



## **Looking Forward: Possible Agency Action and Solutions**

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Throughout this Coordinated Remedy Program Proceeding, the agency has been gathering information in order for our Administrator to decide whether the agency needs to take action beyond our routine recall procedures to speed up the vehicle manufacturers remedy programs; and if so, how to do that. As we've explained, the size of these recalls is unprecedented. There is not a "one-size-fits-all" approach to solving this problem. Our Administrator has not yet made any decision, but is considering whether to accelerate each vehicle manufacturer's remedy program.

Should the Administrator find that an accelerated remedy is necessary and appropriate, there are several actions the agency could take. And the agency is evaluating each of them.

First, the agency might require a manufacturer to further speed up its recall processes for the highest priority vehicles by getting more inflators, faster, to regions with the highest priority vehicles. This might also require further expansion of the sources of replacement parts.

Second, the agency could monitor and discuss on an ongoing basis any problems the vehicle manufacturers face in obtaining replacement parts, and any problems suppliers face in manufacturing those replacement parts. This would involve coordination by NHTSA across multiple manufacturers and suppliers outside our usual processes for overseeing recall programs.

Third, if it is necessary, the agency could expand which facilities are allowed to do the remedy work to replace the inflator. Currently, only dealers authorized by each vehicle manufacturer are able to provide repairs. If dealers for a vehicle manufacturer are unable to keep up with the demand for replacements even though plenty of parts are available, we may consider allowing repair shops or other facilities to complete recall repairs. While this is something specifically allowed in the law, these inflator parts are complex and unique. Also, as Ms. Timian mentioned, only someone with specialized training, should replace these parts. Unless the agency orders differently, consumers should only go to the manufacturer's dealerships, as they are the only places that are currently authorized to conduct recall repairs.

Fourth, the agency is also considering the appointment of an independent third party to aid NHTSA in overseeing the vehicle manufacturers' remedy programs. Someone in this position would deal directly with the manufacturers and the suppliers on a day-to-day basis to discuss any issues that come up about supply, production, or recall completion.

Fifth, the agency is also considering ordering Takata or vehicle manufacturers to conduct additional testing that focuses on the inflators being used as remedy parts. We know that age is probably a factor in these ruptures, so any testing would need to focus on making sure that we don't have the same problem all over again several years down the road with the Takata inflators that are being used as replacements.

Sixth, there is other testing the agency might do itself, or require of industry, to evaluate how inflators and air bags perform as they age. The average age of vehicles on the road is now over 11 years old and may continue to go up thanks to advances in technology. Modern air bag technology has only been in use for around 25 years, and at this point, we don't know too much about whether or how a 15- or 20-year-old air bag works differently than a new air bag. So the agency is considering starting a proactive surveillance program designed to look at the lifespan of this technology.

Seventh, given the size and complexity of this problem, and our current understanding of what seems to cause the problem, we may also need to expand the recalls in the future to cover even more vehicles. The agency is currently looking into the size of these potential recalls, and how such recalls could impact the vehicle manufacturers' current remedy programs. If the agency determines that more vehicles with Takata inflators need to be recalled to protect public safety, we want to make sure those recalls are conducted in a way that is consistent with our goal of replacing defective inflators as quickly as possible and addressing the highest-risk inflators first.

Finally, the agency is also considering whether it would be appropriate and beneficial to develop a coordinated message with the vehicle manufacturers that focuses on consumer awareness and maximizing recall completion rates. As we've mentioned, the first step is getting the replacement parts; and we have been working with the manufacturers and suppliers to make sure there are enough parts available and that they are going where they are needed most. The next step, though, is getting consumers into the dealer to get their vehicle fixed; and this is an area where a coordinated, targeted message across the industry could be used to improve recall completion rates and improve public safety.

As you can see, the agency is considering a wide variety of options for actions we could take, if the Administrator decides to accelerate any or all of the vehicle manufacturers' remedy programs. We will continue to evaluate all of the information and data as it becomes available. Our first and foremost concern has been, and will continue to be, the safety of the American public. Any actions in a possible Coordinated Remedy Program would be designed to ensure that the public is adequately protected. Ultimately, Americans need to know that their vehicles have safe, properly working inflators and air bags that will be ready and waiting to save a life when needed.