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December 15, 2017

Dr. Stephen Ridella, Director
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Washington, D.C. 20590

Ms. Kerry Kolodziej, Acting Assistant Chief Counsel for Litigation and Enforcement
Office of Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Washington, D.C. 20590

Subject: Notice of Anticipated Shortage and Request for Extension (“Extension Request”) for Priority Groups #5 and #6

Dear Dr. Ridella and Ms. Kolodziej:

Mazda Motor of America, Inc. dba Mazda North American Operations (“Mazda”) respectfully submits this Extension Request for Priority Groups #5 and #6, as a supercession to previously submitted requests on May 15, 2017 and August 15, 2017, respectively, pursuant to the Third Amendment to the Coordinated Remedy Order (“ACRO”) Paragraph 39, sections (i) through (v).

Applicable models include the following:

- 2007-2009 MY B-Series, equipped with passenger side air bag inflators in Zone “A” as assigned by ACRO-Annex A in Priority Group 5.
- 2007-2008 MY B-Series, equipped with passenger side air bag inflators in Zone “Non-A” as assigned by ACRO-Annex A in Priority Group 6.

No other Mazda vehicles in Priority Groups #5 and #6 are affected by this submission. Additionally, a signed affidavit by a responsible company officer is included.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Rob Milne'.

Rob Milne
Director, Takata Action Team
Mazda North American Operations

Cc: Arija Flowers, Trial Attorney for Litigation and Enforcement
Stephen Hench, Trial Attorney for Litigation and Enforcement

The affected models include: (1) 2007-2009 MY B-Series, equipped with passenger side air bag inflators in Zone “A” as assigned by ACRO-Annex A to Priority Group 5, and, 2007-2008 MY B-Series, passenger side airbags in Zone Non-A, as assigned to Priority Group 6 in ACRO-Annex A. The following sections provide explanations in response to each of the specific concerns raised by the agency.

Paragraph 39, Section (i): Why sufficient supply deadline will not be met.

As Ford Motor Company (“Ford”) was lead engineering design and manufacturer of the 2007-2009 MY B-Series model equivalent to 2007-2009 MY Ford Ranger produced vehicles, Mazda is wholly dependent on Ford for design, development, validation, and supply of service parts, including air bag inflator replacements, to support Takata recalls. Ford has informed Mazda an estimated time to provide replacement parts is to be determined as of this submission letter date. The reasons stated for this timing are due to longer than anticipated development periods and subsequent testing requirements necessary to assure safe and proper operation of the replacement dual-stage, air bag inflators currently targeted to use a non-Phased Stabilized Ammonium Nitrate (“non-PSAN”) propellant produced and manufactured by Autoliv.

Paragraph 39, Section (ii): Remedy part selection, validation, development process used.

Mazda is following Ford’s lead on the remedy part selection for recall replacement parts. As the decision was made to use a non-PSAN based inflator propellant, a new company was selected as the designated supplier. Because the supplier is new, the process of design, development, validation, and manufacturing of service parts was restarted from the beginning and requires additional time to perform the necessary due diligence on assurance of the replacement parts safe function and operation. Ford can provide specific details upon request.

Paragraph 39, Section (iii): Steps taken to obtain sufficient supply.

Mazda continues to remain in close contact with Ford on timing for replacement parts availability since the ACRO was issued on December 9, 2016. Ford has provided the necessary information which Mazda has studied and utilized in making the decision to file this subsequent extension based on replacement parts supply availability.

Paragraph 39, Section (iv): How many replacement parts (number and percentage ready for launch).

The following table represents replacement parts anticipated to be available by the Supply and Remedy Launch Deadline for Priority Groups 5 and 6. “Affected Units” shown represents Zones “A” and “Non-A” volumes reported in Defect Information Reports dated March 30, 2017 and May 9, 2017, respectively.

Table 1 – Priority groups 5 & 6 models and replacement parts available by Supply and Launch Deadline:

Model Year(s)	P G	Make	Model	Position	Zone	Supply & Launch Deadline	Affected Units	*Number of Parts Available	*Percent Available at Launch
2007-2009	5	Mazda	B-Series	Passenger	A	January 31, 2018 (from June 30, 2017)	4,081	0	0%
2007-2008	6	Mazda	B-Series	Passenger	Non-A	January 31, 2018 (from September 30, 2017)	957	0	0%

**Note – Recall replacement parts availability provided by Ford Motor Company.*

Paragraph 39, Section (v): Specific extension request date.

Mazda will formally request an extension date in a supplemental submission upon confirming the parts available schedule from Ford Motor Company.

Key Terms

Ford: Ford Motor Company

Mazda: Mazda Motor of America, Inc. dba Mazda North American Operations (MNAO)

Non-PSAN: The term used to represent other inflators that do not use propellant subject to the Takata “PSAN” based inflator recalls

PSAN: Abbreviation for phase-stabilized ammonium nitrate

AFFIDAVIT

I, Robert T. Davis, am the Senior Vice President, Special Assignments of Mazda Motor of America, Inc. dba Mazda North American Operations. I declare under penalty of perjury that I have undertaken and directed appropriate actions to assure that the answers provided in this submission are complete and correct, that I have directed the resources appropriately of Mazda Motor Corporation and Mazda Motor of America, Inc. dba Mazda North American Operations to be utilized diligently for information and responsive in requesting this Notice of Anticipated Shortage and Request for Extension (“Extension Request”) for Priority Groups #5 and #6, as required in the Third Amendment to the Coordinated Remedy Order (ACRO), Paragraph 39, and that, to the best of my knowledge, the answers to the inquiries provided to NHTSA respond completely and correctly to this “Extension Request.”

Executed on December 15, 2017 at Irvine, California.



Robert T. Davis
Senior Vice President, Special Assignments
Mazda North American Operations