U.S. House of Representatives
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
June 2, 2015 Hearing:
"An Update on the Takata Airbag Ruptures and Recalls"
NHTSA Administrator Mark R. Rosekind, Ph.D.

Additional Questions for the Record

The Honorable Michael C. Burgess

1. Are all the VIN numbers of affected vehicles subjected to the Takata airbag inflator defects announced May 19th now publically accessible on NHTSA's safercar.gov website? If not, when can we expect all the information to be posted? What vehicle manufacturers have not yet provided this information to NHTSA? What is NHTSA doing to expedite the collection of this information?

   RESPONSE: Yes, all vehicle identification numbers (VIN) for currently affected vehicles with Takata air bag inflators are publicly accessible through NHTSA's VIN lookup tool on safercar.gov. The auto manufacturers have loaded the VINs of the affected vehicles into their recall system databases and consumers can use NHTSA's VIN lookup tool to search those databases.

2. Dr. Rosekind, you testified that "clarity for consumers is critical." Why did NHTSA publically announce the recall before it collected the VIN numbers from automakers of the affected vehicle population? What could NHTSA do differently so consumers could have more information when such a big headline is created?

   RESPONSE: Takata reported the inflator defect to NHTSA on Monday, May 18 and NHTSA announced Takata's defect declaration publicly on Tuesday, May 19. This important safety information could not be withheld from the public knowing that they were at risk. NHTSA simultaneously announced Takata's defect declaration publicly, and launched a consumer-oriented Takata microsite on safercar.gov that is updated in real time to provide consumers with information as soon as NHTSA receives it. Manufacturers gathered the needed VIN numbers within a few weeks and NHTSA ensured the information was available to consumers as soon as it was provided.

   a. Is there anything that prevents NHTSA from making its announcement at a time when consumers can know if they are impacted?

      RESPONSE: Over 15 million consumers had vehicles already subject to Takata air bag recalls at the time that Takata declared a defect. NHTSA's May 19 announcement addressed these known vehicles, and millions more that contained a potentially fatal safety-critical element. The health and safety of the American public demanded that NHTSA tell the public what was known as soon as possible, and without undue delay.

3. Please explain in detail the type of oversight NHTSA is or will be conducting over Takata's testing. Please also provide the names of the individuals at NHTSA (or those who have been independently contracted) who will be conducting this oversight. When will the oversight begin?

   RESPONSE: Prior to the May 19 announcement of the Consent Order, NHTSA had access to testing data from Takata, the Independent Testing Consortium, and other testing being conducted by auto manufacturers. All of this testing had been focused primarily on determining the root cause of ruptures. NHTSA reviewed findings, made unscheduled visits to test facilities to review data and procedures, and was collecting results from all testing sources. After the May 19 announcement and under the terms of the Consent Order, Takata was required to propose a plan to provide NHTSA with test data regarding the service life and safety of the remedy inflators no later than July 17, 2015. Takata must also continue to provide NHTSA all test results and data relating to the recalled inflators. The Consent Order gives NHTSA the ability to direct Takata's testing to focus on both the recalled inflators and those being used as remedy parts. NHTSA is evaluating the Takata testing data that has been provided to date, and will determine what additional testing Takata must undertake. NHTSA's Office of Vehicle Safety will oversee Takata's testing with assistance from individuals across the agency and an expert consultant with many years of experience designing and testing inflators. Additionally, NHTSA has begun its own testing regime whose first objective is to verify Takata's findings.

4. Has NHTSA begun coordinating the prioritization of replacement parts? If not, when will it begin?

   RESPONSE: Yes, NHTSA has begun coordinating the prioritization of replacement parts.

   a. In the interim, what is happening with the replacement parts produced by Takata as NHTSA prepares to serve as coordinator? Are they being distributed to automakers?

      RESPONSE: NHTSA is coordinating the recall of the defective Takata airbags to ensure that those consumers most at risk will receive replacement parts first. Although we do not yet know the root cause behind the Takata air bag ruptures, we do know that the defect is a product of time and exposure to high absolute humidity. NHTSA's goal is to ensure that those vehicles that have been exposed to high absolute humidity for longer periods of time receive a replacement part as quickly as possible. While some of Takata's replacement parts will have to be replaced at a later date, they provide a better interim remedy until a permanent replacement part becomes available. Each affected automaker has been obtaining replacement parts from one or more suppliers. Some automakers are utilizing Takata replacement parts, a portion of which will require a further replacement at a later time; others are utilizing replacement parts produced by suppliers other than Takata.

   b. When will NHTSA be able to produce a timeline that shows public outreach campaigns and replacement part availability for the nation?

RESPONSE: NHTSA has already started meeting with manufacturers and suppliers and will continue to do so throughout July and August to determine the availability of replacement parts for prioritized areas and vehicles that are most at risk. Additionally, pursuant to the Consent Order, Takata is required to submit a plan to maximize recall completion rates for all recalls involving Takata air bag inflators no later than July 17. Takata will prepare a plan for each of the affected vehicle manufacturers without regard to the supplier of the remedy parts. Assuming the affected manufacturers and suppliers provide the information requested by NHTSA through July and August that will be used to develop the replacement plan, NHTSA will hold a hearing or other event in the early Fall to outline the replacement campaign.

5. Dr. Rosekind, you testified that some of the replacement parts are only an interim remedy. Is NHTSA encouraging automakers to tell dealers to warn customers that some of the replacement parts are only an interim remedy?

   RESPONSE: Yes, NHTSA has encouraged automakers to inform both their dealers and their customers of the interim nature of the replacement parts where applicable and to take proactive steps to ensure that they maintain contact with those owners and that the owners know how to stay informed and when to return for a final remedy.

6. What conversations is NHTSA having with automakers about the continued use of these types of ammonium nitrate inflators?

   RESPONSE: NHTSA has exchanged and will continue to exchange information with automakers and tier one suppliers regarding the current and planned design and manufacture of replacement inflators as part of its coordinated remedy process. These discussions are ongoing and the Consent Order now provides a mechanism to be sure testing also focuses on the effectiveness of the remedy.

7. Are vehicle manufacturers providing completion rate data to NHTSA on recalls related to Takata airbag inflator defects? If not, has NHTSA requested that information from vehicle manufacturers?

   RESPONSE: Yes, manufacturers are providing completion rate data to NHTSA on recalls related to Takata air bag inflator defects; and NHTSA will continue tracking these data closely.

8. Dr. Rosekind, you testified that at least 29 different things, including process improvements and other changes, have been made since December 2014 to improve the internal processes at NHTSA. Please list the changes you have made and what measurable difference has been observed from those adjustments or what you expect to see.

   RESPONSE: NHTSA continuously seeks to enhance our processes and procedures, as demonstrated by the attached list of process improvements and our recently published Path

Forward report. The list of process improvements continues to grow and now includes 45 distinct actions implemented and initiated. Also, the recently formed Risk Control and Innovations Program leaders will apply the process improvements agency-wide. The measurable difference falls into the following general categories:

- Improved Oversight;
- Enhanced Training;
- Improved Tracking and Documentation;
- Improved Information Collection;
- Collaboration and Assessment;
- Tougher Enforcement;
- Improved Outreach to Customers.

9. Prior to the Consent Order, did NHTSA conduct any direct oversight of Takata's testing and/or examine the adequacy of the remedy Takata and affected vehicle manufacturers were proposing? If so, what were NHTSA's observations of the testing and adequacy of the remedy? If not, why did it not conduct oversight of the testing or evaluate the adequacy of the remedy?

   RESPONSE: Prior to the Consent Order, NHTSA received Takata test results for returned inflators on a monthly basis and worked to determine risk level based on inflator type and geographic location. NHTSA also visited a Takata testing facility on multiple occasions, including unannounced visits. However, all of this testing had been focused primarily on determining the root cause of ruptures. That changed under the terms of the Consent Order. Now, NHTSA has the ability to direct Takata's testing to focus on both the recalled inflators and those being used as remedy parts. Takata must continue to provide NHTSA all test results and data relating to the recalled inflators, but must also propose a plan to provide NHTSA with test data regarding the service life and safety of the remedy inflators no later than July 17, 2015.

10. Dr. Rosekind, you testified that NHTSA had identified "meaningful pieces" of information in an ongoing review of the 2.4 million documents Takata submitted to the agency. What are those "meaningful pieces" of information?

    RESPONSE: Takata has submitted 3.3 million documents to date. NHTSA is reviewing each of these documents carefully for information that will help determine whether Takata's actions, or inactions, constitute violations of the National Traffic and Motor Vehicle Safety Act. The information NHTSA is extrapolating from these documents will enable us to determine what Takata knew about the use of ammonium nitrate in their air bag inflators, when they knew it, and when Takata determined that there was a safety-related defect.

11. Dr. Rosekind, you testified that due to the Consent Order, NHTSA will be in the "driver's seat" to direct testing. What deficiencies or gaps have you identified in testing to date?

    RESPONSE: Prior to the Consent Order, the focus of testing was determining the root cause of ruptures and not on adequacy of the remedy. The Consent Order changed all that – NHTSA is now focusing the inquiry on the solution. Under the terms of the Consent Order,

Takata must propose a plan to provide NHTSA with test data regarding the service life and safety of the remedy inflators no later than July 17. NHTSA is reviewing all currently available data and information, and will critically evaluate both Takata's and our own testing plans.

a. What new or different tests will NHTSA be performing?

RESPONSE: NHTSA is evaluating a different non-destructive technique to measure inflators. This technique may shorten the preliminary screening process and yield a higher throughput for ballistic testing. More testing is planned once the initial phase is completed.

b. How many inflators will be tested?

RESPONSE: Currently NHTSA has 400 inflators planned for Phase One testing. Results of this testing will further assist NHTSA in verifying the work that Takata has conducted.

c. When will the testing be completed?

RESPONSE: Phase One testing will be completed by the end of July 2015. NHTSA is reviewing all currently available data and information, including Takata's testing plan and our own testing plan, to identify deficiencies and gaps that may require further testing.

d. Who will be conducting the tests?

RESPONSE: NHTSA has a subcontract with Battelle, through the Transportation Research Center, to conduct testing.

12. Does NHTSA have any reports on record of airbags inflators rupturing in the field in the 1990s that contained ammonium nitrate?

RESPONSE: NHTSA is unaware of any reports alleging a 1990s vintage ammonium nitrate based inflator rupture.

13. Is NHTSA aware of any other Takata inflator type, beyond those listed in the Consent Order, that has been the basis for a safety recall in the last 5 years due to the inflator's susceptibility to moisture intrusion, which could lead to an abnormal airbag deployment? If so, please provide the inflator type and the recall ID number.

RESPONSE: All Takata inflator types that NHTSA is aware of that could lead to an abnormal air bag deployment from moisture intrusion are listed in the Consent Order.

14. Dr. Rosekind, you testified that the recalls affecting two passenger inflators (PSPI and PSPI-L) are expected to be national. When will that nationwide recall expansion occur?

RESPONSE: All Takata air bag recalls are already national.

a. In Takata's DIRs, it indicated that the expansion will be based on further testing and analysis. Has that further testing and analysis already been conducted to support the expectation that a national recall will happen? If so, what did the testing and analysis show? When was it conducted?

   RESPONSE: All Takata air bag recalls are already national recalls.

15. When can consumers expect to get a replacement inflator on the passenger side that is not subject to deterioration over time?

    RESPONSE: NHTSA will examine remedy launch estimates and timing as part of the coordinated remedy process, and we will inform affected consumers once that information is known. It is unlikely that all passenger side inflator replacements for the millions of vehicles under recall will be available at the same time, therefore phasing (possibly by vehicle age, inflator type and/or vehicle residency) may be necessary.

16. Please provide an outline of the coordinated remedy program plan detailing when NHTSA plans to meet with suppliers, what suppliers NHTSA will be meeting with, when the joint meetings with suppliers and automakers will take place, and when the public meeting will happen in the fall.

    RESPONSE: NHTSA reached out to the affected manufacturers and suppliers to set up group and individual meetings, and the first of these meetings took place on July 1. NHTSA has contacted six suppliers: ARC, Autoliv, Daicel, Key Safety, Toyoda Gosei, and TRW. Assuming the affected manufacturers and suppliers provide the information requested by NHTSA through July and August that will be used to develop the replacement plan, NHTSA will hold a hearing or other event in the early Fall to outline the replacement campaign.

17. Please provide the names of all the individuals in the group overseeing the logistics of the coordinated remedy program.

    RESPONSE: I personally plan to oversee the coordinated remedy program with assistance from members of NHTSA's Office of Defects Investigation, Office of the Chief Counsel, and other individuals across the agency.

18. When was the contract signed with Batel to conduct testing? What is the testing plan that was agreed to? When will the testing be completed? How many tests will be conducted?

    RESPONSE: NHTSA awarded a testing contract to Transportation Research Center (TRC) on May 4, 2015. TRC has a subcontract with Battelle to conduct the tests. We initiated a multi-phase approach to develop and verify test procedures for non-destructive inspection and ballistic testing. In the first phase, Battelle is conducting non-destructive inspection and ballistic testing of 400 inflators from Takata. We plan to complete this effort in late July 2015. We will determine additional phases of testing after data analysis.

19. When a potential defect in a vehicle has been called to the attention of either the Office of Defect or the Office of Special Crash Investigations, what steps are made by NHTSA to seek out the root cause of the potential defect if one has not been identified?

    RESPONSE: In addition to obtaining information from the affected vehicle manufacturer or supplier, NHTSA also employs field inspections, testing, consumer surveys, statistical analyses, peer comparisons, and other methods of determining root cause.

    a. Does NHTSA rely solely on information and data received by the maker of the potentially defective part or does NHTSA conduct its own separate analysis to confirm or disprove the existence of a defect?

       RESPONSE: No, NHTSA conducts its own analysis, including collecting additional information and verifying information from manufacturers.

    b. Please explain the process by which NHTSA determines the existence of a motor vehicle safety defect and requires the affected original equipment manufacturers to conduct a safety recall. Please explain how NHTSA used this process with respect to the defective Takata airbag inflators.

       RESPONSE: Most safety defect decisions are made by vehicle and equipment manufacturers without NHTSA's influence. However, over the last 10 years, NHTSA has conducted 1,060 defect investigations that influenced 1,889 safety recalls. As NHTSA does not have imminent hazard authority, it relies on its defect investigation process to build a body of evidence to support a defect determination decision.

       With respect to defective Takata inflators affected by long term exposure to high absolute humidity, NHTSA opened an investigation (PE14-016) on June 11, 2014 after identifying 6 incidents of inflator rupture, 3 of which were in NHTSA's database and 3 that were provided by Takata and Toyota. This investigation was upgraded to an Engineering Analysis (EA15-001) and is still open. NHTSA's investigation will remain open until the agency has evaluated the full spectrum of Takata inflators containing ammonium nitrate-based propellant, including current Takata replacement inflators. Please see the enclosed copies of the investigation resumes that contain further explanation.

The Honorable Mike Pompeo

1. Given recent interest in flame retardants in juvenile products and studies showing they have no utility, have you given any thoughts to exempting car seats from having to meet FVMSS 213 since the car is already treated with extensive FR? Does this need to be done legislatively or can it be done through regulation?

RESPONSE: Requiring car seats to be flame resistant serves a safety need. In 2013, NHTSA extensively reviewed the safety and health effects of its flammability requirements for child car seats. NHTSA's review supported continued application of this safety standard.

About 194,000 vehicle fires occur annually in the U.S., resulting in 300 fatalities and 1,250 injuries. Of these, 20 fatalities and 25 injuries involve children 0-5 years old. Most vehicle fire incidents do not result in death or injury. This is partly due to materials in the vehicle, such as seat cushions and upholstery, being required to meet FMVSS 302, slowing the spread of a fire and affording occupants critical time to exit the vehicle. FMVSS 302 is the Federal Motor Vehicle Safety Standard that establishes the flammability resistance requirements, and the child car seat standard (FMVSS 213) incorporates the requirements of FMVSS 302.

NHTSA continues to monitor this issue. If a change to existing requirements is merited, NHTSA can address it in a rulemaking.

The Honorable Jan Schakowsky

1. In November 2014, Honda released the results of an independent audit showing that the company failed to report more than 1,700 claims or notices concerning injuries or deaths, including eight claims involving Takata airbag ruptures. Honda attributed the underreporting to coding errors and an overly narrow interpretation of the Early Warning Reporting (EWR) requirements. In 2004-2005, GM received—but shelved—consumer complaints and field reports about keys being turned during operation and vehicles losing power.

   The Vehicle Safety Improvement Act (VSIA) would strengthen early warning reporting by requiring manufacturers to submit all consumer complaints that might result from defects. The bill would also require manufacturers to include information about fatalities possibly caused by defects, including an assessment of why each incident may have occurred.

   a. In its report, reviewing its actions regarding GM's ignition switch failure, NHTSA discussed improving EWR reporting, is that correct?

      RESPONSE: Yes, NHTSA identified methods to improve reporting in our Path Forward document. Additionally, the Inspector General made 17 recommendations in its June 18, 2015 report, 9 of which relate to EWR. NHTSA has concurred with all 17 OIG recommendations and is committed to addressing each one by June 30, 2016.

   b. In what specific ways can the current EWR requirements be strengthened? Under the VSIA, NHTSA would get more information and more information would be made public. Is that what you mean?

   c. What specific steps is NHTSA taking, independent of Congressional action, to improve Early Warning Reporting?

      RESPONSE 1b and 1c: VSIA, if enacted as currently drafted, would result in more information coming to NHTSA and being made publicly accessible. NHTSA is already taking steps to improve our early warning reporting (EWR) program; we conducted a candid self-assessment of the EWR program and identified areas of improvement in the Path Forward document, including the 9 Inspector General

recommendations related to EWR. NHTSA will provide more clarity to manufacturers about the EWR requirements, and will assist manufacturers as they implement best practices to comply with their obligations.

2. You have spoken before about NHTSA's need for additional resources to fulfill its auto safety mission. If NHTSA had additional resources, exactly how those resources would be used? In which divisions would you increase staff and budget allocation? How would additional resources affect consumer safety?

RESPONSE: NHTSA has provided the following technical assistance to Committee staff on our FY 2016 budget request for increased funding needs for the safety defects investigations program:

Additional FTE for Safety Defects Investigation

NHTSA needs an additional $4.446 million more to fund an additional 28.5 FTE for the Office of Safety Defects Investigation (ODI). The ODI has 8 defect screeners and 4 Early Warning Reporting (EWR) data analysts to identify potential safety defects, and 16 investigators to conduct formal investigations. The additional FTE would be used to process and analyze additional data collected from consumer complaints. Use of data mining software will increase the volume and quality of the information ODI receives, and ODI needs additional FTE to analyze the data. This funding would also support the technical training needs of the office.

ODI would apply the additional 28.5 FTE for the following programs (note that each new employee is counted as ½ FTE for this purpose):

- **Trend Analysis – This is a new office**. NHTSA would use an additional 2 FTE as follows: 2 statisticians and 2 data analysts with experience in standard data analysis and statistical software. This new division would be responsible for overarching, macro trend analysis of all ODI data, other NHTSA databases, and external data sources, with special attention to input from NHTSA's Office of Vehicle Safety Research to identify near term and potential future risk associated with emerging technology. This division would also provide data analysis support to the investigative divisions allowing them to maintain focus on their primary mission.
- **Field Investigation and Testing – This is a new office**. NHTSA would use an additional 4 FTE as follows: 4 engineers and 4 field investigators. The staff would be cross-trained in ODI basic procedures to act as supplemental staff when needed for surges in demand. This request responds to a recommendation of the OIG. This new division would be responsible for conducting field investigation of specific vehicles involved in a crash, fire, or some other consequence of an alleged defect.
- **Certified Project Manager – This is a new position**. NHTSA would use an additional 0.5 FTE for a newly created position. This position would provide, develop and implement a project management approach to ODI investigations, act as the ODI lead for conducting internal, triennial program assessments to capture lessons learned and best practices both internal and external, and apply them where appropriate. The new position would also serve as the information technology system project manager

for ARTEMIS, CIF and any other systems investment that serves ODI lines of business.

- **Early Warning Reporting (EWR)** – There are currently 4 staff in the EWR Office. NHTSA would use an additional 3.5 FTE as follows: 1 mathematical statistician to perform statistical analyses of EWR aggregate data and to perform complex queries on an ad hoc basis as needed; 2 data analysts to perform EWR reporting compliance audits and support data analysis requests in support of open investigations; and 4 safety defect specialists to query all of the EWR looking for potential defect trends including conducting inquiries on 100 percent of all death claims.
- **Vehicle Control** – There are currently 6 staff in the Vehicle Control Office. NHTSA would use an additional 3.5 FTE as follows: 6 engineers to conduct investigations; 1 investigation coordinator to assist with investigation content control, complainant follow up, public file integrity, and to act as a liaison with the FOIA and Communications office, and other coordination functions.
- **Vehicle Integrity** – There are currently 7 staff in the Vehicle Integrity Office. NHTSA would use an additional 3.5 FTE as follows: 6 engineers to conduct investigations; 1 investigation coordinator to assist with investigation content control, complainant follow up, public file integrity, and to act as a liaison with the FOIA and Communications office, and other coordination functions.
- **Defects Assessment** – There are currently 9 staff in the Defects Assessment Office. NHTSA would use an additional 4 FTE as follows: 1 field investigator primarily responsible for conducting local vehicle inspections and dealer site visits, 3 engineers, 1 tire specialist, 1 child passenger safety specialist, and 2 safety defects specialists trained to query and analyze consumer complaints and all available data sources to identify potential safety defect.
- **Recall Management** – There are currently 8 staff in the Recall Management Office. NHTSA would use an additional 3 FTE as follows: 3 program analysts to improve throughput of the growing number of safety recalls and quarterly reports; 2 engineers to conduct recall query investigations concerning scope and remedy adequacy; and 1 safety defects specialist to conduct audits of manufacturers' recall administration.
- **Medium and Heavy Duty Vehicle and Motorcycle** – There are currently 8 staff in the Medium and Heavy Duty Vehicle and Motorcycle Office. NHTSA would use an additional 1 FTE as follows: 1 engineer with experience in crash avoidance technologies to address new and emerging technologies; 1 safety defects specialist with experience in motorcycle design and operation.
- **Correspondence Research** – There are currently 6 staff in the Correspondence Research Office. NHTSA would use an additional 3.5 FTE as follows: 3 writers to prepare responses to incoming correspondence and 1 technical editor with automotive expertise. NHTSA also seeks to add a new branch with 3 staff to address Data Integrity and Records Management shortcomings identified by power users of our public website, the Office of the Inspector General (OIG), and the National Archives and Records Administration.

Safety Defects Investigation Program

NHTSA needs $31.26 million for ODI program costs. This is $21.56 million more than the FY 2015 enacted funding level. The requested increase would enable ODI to improve its effectiveness in identifying safety defects quickly, ensuring remedies are implemented promptly, and informing the public of critical information in an effective manner.

In FY 2016 the Safety Defects Investigation program expects to undertake consumer awareness and outreach campaigns, and continue to improve its public interfaces. A large portion of the data that NHTSA receives about defects in vehicles comes directly from the consumer.

The Safety Defects Investigation program needs to improve its public messaging so that this important source of safety data—consumer input—can be used more effectively. With the additional resources requested, NHTSA would develop and implement a consumer awareness campaign similar to some of NHTSA's better-known safety campaigns addressing seat belts and drunk driving. We expect this campaign to increase the number and quality of safety defect complaints, and increase awareness and responsiveness to recalls. At the same time, the Safety Defects Investigation program would continue to make progress in improving the look, feel and utility of the NHTSA consumer website. The FY 2016 request would enable NHTSA's defects investigation program to improve consumer access to safety information and to further simplify the process for filing defect complaints.

3. The massive scale of the Takata recall has left consumers confused—and manufacturers unsure as to whether Takata can produce replacement parts quickly and safely enough to satisfy demand. In addition, given NHTSA's plan to prioritize repairs in certain parts of the country where the risk of injury or death from the defects is higher, some consumers likely will be unable to have inflators remedied right away.

    a. Do you agree that auto dealers should not be able to loan out cars that are under an existing safety recall without first remedying the defect or non-compliance?

    b. Do you agree that it is not the consumer's responsibility to ensure that a loaner vehicle is safe and not subject to a recall?

    c. Would you support legislation prohibiting auto dealers from providing loaner vehicles with an open safety recall until the defect or non-compliance is remedied?

    RESPONSE 4a, b and c: Yes. Rental and used car dealerships should have the same recall remedy obligations as new car dealers. The GROW AMERICA Act would provide NHTSA with statutory authority to require rental car companies and dealers selling, leasing or renting new and used motor vehicles to remedy defective and noncompliant vehicles before they can make them available for rental, sale or lease to the general public.

    d. Has NHTSA done an analysis and determined that it is safer to drive a car with an airbag subject to a recall than to have the airbag turned off until a replacement airbag is available and if so, is the determination the same for all recalled cars whether the recall is for a driver, passenger, or both airbags?

RESPONSE 4d: Disabling an air bag increases risk for the consumer. Disabling the passenger side air bag is only acceptable if no one will sit in the front passenger seat while the air bag remains disabled. The risk to consumers of disabling their air bags increases because now there is zero protection. Air bags save lives. In 2013, 2388 lives were saved from frontal air bags and from 1987 to 2013, 39,886 lives were saved from frontal air bags.