



Nissan North America, Inc.

One Nissan Way
Franklin, TN 37067

Mailing Address:
PO Box 685001
Franklin, TN 37068

September 11, 2020

Mr. Jeff Giuseppe
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
Room W48-302
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Mr. Giuseppe:

We are transmitting the enclosed Non-Compliance Information Report in accordance with 49 CFR Part 573. A voluntary recall campaign will be initiated and your office provided with the notices.

Very truly,

A handwritten signature in black ink, appearing to read "Derek Latta", with a long horizontal flourish extending to the left.

Derek Latta
Manager,
Technical Compliance

Encl.

NONCOMPLIANCE INFORMATION REPORT

1. Manufacturer:

Nissan North America Inc., Canton, MS plant

2. Vehicles Potentially Involved:

Certain Model Year 2019 Nissan Titan vehicles manufactured in the Canton, Mississippi plant from November 22, 2019 to December 3, 2019 (End of Production).

Based on supplier records, the subject condition only affects certain Model Year 2019 Nissan Titan vehicles with LED (Light-Emitting Diode) head lamps. Model Year 2020 Titan vehicles use a different supplier.

The subject LED headlamps are specific to Titan vehicles produced at the Canton plant and, based on supplier records, this issue affects no other Nissan or Infiniti vehicles.

<u>Part Number</u>	<u>Description</u>	<u>Applicable Model</u>
26010-EZ22B	RH Head Lamp	2019 Nissan Titan
26060-EZ22B	LH Head Lamp	2019 Nissan Titan
26010-9FT1B	RH Head Lamp	2019 Nissan Titan
26060-9FT1B	LH Head Lamp	2019 Nissan Titan

The LED head lamp manufacturer is:

Ventra Sandusky LLC
A Division of Flex-N-Gate Corporation
3020 Sandusky, Ohio 44870

Tom Alliman
Quality Manager
(419) 656-2173

3. Total Number of Vehicles Potentially Involved:

Approximately 82 Model Year 2019 Nissan Titan vehicles

4. Percentage of Vehicles Estimated to Actually Contain the Noncompliance:

100%

5. Description of the Noncompliance:

Due to an operator error at the supplier, the wrong software program was used to etch markings into the head lamp lens on the affected vehicles. Specifically, the LED head lamp may have been assembled with halogen head lamp lens markings, and as a result, the LED head lamps may not contain the correct nomenclature and photometric aiming marks. In this condition, the LED head lamps do not meet the requirements defined in S10.18.5.3; Optical axis marking-visual/optical aim headlamp and S10.18.9.6.1; The lens of a lower beam headlamp must be marked "VOL" if the headlamp is intended to be visually/optically aimed using the left side of the lower beam pattern of FMVSS No. 108. Additionally, the head lamps do not conform to requirements defined in S6.5.3.4; Replaceable bulb headlamp markings.

The issue does not impact headlamp aim and performance at the time of manufacturing, but may impact serviceability when aiming the head lamp or replacing a bulb.

6. Basis for Determination of the Existence of a Noncompliance

December 2019 – During a routine internal audit, a Nissan lab technician noticed a discrepancy with the markings on the LED head lamp assembly of a Titan vehicle at the Canton plant. Nissan notified the supplier of the issue and with the supplier, began an investigation.

January 2020 – Nissan conducted an on-site review of the supplier LED head lamp production process to determine the scope and root cause of the issue.

February 2020 – During the investigation, it was discovered that due to an operator error at the supplier, the halogen head lamp software program was incorrectly used to etch markings into the LED head lamp lens assembly.

Using supplier production records, Nissan initiated a warranty parts collection activity to confirm the range of affected vehicles. Nissan also inspected in-house fleet vehicles for potentially affected parts. During this time, Nissan conducted a follow up on-site supplier review to obtain additional information about the scope of the issue.

March 2020 to June 2020 – Nissan experienced business interruptions of U.S. operations due to COVID-19 public health concerns. As a result, the Canton, MS plant was shut down from March 30, 2020 to June 8, 2020. Because of the shutdown and local public health requirements, the investigation process was slowed.

July 2020 through August 2020 - Nissan also concluded its analysis of the warranty return parts collection activity. Nissan also initiated a dealer action, requesting dealers to inspect their vehicle inventory. Both actions confirmed that no vehicles outside of the supplier suspect range were affected. Concurrently, Nissan determined whether the subject condition affected compliance with FMVSS.

September 3, 2020 – Upon confirming that the subject condition affected compliance with FMVSS No. 108, Nissan made a noncompliance determination.

7. Description of Corrective Action:

Nissan will notify all owners of potentially affected vehicles beginning October 20, 2020. Dealers will be notified on September 15, 2020. Dealers will inspect the LED head lamp markings and replace one or both of the head lamp assemblies if incorrect.

We will not include a statement in the Part 577 owner notification concerning reimbursement for the cost of obtaining a pre-notification remedy as the subject vehicles are under warranty.

8. Copy of Notices:

Copies of all notices will be provided to NHTSA as they become available.