



Nissan North America, Inc.

One Nissan Way
Franklin, TN 37067

Mailing Address:
PO Box 685001
Franklin, TN 37068

February 9, 2023

Ms. Anne Collins
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 Ms. Collins:

We are transmitting the enclosed Defect 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 "Will Swindell".

Will Swindell
Manager,
Technical Compliance

Encl.

DEFECT INFORMATION REPORT

1. Manufacturer:

Nissan North America, Inc., Smyrna Plant
 Nissan North America, Inc., Canton Plant

2. Equipment Potentially Involved:

<u>Part Number</u>	<u>Description</u>	<u>Production Dates</u>	<u>Applied Model Year / Model</u>
98510-ZC08A	Driver's Airbag Assembly	Sept 25, 2007- Mar 1, 2011	Model Year 2004 – 2008, 2011 - 2012 Nissan Titan; Model Year 2004 – 2008, 2011 - 2012 Nissan Armada
98510-ZC08B	Driver's Airbag Assembly		
98510-ZM40A	Driver's Airbag Assembly	Sept 27, 2007- April 27, 2011	Model Year 2004 – 2008 Nissan Quest
98510-ZM40B	Driver's Airbag Assembly		
98510-ZM40C	Driver's Airbag Assembly		
98510-ZM78A	Driver's Airbag Assembly		
98510-ZM78B	Driver's Airbag Assembly		
98510-ZQ08A	Driver's Airbag Assembly		
98510-ZQ08B	Driver's Airbag Assembly		
98510-ZV08C	Driver's Airbag Assembly		
98510-ZP51A	Driver's Airbag Assembly	Sept 13, 2007- Aug 11, 2010	Model Year 2005 – 2008, 2011 -2013 Nissan Frontier; Model Year 2005 – 2008, 2011 -2013 Nissan Xterra; Model Year 2005 – 2008, 2011 -2012 Nissan Pathfinder
98510-ZP51C	Driver's Airbag Assembly		
98510-ZP51D	Driver's Airbag Assembly		
98510-ZP61C	Driver's Airbag Assembly		
98510-ZP61D	Driver's Airbag Assembly		
98510-ZS08A	Driver's Airbag Assembly		
98510-ZS18A	Driver's Airbag Assembly		

The driver's airbag assembly parts listed may contain the defect described in Section 5 below. The date range was determined using the start and end of part production dates. Service parts were available for repair for the applicable models. The potentially affected driver's airbag assemblies may have been installed on vehicles as part of a subsequent theft or collision repair.

Driver's airbag assembly parts produced before or after the dates above are not affected. Nissan confirmed that no affected parts remain in service inventory.

The name and address of the driver's air bag assembly supplier is:

Autoliv ASP, Inc.
 1320 Pacific Drive
 Auburn Hills, MI 48326
 United States

Maryann Pierce Perttunen
 Vice President Legal
 maryann.perttunen@autoliv.com
 Direct: +1-248-276-0713

3. Total Number of Parts Potentially Involved:

<u>Part Number</u>	<u>Description</u>	<u>Quantity</u>	<u>Applied Model</u>
98510-ZC08A	Driver's Airbag Assembly	815	Nissan Titan; Nissan Armada
98510-ZC08B	Driver's Airbag Assembly	1350	
98510-ZM40A	Driver's Airbag Assembly	177	Nissan Quest
98510-ZM40B	Driver's Airbag Assembly	22	
98510-ZM40C	Driver's Airbag Assembly	146	
98510-ZM78A	Driver's Airbag Assembly	201	
98510-ZM78B	Driver's Airbag Assembly	86	
98510-ZQ08A	Driver's Airbag Assembly	459	Nissan Titan; Nissan Armada
98510-ZQ08B	Driver's Airbag Assembly	1229	
98510-ZV08C	Driver's Airbag Assembly	74	
98510-ZP51A	Driver's Airbag Assembly	1159	Nissan Frontier; Nissan Xterra; Nissan Pathfinder
98510-ZP51C	Driver's Airbag Assembly	2769	
98510-ZP51D	Driver's Airbag Assembly	1259	

98510-ZP61C	Driver's Airbag Assembly	242	
98510-ZP61D	Driver's Airbag Assembly	278	
98510-ZS08A	Driver's Airbag Assembly	572	
98510-ZS18A	Driver's Airbag Assembly	8	

Approximately 10,846 parts are affected. A breakdown of airbag assembly type by model is shown in the table below.

4. Percentage of Equipment Estimated to Actually Contain the Defect:

Approximately 0.03%. 1% is used here because submission within NHTSA's safety portal will not allow a non-numeric value.

5. Description of the Defect:

The resin emblem on the driver's airbag module cover in affected vehicles may have reduced durability due to potential Tier 2 supplier production process variation. In this condition, the posts of the emblem may develop cracks over time, and the emblem and retainer components could detach in the event of an airbag deployment. A detached emblem and/or retainer component may become a projectile during an airbag deployment, increasing the risk of injury to vehicle occupants.

6. Chronology of Principal Events:

January 2022 - Nissan received a customer Vehicle Owner Questionnaire (VOQ) from NHTSA related to an alleged injury reportedly caused by emblem detachment during a driver's airbag deployment on a Model Year 2008 Nissan Titan vehicle. Nissan launched an investigation into the issue.

Nissan identified three previous allegations of injury caused by detached emblems related to an airbag deployment event. At the time, based on the analysis Nissan conducted on the one (1) available part, Nissan believed it was an isolated incident.

- February 2019 lawsuit - Analysis of Model Year 2010 Titan identified contaminant residue on the broken emblem
- December 2020 Takata Trust Claim - Nissan has been unable to inspect the Model Year 2010 Armada
- December 2020 VOQ - Nissan was unable to inspect the Model Year 2009 Armada because it was salvaged

March 2022 - Nissan inspected the January 2022 VOQ incident vehicle but was not permitted to collect the incident part for further analysis. Nissan expanded its search to look for broken emblems. Additionally, Nissan initiated a parts return activity to retrieve any broken emblem field parts.

April 29, 2022 through August 2022 – Nissan shared their findings from the January 2022 VOQ vehicle inspection with NHTSA, including evidence of unknown liquid residue at the emblem location and on the emblem. Nissan continued attempts to collect the January 2022 VOQ incident part for analysis.

Additionally, Nissan collected two (2) field parts with the same emblem design produced within 3 months (November 2007) of the January 2022 VOQ incident part and which had allegedly broken off from the steering wheel cover (but not during an airbag deployment).

September 2022 through December 2022 – Nissan worked together with the airbag supplier (Autoliv) and conducted an emblem traceability study that linked the potential emblem quality issues to the Tier 2 supplier (Douglas) production. Data suggested review was needed of the Tier 2 supplier's procedures for sorting, molding or chroming of material at the start of production.

As part of the investigation, Nissan conducted a search for claims related to the subject condition. Nissan refined its search criteria multiple times to identify claims of broken or detached emblems. After extensive analysis, Nissan identified one hundred seventeen (117) reports of cracked or detached emblems. However, not one of them was related to airbag deployment. A majority of the identified claims were related to cosmetic concerns about the emblem.

Nissan continued updates to NHTSA on its field collection activity and attempts to collect the January 2022 VOQ incident part. Initial analysis of the other two (2) collected field parts showed broken emblem posts and revealed degradation that may have been due to melt flow rate variation during production. There was also evidence of material degradation potentially caused by the chrome plating process.

January 2023 – Nissan received the January 2022 VOQ incident part and began analysis.

Nissan shared the results of its investigation of the 2 collected field parts with NHTSA during a call on January 19, 2023. The majority of the instances of broken emblems come from an 8-month production period in 2007-2008 when Douglas supplied the emblem and was found to have used resin with non-optimized melt flow parameters in the injection molding process. Breaking of emblems was likely caused by a combination of material quality, quality of chrome plating of emblem, and customer usage.

Subsequent analysis of the January 2022 VOQ incident part confirmed that it also had a lower tensile strength, similar to the two (2) collected field parts. Nissan also worked with Autoliv to identify the potentially affected vehicle population based on internal production records.

February 2, 2023 – Based on the results of the investigation, and out of an abundance of caution, Nissan decided to conduct a Voluntary Safety Recall Campaign.

7. Description of Corrective Action:

Dealers will be notified beginning February 10, 2023. Owners of all potentially affected vehicles will receive an interim letter by April, 10 2023. The repair is under study at this time. When the repair is ready, customers will receive a final invitation to repair letter. All inspections and repairs will be performed free of charge for parts and labor.

Nissan will include a statement in the Part 577 owner notification concerning reimbursement for the cost of obtaining a pre-notification remedy for a subject part that is no longer under warranty at time of repair.

8. Copy of Notices:

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