigns and a Miscellaneous document. Also, when those numbers are first reflected in your monthly submissions, please let Ray Roth and I know. I appreciate your patience on this. Thanks.

-Jeremy

From: [REDACTED]
Sent: Wednesday, September 28, 2022 3:00 PM
To: Ansley, Alexander (NHTSA) <alexander.ansley@dot.gov>; Gunderson, Jeremy (NHTSA) <jeremy.gunderson@dot.gov>
Cc: Ward, Sean (NHTSA) <sean.ward@dot.gov>; Simpson, Ashley (NHTSA) <ashley.simpson@dot.gov>; Hong, Kil-Jae (NHTSA) <kil-jae.hong@dot.gov>; [REDACTED]
[REDACTED] Kruger, Jennifer (NHTSA) <jennifer.kruger@dot.gov>
Subject: RE: Mazda Takata Recalls & 47 final repairs (under NHTSA recall ID #:16V354)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Alex,

Thank you for the prompt response. From our teams perspective it would be unlikely that these VINs would be remedied/repared if they remain under the 2618F/19V781 recall; especially given where these VINs received their 'final' recall repair (i.e. Copart yards).

I left a voicemail for you earlier today. Hoping that we can catch up over the phone to discuss in more detail if you have a few minutes later today or tomorrow.

You may reach me directly @ [REDACTED]

Thanks again,
[REDACTED]

[REDACTED]
Sr Mgr, Takata Action Team
[REDACTED]
[REDACTED]



[Redacted text block]

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[Redacted text block]



[Redacted text block]



From: [Redacted]
Sent: Monday, September 26, 2022 8:56 PM
To: Gunderson, Jeremy (NHTSA) <jeremy.gunderson@dot.gov>; Ansley, Alexander (NHTSA) <alexander.ansley@dot.gov>
Cc: Ward, Sean (NHTSA) <sean.ward@dot.gov>; Simpson, Ashley (NHTSA) <ashley.simpson@dot.gov>; Hong, Kil-Jae (NHTSA) <kil-jae.hong@dot.gov>; [Redacted]
Subject: Mazda Takata Recalls & 47 final repairs (under NHTSA recall ID #:16V354)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Jeremy & Alex,

I hope your week is off to a great start.

The ultimate purpose of this email is to receive NHTSA feedback on Mazda’s interest to account for 47 Takata affected VINs (under the correct recall ID number) that our team (MNAO TAT) had repaired with a ‘final’ inflator/part through our Copart program.

Background:

As Mazda achieves a Takata accountability percentage ever closer to ‘100%’, the Takata Action Team (TAT) has found ourselves performing audits of various Takata VINs. We continually search for anomalies, outliers, etc.

Recently, TAT found a group of 47 Takata affected VINs that had received ‘final’ (9416E/NHTSA 16V354) repairs at Copart yards prior to the NHTSA 19V781 recall launch. Currently, these 47 VINs are not being counted as repaired; as they had been moved on to 2618F (NHTSA 19V781) along with 573 document filings to NHTSA.

MNAO TAT perspective:

These VINs should be accounted for as receiving a final recall repair as part of the 9416E/16V354 recall; rather than these 47 VINs currently being considered unrepaired under recall 2618F/19V781.

Original Category/Recall ID:

Mazda	NHTSA	Remedy	Count
9015L	15V869	Interim	40
8114L	14V773	Interim	7

Notes: All had previously been repaired under "Interim" recalls putting them on hold/limbo for future launch of DIR5 Final/Perm Recall

Category/Recall ID where VINs received a ‘final’ repair:

Mazda	NHTSA	Remedy	Count
9416E	16V354	Final	47

Notes: TAT decision was to pull ahead for Copart and repair

Category/Recall ID where 573 submissions currently place VINs:

Mazda	NHTSA	Remedy
2618F	19V781	Perm

Proposed solution:

MNAO TAT would like to work with Mazda Japan to resubmit 573 letters to NHTSA with these 47 Takata affected VINs that would officially place these 47 VINs in the 9416E/16V354 recall – where they had received their ‘final’ repairs.

Why?

Whenever possible, MNAO has consistently pulled ahead DIRs/PGs launches to try and find and repair Takata affected VINs/Vehicles as soon as possible (since we believe the chances of finding and repairing recalled vehicles diminishes over time). By launching our Copart program and supplying the Copart team with the grouping of the first 11 characters of a Takata affected VIN, which covered these 47-VINs – even though 2618F/19V781 had not yet launched. From our perspective this action was appropriate, reasonable and responsible. It is our belief that the refile of the 573 letters to reclassify these 47 VINs as receiving their final repair in the 9416E (NHTSA 16V354) recall is the correct and appropriate next step.

Request of NHTSA:

Our team (and Mazda Japan/MC) are seeking NHTSA’s feedback and approval on this action (to refile the 573 letters reclassifying these 47 VINs as having received their final repair in the 9416E/16V354 recall). Would NHTSA agree with this course of action or present our team with their suggested course of action?

NOTES:

MNAO TAT Copart program process:

- Sent grouping of first 11 characters of Takata affected VIN #'s over to Copart
- Copart would scan for Takata affected vehicles making their way onto Copart yards...
- Copart would provide MNAO all VINs that matched the first 11 characters of the VIN that made it onto their yards
- MNAO would filter VINs and alert Mazda dealerships and/or AER mobile repair partner to those vehicles in local Copart yards needing Takata recall repairs...
 - (Given parts were available) MNAO TAT decided to escalate Takata recall repairs by ‘pulling ahead’ and developing a process of repairing Takata affected VINs/Vehicles prior to NHTSA’s ACRO DIR deadline/due date
 - MNAO TAT worked with MNAO Warranty to ensure the Warranty team did not reject these claims (since they were ‘pulled ahead’ – and ensured that they were processed correctly through the MNAO RO/Warranty claims system)

Thank you and your team in advance for your consideration and feedback. Please let me know if you/your team have any questions OR if it would be beneficial for me to schedule a conference call to discuss this topic in greater detail with the NHTSA team.

Sincerely,

[Redacted signature]

[Redacted contact information]

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