



April 29, 2020

Mr. Joshua Neff
Chief, Recall Management Division
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
Room W48-302
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Reporting Under the "Other" Category in Takata Campaigns ACRO 48(b)

Dear Mr. Neff:

Nissan has notified NHTSA of its intent to expand the use of the "other" category in reporting completions on quarterly reports pursuant to Paragraph 47 in the Third Amendment to the Coordinated Remedy Order ("ACRO"). The expansion applies to recall 20V-008. This communication provides an explanation as to financial resources saved and reallocation of such resources associated with the use of "Other" category.

In short, Nissan has not realized net financial savings associated with the use of "Other" category. Nissan has contracted with Harbor Business Partners, LLC (Harbor) to review un-remedied recall populations to assess the number of vehicles in operation and filter out vehicles determined to be no longer in use. Nissan's primary objective in contracting with Harbor is not cost savings at all; but, rather, to gain a better understanding of the actual vehicles in operation that need to be recalled, and then to focus all its efforts to reach that population, rather than attempting to notify owners of vehicles that are not in operation.

While the cost of this activity is overall more expensive than the typical Part 577 recall notifications and certain other outreach efforts to the VINs in the "Other" category; Nissan firmly believes it is very important to the overriding goal of remedying vehicles and eliminating the hazards associated with the recalled Takata inflators by allowing Nissan to focus its outreach specifically where it has the most potential to have positive impact. To that end, Nissan thanks the agency staff for their suggestion that un-remedied vehicle data be filtered to ascertain which vehicles subject to the Takata recalls remain in use.

Very truly,

A handwritten signature in black ink, appearing to read "Derek Latta". The signature is stylized and fluid.

Derek Latta
Manager,
Technical Compliance

Cc Stephen Hench