

February 15, 2024

Via U.S. DOT's SLFTS

Docket Management Facility
U.S. Department of Transportation
W12-140
1200 New Jersey Avenue, SE
Washington, D.C. 20590-0001

Re: ARC Automotive, Inc. – Corrected Response to September 5, 2023
Initial Decision – Docket No. NHTSA-2023-0038

Dear Docket Management:

Enclosed for submission to the above-referenced docket is the Public Copy of a corrected version of ARC Automotive Inc.'s comment to the Agency's September 5, 2023 Initial Decision.

On December 18, 2023, ARC submitted the public version of its comment to the docket at www.regulations.gov (Comment ID: NHTSA-2023-0038-0025). ARC recently discovered an error in its comment. Specifically, in reference to the inflator ruptures that were the subject of two Volvo recalls cited in the National Highway Traffic Safety Administration's Initial Decision (Recall Nos. 21V766 and 21V800), ARC's submission inadvertently referred to the "FG2 Twin Inflators" in several places as having been manufactured by Autoliv. As stated in the respective Volvo defect information reports (DIRs), however, these inflators were manufactured by Autoliv's Tier 2 supplier, ZF, not by Autoliv. Volvo's DIRs identify Autoliv as the Tier 1 supplier of airbag modules that were equipped with the subject ZF FG2 Twin Inflators.

Thus, to ensure an accurate record, the following corrections have been made to ARC's previously submitted comment:

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Page	Location	Correction
26	Last paragraph	Correcting “FG2 Twin inflator (Autoliv)” to “the FG2 Twin inflator (ZF)”
27	Table: Row 3, Column 1	Correcting “Autoliv FG2 Twin inflators” to “ZF FG2 Twin inflators”
27	First paragraph	Correcting “The Autoliv FG2 Twin inflators” to “The ZF FG2 Twin inflators”
27	Last paragraph	Correcting “the KSS/JSS and Autoliv inflators” to “the KSS/JSS and ZF inflators”
27	Last paragraph	Correcting “in the subject Autoliv inflators” to “in the subject ZF inflators”
Appendix A, p. 1	Bullet 3	Correcting “Volvo report related to Autoliv’s FG2 Twin inflator” to “Volvo report related to ZF’s FG2 Twin inflator”
Appendix A, p. 1	Bullet 4	Correcting “Volvo report related to Autoliv’s FG2 inflator” to “Volvo report related to ZF’s FG2 Twin inflator” ¹
Appendix A, p. 2	Table: Row 8, Column 3	Correcting “Autoliv FG2 Twin” to “ZF FG2 Twin”
Appendix A, p. 2	Table: Row 9, Column 3	Correcting “Autoliv FG2 Twin Inflators” to “ZF FG2 Twin” ²
Appendix A, p. 2	Table: Row 10, Column 3	Correcting “Autoliv FG2 Twin” to “ZF FG2 Twin”

A confidential version of the corrected comment is being simultaneously submitted to NHTSA under a 49 CFR Part 512 request for confidential treatment. All changes to the ARC’s public comment were made only in the public (i.e., non-redacted) portions of the comment.

¹ Also added “Twin” to name of inflator.

² Also deleted redundant “inflators.”



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Please contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Grigorian".

Christopher H. Grigorian

Enclosure

cc: Ashley Simpson (NHTSA NCC)