



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

July 7, 2017

The Honorable Bill Nelson  
Ranking Member  
Committee on Commerce, Science,  
and Transportation  
United States Senate  
Washington, DC 20150

Dear Senator Nelson:

Thank you for your letter to Secretary Chao highlighting the importance of the Takata recalls and sharing your oversight work to date. Since safety is a top priority of the U.S. Department of Transportation, these recalls continue to receive heightened attention from the National Highway Traffic Safety Administration (NHTSA).

As you know, NHTSA has established a Coordinated Remedy Program to facilitate the prioritization, organization, and phasing of the replacement of defective air bag inflators to ensure that defective inflators are replaced with safe ones as quickly as possible. NHTSA's Coordinated Remedy Order sets specific deadlines for manufacturers to have a sufficient supply of remedy inflators, addressing the highest risk vehicles first. NHTSA is closely monitoring the progress made to accelerate recall completion rates and the efforts made by the vehicle manufacturers to repair all affected vehicles. As a result of NHTSA's innovative actions, the recall of defective inflators has been accelerated by at least 2 years compared to vehicle manufacturers' remedy programs without the acceleration ordered in the Coordinated Remedy Program.

NHTSA would like to make several points regarding our efforts. First, because Takata agreed to a series of recalls that expand the number of vehicles affected over time, the number of unrepaired vehicles and percentage of repaired vehicles do not accurately reflect the progress being made in remedying vehicles on an accelerated basis. Similarly, direct comparisons between vehicle manufacturers' completion numbers and percentages can be misleading for a variety of reasons including the fact that some vehicle manufacturers only recently recalled vehicles and either have not yet launched the remedy campaign or have done so only recently, while others have been recalling and remedying vehicles for years. These numbers also do not reflect the risk-based approach to remedying affected vehicles, which has concentrated efforts in high absolute humidity regions first while parts supply becomes more established.

Currently, approximately 34 million vehicles are under recall for over 46 million defective air bag inflators. These numbers are different because some vehicles have both driver and passenger air bag inflators that are recalled. So far, more than 16 million air bag inflators have

been remedied, with more than 8 million inflators on each side, i.e., the driver and passenger sides. The overall completion rate is 45.9 percent on the driver side and 35.4 percent on the passenger side.

A chart showing current recall completion data by vehicle manufacturer and inflator type (driver or passenger) is enclosed. This detailed completion rate information, broken down by vehicle manufacturer and inflator type, is updated monthly and made available on NHTSA's website <https://www.nhtsa.gov/recall-spotlight/takata-air-bags>.

In addition, NHTSA does not believe a significant gap exists between the number of inflators under recall and available remedy parts. While developing the Coordinated Remedy Program, NHTSA reached out to potential alternative remedy part suppliers to develop a comprehensive understanding of supply availability, including plans by some suppliers to expand or alter their production capacities in response to the developing Takata recalls. Further, while developing the accelerated remedy schedule, NHTSA communicated with vehicle manufacturers regarding their obligation to repair vehicles in a timely manner and their ability to utilize alternative remedy parts suppliers if necessary. While parts constraints were a serious concern early on, NHTSA nevertheless pressed the vehicle manufacturers to find opportunities to address those constraints, which is reflected in the aggressive remedy schedule set forth in the Coordinated Remedy Order. The vehicle manufacturers have now had ample time to respond to that accelerated remedy schedule and obtain a sufficient remedy parts supply.

NHTSA continues to receive regular updates from both affected vehicle manufacturers and remedy inflator suppliers regarding remedy parts availability. Given the size and global nature of the Takata recalls, it is not possible to have all remedy parts available immediately. However, because parts are continuously being manufactured as more inflators, and vehicles, are recalled, and vehicles are further prioritized based on risk within the priority groups established by NHTSA, the supply production is capable of keeping up with demand. In the limited instances in which a vehicle manufacturer has identified a supply problem, NHTSA has required that the vehicle manufacturer notify NHTSA in advance and obtain approval for a modified remedy launch or completion deadline. To date, NHTSA has granted several requests for limited extensions, which are available for public inspection on NHTSA's website.

Also, NHTSA continues to believe that the phased approach to the recalls best protects the motoring public by ensuring that remedy parts supply is made available first to owners of vehicles at a higher risk for inflator rupture in a crash. NHTSA established the phased schedule based on scientific evidence and by invoking its authority to accelerate recall repairs. The recall and remedy schedule mandated by NHTSA ensures that vehicles with defective Takata inflators are recalled and have replacement parts available before they present a significant risk of harm to vehicle occupants.

NHTSA and the Department share your concerns regarding consumer awareness and the potential for confusion with the Takata recalls. For that reason, NHTSA has made public education and consumer outreach a focal point of its work with the vehicle manufacturers as well as the Independent Monitor (Monitor) commissioned for Takata as part of the Coordinated Remedy Program

In the Consent Orders issued in May and November 2015, NHTSA required Takata to conduct public education and outreach, with input from NHTSA and the Monitor. This work has included testing and implementation of effective messaging and imagery, used by both Takata and vehicle manufacturers, to convey both the problem and the urgency of the Takata recalls. With assistance from the Monitor, Takata has also begun targeted canvassing efforts that enhance public awareness and education while also leading directly to vehicles being remedied.

NHTSA has encouraged the vehicle manufacturers to use creative outreach through non-traditional avenues including at sporting events, through large employers, and developing mobile repair programs. Via recommendations of the Monitor, NHTSA has provided the vehicle manufacturers with recommended communications strategies and messages, some of which are intended to provide a coordinated message to the public in an effort to reduce consumer confusion. NHTSA has also encouraged the vehicle manufacturers to conduct coordinated advertising similar to the joint campaign in the 1990s to put child car seats in the back seats of vehicles and away from front seat air bags.

NHTSA also has sought to communicate directly with the public about these important recalls. NHTSA created a Takata recalls “spotlight” page on its website to provide complete and accurate information and to reduce public confusion. NHTSA also conducted a bus tour through several southern states in summer 2016, to highlight the Takata recalls and conduct Vehicle Identification Number checks that educated car owners to open recalls.

Additionally, NHTSA consistently encourages vehicle manufacturers to adopt and implement all recommendations of the Monitor. A vehicle manufacturer’s compliance with the Coordinated Remedy Program is, in part, based on reasonable efforts of the manufacturer to comply with all requirements of the order and, more importantly, to protect the public from the risk of harm caused by defective Takata air bag inflators. Such efforts are evidenced by the implementation of Monitor recommendations and it behooves vehicle manufacturers to adopt the Monitor’s recommended actions and strategies.

Importantly, Takata’s investigation into the safety of desiccated phase-stabilized ammonium nitrate (PSAN) inflators is ongoing. Pursuant to the November 2015 Consent Order NHTSA issued to Takata, NHTSA can require Takata to declare all desiccated PSAN inflators defective if they are not proven safe by December 31, 2019. Of note, there are five desiccant variations in Takata’s product inventory. Each variant behaves differently and thus requires distinct

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testing and analysis to determine whether it is safe. In coordination with vehicle manufacturers using Takata desiccated PSAN inflators, Takata is engaged in testing and analyzing inflators returned from vehicles on the road, and is also engaged in artificially aging inflators in the lab prior to testing and analysis. NHTSA is monitoring this work via regular updates from Takata to ensure that progress is being made in this area.

Finally, NHTSA affords confidentiality to individuals who submit information pursuant to the Motor Vehicle Safety Whistleblower Act (contained in the FAST Act, Pub. L. 114-94), and considers such information in carrying out its safety mission. NHTSA has also received and is considering several applications for whistleblower awards pursuant to the Act. NHTSA's work on a rulemaking on such awards, as required by the Act, is ongoing. However, a whistleblower may receive an award prior to the issuance of a rule.

Please be assured that NHTSA will continue its vigilant oversight of the Takata recalls. I hope this information is helpful. A similar letter has been sent to Senator Thune.

Sincerely yours,



Jack Danielson  
Acting Deputy Administrator

Enclosure

Takata Recall Completion Data as of June 23, 2017

Manufacturer	DAB PAB <sup>1</sup>	Vehicles Repaired	Completion Percentage
BMW	DAB	139,169	9.90%
BMW	PAB	237,338	35.83%
<b>BMW</b>	<b>TOTAL</b>	<b>376,507</b>	<b>18.21%</b>
DAIMLER VANS	DAB	609	0.56%
DAIMLER VANS	PAB	4,523	11.65%
<b>DAIMLER VANS</b>	<b>TOTAL</b>	<b>5,132</b>	<b>3.50%</b>
DTNA	DAB	893	34.33%
DTNA	PAB	40	1.54%
<b>DTNA</b>	<b>TOTAL</b>	<b>933</b>	<b>17.94%</b>
FCA	DAB	1,591,593	37.97%
FCA	PAB	392,443	7.85%
<b>FCA</b>	<b>TOTAL</b>	<b>1,984,036</b>	<b>21.58%</b>
FERRARI	DAB	NA	NA
FERRARI	PAB	813	28.70%
<b>FERRARI</b>	<b>TOTAL</b>	<b>813</b>	<b>28.70%</b>
FORD	DAB	438,571	32.38%
FORD	PAB	112,437	30.98%
<b>FORD</b>	<b>TOTAL</b>	<b>551,008</b>	<b>32.08%</b>
GM	DAB	17,478	16.34%
GM	PAB	221,952	35.56%
<b>GM</b>	<b>TOTAL</b>	<b>239,430</b>	<b>32.75%</b>
HONDA	DAB	5,616,649	66.29%
HONDA	PAB	4,984,268	53.83%
<b>HONDA</b>	<b>TOTAL</b>	<b>10,600,917</b>	<b>59.79%</b>
JAGUAR LAND ROVER	DAB	NA	NA
JAGUAR LAND ROVER	PAB	4,959	9.04%
<b>JAGUAR LAND ROVER</b>	<b>TOTAL</b>	<b>4,959</b>	<b>9.04%</b>
MAZDA	DAB	134,348	32.85%
MAZDA	PAB	153,568	20.41%
<b>MAZDA</b>	<b>TOTAL</b>	<b>287,916</b>	<b>24.79%</b>
MERCEDES-BENZ	DAB	13,686	1.94%
MERCEDES-BENZ	PAB	NA	NA
<b>MERCEDES-BENZ</b>	<b>TOTAL</b>	<b>13,686</b>	<b>1.94%</b>

<sup>1</sup> DAB denotes Driver Air Bag, PAB denotes Passenger Air Bag.

mitsubishi	DAB	6,748	30.97%
mitsubishi	PAB	24,678	17.95%
<b>mitsubishi</b>	<b>TOTAL</b>	<b>31,426</b>	<b>19.73%</b>
NISSAN	DAB	NA	NA
NISSAN	PAB	444,172	29.89%
<b>NISSAN</b>	<b>TOTAL</b>	<b>444,172</b>	<b>29.89%</b>
SUBARU	DAB	NA	NA
SUBARU	PAB	419,411	38.32%
<b>SUBARU</b>	<b>TOTAL</b>	<b>419,411</b>	<b>38.32%</b>
TESLA	DAB	NA	NA
TESLA	PAB	988	32.69%
<b>TESLA</b>	<b>TOTAL</b>	<b>988</b>	<b>32.69%</b>
TOYOTA	DAB	94,467	63.99%
TOYOTA	PAB	1,789,589	34.34%
<b>TOYOTA</b>	<b>TOTAL</b>	<b>1,884,056</b>	<b>35.16%</b>
VW/AUDI	DAB	77,103	9.51%
VW/AUDI	PAB	7,220	3.72%
<b>VW/AUDI</b>	<b>TOTAL</b>	<b>84,323</b>	<b>8.39%</b>

**OVERALL TOTAL COMPLETION RATE**

<b>TOTAL</b>	<b>DAB</b>	<b>8,131,314</b>	<b>45.85%</b>
<b>TOTAL</b>	<b>PAB</b>	<b>8,798,399</b>	<b>35.35%</b>
<b>TOTAL</b>		<b>16,929,713</b>	<b>39.72%</b>