

September 1, 2021

Dr. Steven Cliff
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Petition for Determination of Inconsequential Noncompliance with FMVSS 209
S4.1 (k) Installation Instructions and (l) Usage and Maintenance Instructions

Dear Dr. Steven Cliff,

Pursuant to the requirements of 49CFR Part 556, Mazda North American Operations ("MNAO"), on behalf of Mazda Motor Corporation of Hiroshima, Japan ("Mazda"), hereby requests exemption from the notification and remedy requirements of the Safety Act 49 U.S.C. Sections 30118(d) and 30120(h) for failure to comply with certain provisions of FMVSS 209, which are identified in the Part 573 report submitted to the NHTSA on August 5, 2021 under NHTSA Campaign Number 21E-072. Mazda believes that the noncompliance in question is inconsequential to motor vehicle safety.

The following pages provide further information on affected vehicles, replacement seat belt assemblies, and reasons in support of the petition. Additionally, a copy of the Non-Compliance Information Report is included for reference. Please contact me at 949-852-7272 should you have any questions.

Sincerely,

Joshua Vella

Director, Quality Office

Mazda North American Operations

(Enclosure) Noncompliance Information Report

Petition

for Determination of Inconsequential Noncompliance with FMVSS 209 S4.1 (k) Installation Instructions and (l) Usage and Maintenance Instructions (Equipment)

September 1, 2021

Description of the Noncompliance

FMVSS 209 Paragraphs S4.1(k) and S4.1(l) require replacement seat belt assemblies to be accompanied by an instruction sheet providing information regarding installation of the assembly in a motor vehicle and regarding the proper use and maintenance for the replacement assembly, respectively.

Due to deviations from established processes, certain replacement seat belt assemblies produced for use in the following vehicles did not include the installation instructions or instructions for proper use and maintenance of the replacement seat belt assemblies. This fails to comply with both S4.1(k) and S4.1(l) of the standard.

MY 2016 – 2021 Mazda2, retailed June 2015 to May 2021

MY 2019 - 2021 Mazda3, retailed February 2019 to May 2021

MY 2014 – 2018 Mazda3, retailed August 2013 to April 2021

MY 2020 – 2021 CX-30, retailed December 2019 to May 2021

** Note 1: All vehicles were produced at Mazda's Salamanca, Mexico plant.

** Note 2: Affected replacement seat belt assembly part numbers are included in the following table as well as in the Noncompliance report submission.

Table 1 – Affected Seat Belt Assemblies

Component	Component	Component Part	Component Production
Name	Description	Number	Range
Seat Belt	BELT'A'(L),FRT SEAT	BDYS57680	2019-01-24 ~ 2021-04-29
Seat Belt	BELT'A'(L),FRT SEAT	BDYS57680A	2020-01-29 ~ 2021-04-28
Seat Belt	BELT'A'(R),REAR SEAT	BDYS57720	2019-01-15 ~ 2021-04-28
Seat Belt	BELT'B'(R),REAR SEAT	BDYS57730A	2019-03-28 ~ 2021-04-29
Seat Belt	BELT(C),RR SEAT	BDYS57740A	2019-01-18 ~ 2021-04-28
Seat Belt	BELT'A'(L),REAR SEAT	BDYS57780	2019-01-15 ~ 2021-04-28
Seat Belt	BELT'B'(L),REAR SEAT	BDYS57790A	2019-03-27 ~ 2021-04-29
Seat Belt	BELT'A'(L),FRT SEAT	BDYT57680	2019-01-15 ~ 2021-04-29
Seat Belt	BELT'A'(L),FRT SEAT	BDYT57680A	2020-01-27 ~ 2021-04-28
Seat Belt	BELT'B'(R),REAR SEAT	BJY657730A	2014-04-06 ~ 2020-08-21
Seat Belt	BELT(C),RR SEAT	BJY657740B	2014-07-14 ~ 2020-08-21
Seat Belt	BELT'B'(L),REAR SEAT	BJY657790A	2014-04-06 ~ 2020-08-21
Seat Belt	BELT'A'(R),REAR SEAT	BJY757720A	2014-07-14 ~ 2021-06-10
Seat Belt	BELT(C),RR SEAT	BJY757740	2014-04-17 ~ 2021-06-10
Seat Belt	BELT'B'(L),REAR SEAT	BJY757790A	2014-07-14 ~ 2021-05-13
Seat Belt	BELT'A'(R),REAR SEAT	DAYA57720	2014-12-04 ~ 2021-04-28
Seat Belt	BELT'A'(R),FRT SEAT	DAYA57730	2014-10-22 ~ 2021-04-28
Seat Belt	BELT(C),RR SEAT	DAYA57740A	2014-07-22 ~ 2021-04-28
Seat Belt	BELT(C),RR SEAT	DAYA57780	2014-10-03 ~ 2021-04-28
Seat Belt	BELT'A'(L),FRT SEAT	DBYP57730	2015-02-27 ~ 2021-04-28
Seat Belt	BELT'B'(R),REAR SEAT	DBYP57740A	2015-02-27 ~ 2021-04-28
Seat Belt	BELT'A'(L),FRT SEAT	DGY157680	2020-01-09 ~ 2021-07-27
Seat Belt	BELT'A'(R),REAR SEAT	DGY957720	2020-01-16 ~ 2021-01-27
Seat Belt	BELT'B'(R),REAR SEAT	DGY957730A	2020-01-08 ~ 2021-03-05
Seat Belt	BELT(C),RR SEAT	DGY957740	2020-01-09 ~ 2021-05-11
Seat Belt	BELT'A'(L),REAR SEAT	DGY957780	2020-03-24 ~ 2021-04-14
Seat Belt	BELT'B'(L),REAR SEAT	DGY957790A	2020-01-08 ~ 2021-04-14
PreTensioner	BELT'B'(R),PRETENSIONER	BDYS57L30	2019-01-22 ~ 2020-12-09
PreTensioner	BELT'B'(L),PRETENSIONER	BDYS57L90	2019-01-18 ~ 2020-12-09
PreTensioner	BELT'B'(L),PRETENSIONER	BDYS57L90A	2020-12-10 ~ 2021-04-28
PreTensioner	BELT'B'(R),PRETENSIONER	BDYS57L30A	2020-12-15 ~ 2021-05-05
Seat Belt	BELT'A'(R),FRT SEAT	BAYS57620 02	2016-09-07 ~ 2021-05-06
Seat Belt	BELT'A'(L),FRT SEAT	BAYS57680 02	2016-09-07~ 2021-05-06
Seat Belt	BELT'A'(R),FRT SEAT	BJY757620 02	2014-01-14 ~ 2021-05-06

Seat Belt	BELT'A'(L),FRT SEAT	BJY757680A02	2015-04-01~ 2021-05-06
Seat Belt	BELT'A'(L),FRT SEAT	DAYA57620	2015-01-12 ~ 2021-05-06
Seat Belt	BELT'A'(R),FRT SEAT	DAYA57680	2015-05-27~ 2021-05-06
PreTensioner	BELT'B'(R),PRETENSIONER	BAYS57L30 02	2016-10-05~ 2021-05-06
PreTensioner	BELT'B'(R),PRETENSIONER	BJY757L30 02	2014-11-06~ 2021-05-06
PreTensioner	BELT'B'(L),PRETENSIONER	BJY757L90 02	2014-07-18~ 2021-05-06
PreTensioner	BELT'B'(R),PRETENSIONER	DAYA57L30B	2015-07-06~ 2021-05-06
PreTensioner	BELT'B'(L),PRETENSIONER	DAYA57L90B	2015-06-15~ 2021-05-06

Notes:

- (1) This issue only involves certain seat belt replacement parts produced at Ashimori Industry Co. Ltd. and Joyson Safety Systems Acquisition.
- (2) Although affected parts are within the production range indicated, not all parts produced in this range have the noncompliance described as production ranges are estimates based on available information at the time of this report submission.
- (3) Mazda estimates an average of 50.9% of replacement parts may have actually been sold with missing instruction sheets based on inspections conducted at parts distribution centers.
- (4) Number of potentially involved replacement parts already sold in the U.S. market is 7,402.

Reasons of Inconsequential Noncompliance

Mazda believes that there are no safety risks associated with this noncompliance.

FMVSS 209 Paragraph S4.1(k) requires that seat belt assemblies sold as replacement equipment have installation instruction to ensure (1) that the correct seat belt is selected as a replacement part and (2) that the seat belt is installed correctly.

(1) Selection of replacement assembly - The Mazda parts ordering system, Global Electronic Parts Catalog ("GEPC"), is an online application used by Mazda dealers which clearly identifies the correct service seat belt components for any given model, model year, and seat position combination. As genuine seat belt replacement assemblies are only available through Mazda's dealer network, all non-dealer installers must order parts through a Mazda dealer. The parts are unique to each belt and designed to assemble properly only in their intended application. When ordering Mazda replacement seat belt parts, the dealer must refer to the Mazda parts catalog to identify the ordering part number with information on the specific vehicle model type, seat location, and model year. Each replacement seat belt assembly is packaged individually with a specific part number label to ensure shipping of the correct parts. Then, the dealer routinely checks to confirm that the part received matches the one ordered. Given the ordering system and process, dealers could select, order, and obtain the correct parts.

(2) **Seat belt installation** - Instructions for seat belt installations are readily available in the Mazda workshop manuals and on the internet for both Mazda dealer and non-dealer technicians. All workshop manual information, including seat belt replacement procedures, are made available to the general public on Mazda's Service Information Web site (https://www.mazdaserviceinfo.com/) and through aftermarket service information services such as Mitchell and Alldata. Therefore, seat belt parts can be successfully installed with information already available even though installation instructions did not accompany the replacement seat belt assemblies.

FMVSS 209 Paragraph S4.1(l) requires (3) instructions addressing the importance of wearing seat belts "snugly and properly located on the body" and information about seat belt maintenance.

(3) **Proper use and maintenance -** Mazda believes that since the instruction for proper use and maintenance is described in the owner's manual which is installed in the vehicle and available on the internet (through https://www.mazdausa.com/owners/how-to-use-my-mazda), incorrect usage and maintenance by the vehicle owner is highly unlikely.

Additionally, the following reasons are included in further support of this petition:

- (4) *Parts compliance with FMVSS 209* Replacement seat belt assemblies meet all FMVSS 209 performance requirements. Replacement parts are produced to the same quality and performance standards as parts installed at the time of vehicle production and come from original equipment suppliers. There is no impact to performance, function, or occupant safety.
- (5) *Field condition and source data records* Mazda is not aware of any customer or field reports of replacement seat belt assemblies being incorrectly installed in the subject applications as a result of installation instructions not accompanying the replacement part. Mazda also is not aware of any reports requesting installation instructions, which is believed to be indicative of the availability of this information from the sources listed above.
- (6) Precedence of previous grants NHTSA has granted similar petitions of noncompliance with seat belt assembly installation and usage instruction standards in at least seven related cases since calendar year 2000. These include the following companies: FCA US LLC (84 Fed. Reg. 20948, May 13, 2019); Mitsubishi Motors North America, Inc., (77 Fed. Reg. 24762, April 25, 2012); Bentley Motors Inc. (76 Fed. Reg. 58343, September 20, 2011); Hyundai Motor Company (74 Fed. Reg. 9125, March 2, 2009); Ford Motor Company on behalf of Jaguar and Land Rover, (73 Fed. Reg. 63051, October 22, 2008); Ford Motor Company, (73 Fed. Reg. 11462, March 3, 2008); Mazda North American

Operations (73 Fed. Reg. 11464, March 3, 2008); and Subaru of America, Inc., (65 Fed. Reg. 67471, November 9, 2000).

Background

Mazda filed a previous similar petition which NHTSA granted on March 3, 2008 (73 Fed. Reg. 11464, March 3, 2008). Mazda remains compliant with processes that were revised in response to the previous petition with existing plants and suppliers both in Japan and in the United States. However, in January 2014, Mazda started Mazda de Mexico Vehicle Operation ("MMVO"), a new vehicle production plant located in Salamanca, Mexico with seat belt assembly suppliers also located in surrounding areas within Mexico. With the MMVO plant coming online and the addition of Mexico based suppliers Ashimori & Joyson, these entirely new business operations and processes became inadvertently non-compliant with the FMVSS 209 requirements. Mazda has implemented process changes at the MMVO plant and related entities to assure ongoing compliance with replacement seat belt assemblies.

Concluding Remarks

Upon discovery of the subject noncompliance, Mazda has taken action to ensure that all replacement seat belt assemblies shipped in the future are packaged with the required installation instructions with respect to our Mexico plant operations. Also, Mazda has corrected all the replacement seat belt assemblies in the inventory for shipment to dealers.

Based on the information available to Mazda, we believe that the noncompliance with FMVSS 209 S4.1 (k) and (1) does not present a risk to vehicle safety and that we should be exempt from the notification and remedy requirements of the Safety Act.

(Enclosure)



Non-Compliance Information Report (Equipment)

August 06, 2021

Equipment Distribution Company

Mazda North American Operations ["MNAO"]
200 Spectrum Center Drive, Suite 100, Irvine, California 92618

Manufacturers of Seatbelt Assemblies

Equipment Supplier #1

Ashimori Industry Company, Ltd. Mario México Sanchez

Circuito San Roque Norte #345 Quality Manager/PSB

Parque industrial Santa Fe Ampliación

Silao, Guanajuato mario.sanchez@ashimorimexico.com

36275 +521 (477) 380 4512

Equipment Supplier #2

Joyson Safety Systems Acquisition Tom

México Villerot

Carretera a Santa Rosa Km 3.5 Executive Director, Sales

 Apodaca, N.L. México
 Tom. Villerot@joysonsafety.com

 66600
 O: 248.340.7628 | C: 248.259.4201

Number Potentially Involved

7,402

Estimated Percentage of Involved Vehicles with Defect

50.9%

Description of Defect or Noncompliance:

FMVSS 209, Paragraph S4.1(k) requires that a seat belt assembly, other than a seat belt assembly installed

in a motor vehicle by an automobile manufacturer, includes instructions providing sufficient information

for installing the assembly in a motor vehicle. Instruction sheets shall include the following statement:

This seat belt assembly is for use only in [insert specific seating position(s), e.g., "front right"] in [insert

specific vehicle make(s) and model(s)].

Paragraph S4.1(1) requires instructions for (1) the proper use of the seat belt assembly, stressing particularly

the importance of wearing the assembly snugly and properly located on the body, (2) the maintenance of

the assembly, and (3) periodic inspection of all components.

Due to insufficient process issues, certain replacement seatbelt parts assemblies were not packaged with

instructions meeting these requirements. As this concern affects certain replacement seatbelt assemblies,

Mazda is submitting this report as an equipment noncompliance.

Applicable FMVSS

FMVSS209 (Seat belt assemblies), Paragraphs S4.1(k) and (l)

Description of Safety Risk

Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provision of 49 CFR Part 556, Mazda intends to

petition NHTSA for an exemption from notification and remedy requirements of 49 U.S.C. Chapter 301 on

the basis that this noncompliance is inconsequential to motor vehicle safety.

Description of Cause

NR (Not Reported)

Identify Any Warning Which Can Precede or Occur

NR (Not Reported)

Affected Component Name / Description / Part Number

Items of affected equipment are replacement seatbelt assemblies intended for use as replacement parts on certain Mazda vehicles. See Table 1 for list of affected seatbelt assemblies.

Table 1 – Affected Seatbelt Assemblies

Component	Component	Component Part	Component Production
Name	Description	Number	Range
Seat Belt	BELT'A'(L),FRT SEAT	BDYS57680	2019-01-24 ~ 2021-04-29
Seat Belt	BELT'A'(L),FRT SEAT	BDYS57680A	2020-01-29 ~ 2021-04-28
Seat Belt	BELT'A'(R),REAR SEAT	BDYS57720	2019-01-15 ~ 2021-04-28
Seat Belt	BELT'B'(R),REAR SEAT	BDYS57730A	2019-03-28 ~ 2021-04-29
Seat Belt	BELT(C),RR SEAT	BDYS57740A	2019-01-18 ~ 2021-04-28
Seat Belt	BELT'A'(L),REAR SEAT	BDYS57780	2019-01-15 ~ 2021-04-28
Seat Belt	BELT'B'(L),REAR SEAT	BDYS57790A	2019-03-27 ~ 2021-04-29
Seat Belt	BELT'A'(L),FRT SEAT	BDYT57680	2019-01-15 ~ 2021-04-29
Seat Belt	BELT'A'(L),FRT SEAT	BDYT57680A	2020-01-27 ~ 2021-04-28
Seat Belt	BELT'B'(R),REAR SEAT	BJY657730A	2014-04-06 ~ 2020-08-21
Seat Belt	BELT(C),RR SEAT	BJY657740B	2014-07-14 ~ 2020-08-21
Seat Belt	BELT'B'(L),REAR SEAT	BJY657790A	2014-04-06 ~ 2020-08-21
Seat Belt	BELT'A'(R),REAR SEAT	BJY757720A	2014-07-14 ~ 2021-06-10
Seat Belt	BELT(C),RR SEAT	BJY757740	2014-04-17 ~ 2021-06-10
Seat Belt	BELT'B'(L),REAR SEAT	BJY757790A	2014-07-14 ~ 2021-05-13
Seat Belt	BELT'A'(R),REAR SEAT	DAYA57720	2014-12-04 ~ 2021-04-28
Seat Belt	BELT'A'(R),FRT SEAT	DAYA57730	2014-10-22 ~ 2021-04-28
Seat Belt	BELT(C),RR SEAT	DAYA57740A	2014-07-22 ~ 2021-04-28
Seat Belt	BELT(C),RR SEAT	DAYA57780	2014-10-03 ~ 2021-04-28
Seat Belt	BELT'A'(L),FRT SEAT	DBYP57730	2015-02-27 ~ 2021-04-28
Seat Belt	BELT'B'(R),REAR SEAT	DBYP57740A	2015-02-27 ~ 2021-04-28
Seat Belt	BELT'A'(L),FRT SEAT	DGY157680	2020-01-09 ~ 2021-07-27
Seat Belt	BELT'A'(R),REAR SEAT	DGY957720	2020-01-16 ~ 2021-01-27
Seat Belt	BELT'B'(R),REAR SEAT	DGY957730A	2020-01-08 ~ 2021-03-05
Seat Belt	BELT(C),RR SEAT	DGY957740	2020-01-09 ~ 2021-05-11
Seat Belt	BELT'A'(L),REAR SEAT	DGY957780	2020-03-24 ~ 2021-04-14
Seat Belt	BELT'B'(L),REAR SEAT	DGY957790A	2020-01-08 ~ 2021-04-14
PreTensioner	BELT'B'(R),PRETENSIONER	BDYS57L30	2019-01-22 ~ 2020-12-09
PreTensioner	BELT'B'(L),PRETENSIONER	BDYS57L90	2019-01-18 ~ 2020-12-09
PreTensioner	BELT'B'(L),PRETENSIONER	BDYS57L90A	2020-12-10 ~ 2021-04-28
PreTensioner	BELT'B'(R),PRETENSIONER	BDYS57L30A	2020-12-15 ~ 2021-05-05

Seat Belt	BELT'A'(R),FRT SEAT	BAYS57620 02	2016-09-07 ~ 2021-05-06
Seat Belt	BELT'A'(L),FRT SEAT	BAYS57680 02	2016-09-07~ 2021-05-06
Seat Belt	BELT'A'(R),FRT SEAT	BJY757620 02	2014-01-14 ~ 2021-05-06
Seat Belt	BELT'A'(L),FRT SEAT	BJY757680A02	2015-04-01~ 2021-05-06
Seat Belt	BELT'A'(L),FRT SEAT	DAYA57620	2015-01-12 ~ 2021-05-06
Seat Belt	BELT'A'(R),FRT SEAT	DAYA57680	2015-05-27~ 2021-05-06
PreTensioner	BELT'B'(R),PRETENSIONER	BAYS57L30 02	2016-10-05~ 2021-05-06
PreTensioner	BELT'B'(R),PRETENSIONER	BJY757L30 02	2014-11-06~ 2021-05-06
PreTensioner	BELT'B'(L),PRETENSIONER	BJY757L90 02	2014-07-18~ 2021-05-06
PreTensioner	BELT'B'(R),PRETENSIONER	DAYA57L30B	2015-07-06~ 2021-05-06
PreTensioner	BELT'B'(L),PRETENSIONER	DAYA57L90B	2015-06-15~ 2021-05-06

Notes:

- (1) This issue only involves certain seatbelt replacement parts produced at Ashimori Industry Co. Ltd. and Joyson Safety Systems Acquisition.
- (2) Although affected parts are within the production range indicated, not all parts produced in this range have the noncompliance described as production ranges are estimates based on available information at the time of this report submission.
- (3) Mazda estimates an average of 50.9% of parts may have actually been sold with missing instruction sheets based on inspections conducted at parts distribution centers during a certain period of time.
- (4) Number of potentially involved quantity indicates parts already sold in US market.

Chronology of Defect

- April 2021: Mazda was first made aware of missing documents in seatbelt replacement parts by Toyota Motor North America, Inc.. Mazda designs, manufactures, and provides field support including replacement parts for the MY2016~2020 Toyota Yaris iA vehicles as part of a joint partnership. Toyota's vehicle shares platforms with the MY2016~2021 Mazda2 produced by the same Mazda plant in Salamanca, Mexico. Mazda began inspections on seatbelt replacement parts supplied to Toyota and confirmed the missing documents on parts stored at Mazda's Chicago Parts Distribution Center (PDC).
- May ~ June 2021: As a preliminary check, Mazda expanded inspections to the remaining U.S. market PDCs for MY2016~2021 Mazda2 vehicles and confirmed the issue across all PDCs. Mazda then began studying and gathering information in preparation to issue countermeasure action to correct the concern internally. During this period, Mazda identified additional replacement parts with the potential concern including MY2014~2021 Mazda3 and

MY2020~2021 CX-30. All vehicles were confirmed to be produced at Mazda's Salamanca Mexico plant. This process concluded June 21, 2021 in which a formal request was issued to affected stakeholders, including inspections for the remaining models, containment action, and rework of replacement parts to bring them to full compliance with FMVSS-209.

July 2021: Inspections across all Mazda PDCs and suppliers were completed.

August 5 2021: Based on the results of these investigations, Mazda determined that certain replacement seatbelt parts assemblies were not packaged with the required instructions, and may not meet the requirements of FMVSS 209, paragraphs S4.1(k) and/or (l).

Description of Remedy Program

Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provision of 49 CFR Part 556, Mazda intends to petition NHTSA for an exemption from notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.

How Remedy Component Differs from Recalled Component

Not applicable.

Identify How and When the Recall Condition Was Corrected in Production

NR (Not Reported)

Description of Recall Schedule:

Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provision of 49 CFR Part 556, Mazda intends to petition NHTSA for an exemption from notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.

Planned Dealer Notification

NR (Not Reported) – NR (Not Reported)

Planned Owner Notification

NR (Not Reported) – NR (Not Reported)

OMB Control No.: 2127-0004

Part 573 Safety Recall Report

21E-072

Manufacturer Name: Mazda North American Operations

Submission Date: AUG 05, 2021 NHTSA Recall No.: 21E-072 Manufacturer Recall No.: NR



Manufacturer Information:

Manufacturer Name: Mazda North American Operations

Address: 1025 Connecticut Avenue, NW

Suite 910 Washington DC 20036

Company phone: 800-222-5500

Population:

Number of potentially involved : 7,402 Estimated percentage with defect : 51%

Equipment Information:

Brand / Trade 1: Ashimori Industry Co. Ltd

Model: Seatbelt Assembly

Part No. : ********

Size: NR Function: NR

Descriptive Information : (1) This issue only involves certain seatbelt replacement parts produced at

Ashimori Industry Co. Ltd..

(2) Although affected parts are within the production range indicated, not all parts produced in this range have the noncompliance described below as production ranges are estimates based on available information at the time of this report submission. Note: Mazda estimates an average of 50.9% of parts may have actually been sold with missing instruction sheets based on inspections

conducted at parts distribution centers during a certain period of time.

Note: Number of potentially involved quantity indicates parts already sold in US

market.

Note: See attached Part 573 Noncompliance Information Report for a complete

list of affected part numbers and details.

Production Dates: APR 06, 2014 - JUL 27, 2021

Brand / Trade 2: Joyson Safety Systems Acq

Model: Seatbelt Assembly

Part No. : ********

Size: NR Function: NR

Descriptive Information:

(1) This issue only involves certain seatbelt replacement parts produced at Ashimori Industry Co. Ltd..

(2) Although affected parts are within the production range indicated, not all parts produced in this range have the noncompliance described below as production ranges are estimates based on available information at the time of this report submission. Note: Mazda estimates an average of 50.9% of parts may have actually been sold with missing instruction sheets based on inspections conducted at parts distribution centers during a certain period of time.

Note: Number of potentially involved quantity indicates parts already sold in US market. Note: See attached Part 573 Noncompliance Information Report for a

complete list of affected part numbers and other details.

Production Dates: JAN 12, 2014 - MAY 06, 2021

Description of Noncompliance:

Description of the FMVSS 209, Paragraph S4.1(k) requires that a seat belt assembly, other than a Noncompliance: seat belt assembly installed in a motor vehicle by an automobile manufacturer, includes instructions providing sufficient information for installing the assembly in a motor vehicle. Instruction sheets shall include the following statement: This seat belt assembly is for use only in [insert specific seating position(s), e.g., "front right"] in [insert specific vehicle make(s) and model(s)].

> Paragraph S4.1(l) requires instructions for proper use of the seat belt assembly, stressing particularly the importance of wearing the assembly snugly and properly located on the body, and on the maintenance of the assembly and periodic inspection of all components.

Due to insufficient process issues, certain replacement seatbelt assemblies were not packaged with instructions meeting these requirements.

FMVSS 1: 209 - Seat belt assemblies

FMVSS 2: NR

Description of the Safety Risk: Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provision of 49 CFR

Part 556, Mazda intends to petition NHTSA for an exemption from

notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis

that this noncompliance is inconsequential to motor vehicle safety.

Description of the Cause: NR

Identification of Any Warning NR that can Occur :

Involved Components:

Component Name: See attached sheet for complete list of affected c

Component Description : See attached sheet for complete list of affected component descriptions.

Component Part Number : See attached sheet for complete list of affected component part numbers.

Supplier Identification:

Component Manufacturer

Name: See attached Part 573 Noncompliance Info

Address: NR

NR

Country: NR

Chronology:

April 2021: Mazda was first made aware of missing documents in seatbelt replacement parts by Toyota Motor North America, Inc.. Mazda designs, manufactures, and provides field support including replacement parts for the MY2016 \sim 2020 Toyota Yaris iA vehicles as part of a joint partnership. Toyota's vehicle shares platforms with the MY2016 \sim 2021 Mazda2 produced by the same Mazda plant in Salamanca, Mexico. Mazda began inspections on seatbelt replacement parts supplied to Toyota and confirmed the missing documents on parts stored at Mazda's Chicago Parts Distribution Center (PDC).

May \sim June 2021: As a preliminary check, Mazda expanded inspections to the remaining U.S. market PDCs for MY2016 \sim 2021 Mazda2 vehicles and confirmed the issue across all PDCs. Mazda then began studying and gathering information in preparation to issue countermeasure action to correct the concern internally. During this period, Mazda identified additional replacement parts with the potential concern including MY2014 \sim 2021 Mazda3 and MY2020 \sim 2021 CX-30. All vehicles were confirmed to be produced at Mazda's Salamanca Mexico plant. This process concluded June 21, 2021 in which a formal request was issued to affected stakeholders, including inspections for the remaining models, containment action, and rework of replacement parts to bring them to full compliance with FMVSS-209.

July 2021: Inspections across all Mazda PDCs and suppliers were completed.

August dd 05 2021: Based on the results of these investigations, Mazda determined that certain replacement seatbelt assemblies were not packaged with the required instructions, and may not meet the requirements of FMVSS 209, paragraphs S4.1(k) and/or (l).

Description of Remedy:

Description of Remedy Program: Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provision of 49 CFR

Part 556, Mazda intends to petition NHTSA for an exemption from notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.

How Remedy Component Differs NR

from Recalled Component:

Identify How/When Recall Condition NR

was Corrected in Production:

Recall Schedule:

Description of Recall Schedule: Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provision of 49

CFR Part 556, Mazda intends to petition NHTSA for an exemption from notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.

Planned Dealer Notification Date: NR - NR Planned Owner Notification Date: NR - NR

Purchaser Information:

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name: NR

Address: NR

NR

Country: NR

Company Phone: NR

^{*} NR - Not Reported