



California New Motor Vehicle Board

2016 Industry Roundtable

Industrywide Safety Recall Difficulties

By Jonathan Morrison

Agenda



- Safety Recalls 101
- Abstract Characterization of the Type of Issue
- Massive Increase in Vehicle Safety Recalls
- What Has Changed?
- The Pressure Point: Blind Spots
- Recent Developments
- Moving Forward



Safety Recalls 101

Recalls 101



- National Traffic and Motor Vehicle Safety Act:
 - Authorizes NHTSA to create FMVSS for new vehicles;
 - Provides procedures under which factories recall vehicles and notify vehicle owners and dealers
- Recalls arise for one of two reasons:
 - Vehicle does not comply with an applicable FMVSS
 - Vehicle has a defect related to motor vehicle safety
 - Defect: “any defect in performance, construction, a component, or material of motor vehicle or motor vehicle equipment.”
 - Motor Vehicle Safety: “the performance of a motor vehicle or motor vehicle equipment in a way that protects the public against *unreasonable risk of accidents* occurring because of the design, construction, or performance of a motor vehicle, and against *unreasonable risk of death or injury* in an accident, and includes nonoperational safety of a motor vehicle.”

Recalls



- **Compliance Recalls: Noncompliance with FMVSS (appx. 8% of vehicles; 16% of recalls)**
- **Safety Recalls: Defect related to motor vehicle safety (appx. 92% of vehicles; 84% of recalls)**
- **NHTSA or Automaker can trigger recall after finding cause to do so (vast majority are “voluntary” after pressure from NHTSA).**
- **Once recall determination is made, vehicles are identified, remedies are developed, dealers are trained to perform repairs, and registered owners are contacted using state DMV Records. Or that’s the way it is supposed to work.**

The GM logo consists of the letters 'GM' in a white, bold, sans-serif font inside a black square.

IMPORTANT SAFETY RECALL

October 2013

Dear General Motors Customer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

General Motors has decided that certain 2013-2014 model year Chevrolet Camaro Coupe vehicles fail to conform to Federal/Canada Motor Vehicle Safety Standard 208, for adhesion of the sunshade airbag label.

As a result, GM is conducting a recall. We apologize for this inconvenience. However, we are concerned about your safety and continued satisfaction with our products.

IMPORTANT

- Your vehicle is involved in recall 13284.
- Schedule an appointment with your GM dealer.
- This service will be performed for you at **no charge**.

Why is your vehicle being recalled?

The air bag warning label on the sunshades may not adhere to the sunshade properly and may fall off or begin to peel away from the sunshade. If the labels are missing, the driver or front seat passenger may not have the information to help protect them in a crash.

Recalls



AUTOMOBILE DIVISION
American Honda Motor Co., Inc.
1919 Torrance Blvd., - P.O. Box 2215
Torrance, CA 90509-9870

July 2015

NHTSA Recall 15V-320

IMPORTANT SAFETY RECALL

This notice applies to your vehicle.

Dear

This notice is sent to you in accordance with the National Traffic and Motor Vehicle Safety Act.

What is the reason for this notice?

Honda has decided that a defect which relates to motor vehicle safety exists in certain 2003-2011 model year Element vehicles.

The defect in these vehicles could kill or injure you or other people in your vehicle.

Specifically, in some vehicles, the driver's front airbag inflator could produce excessive internal pressure upon deployment. If an affected airbag deploys, the increased internal pressure may cause the inflator to rupture (break apart) and deploy abnormally. In the event of an inflator rupture, metal fragments could pass through the airbag cushion material possibly causing serious injury or fatality to you or others in the vehicle. Past ruptures like this have killed and injured vehicle drivers.

This recall consolidates all of Honda's previous recalls concerning the driver's front airbag inflator.

Even if your vehicle was previously repaired, your vehicle is still covered by this recall and will need to be repaired again.

Recalls



- **New Vehicle Sales:**
 - Illegal to sell and deliver recalled vehicle prior to remedying defect or noncompliance;
 - Factory must either:
 - Buy vehicle back at dealer cost, plus transportation plus 1% of vehicle cost per month (prorated from recall date); or
 - Provide dealer with parts to repair the vehicle, plus labor, plus 1% of manufacturer's selling price per month (prorated from recall date).
- **Used Vehicle Sales: Specifically exempt from federal recall laws.**



Abstract Characterization of the Type of Issue

- I have yet to see any problem, however complicated, which when looked at in the right way, did not become still more complicated.
-Poul Anderson
- For every complex problem, there is a solution that is simple, neat, and wrong.
-H.L. Mencken

Simple v. Complex v. Complicated



- *Simple Problems* can be solved with a formula that can be followed and repeated with relatively little expertise and be expected to produce roughly uniform results.
- *Complicated problems* have many moving parts, and generally require higher order expertise, but the general problem operates in patterned ways.
- *Complex problems* are imbued with features that operate in patterned ways but involve autonomous actors whose interactions are continually changing.

Simple v. Complex v. Complicated



Following a recipe	Sending a rocket to the moon	Raising a child
Recipes are essential.	Formulae are critical.	Formulae have limited application.
Recipes are easily replicated.	Sending one rocket increases assurance that the next will be ok.	Raising one child gives experience, but no assurance of success with another.
Expertise is helpful but not required.	High levels of expertise in multiple fields needed.	Expertise can contribute but is neither necessary nor sufficient for success.
Produce standardised product.	Rockets are similar in critical ways.	Each child is unique and must be approached individually.
Best recipes give good results every time.	There is a high degree of certainty in the outcome once the original issues are solved.	Uncertainty of outcome remains.

Source: Adapted from Glouberman, S., and Zimmerman, B. (2002)

Simple v. Complex v. Complicated



- Complicated outcomes can be determined with good algorithms, calculations, specifications, implementation. There is a command and control structure.
- Complex outcomes are achieved because they are co-created, collaborative, interactive outcomes that emerged from the system. There is no mission control.

Complex v. Complicated Outcomes



- The recall system, as initially designed, dealt with a complicated problem.
- The current legal/political issues relating to vehicle safety concerns has evolved into a complex problem.
- Multiple, autonomous stakeholders include:
 - The Media;
 - Congress;
 - State Legislatures;
 - NHTSA;
 - The Federal Trade Commission;
 - Automakers;
 - Parts Suppliers;
 - New Car Dealers;
 - Used Car Dealers;
 - Wholesalers;
 - Consumers;
 - Consumer Groups; and
 - Attorneys of all flavors.

Complex v. Complicated Outcomes



- Each stakeholder is legitimately and genuinely concerned with safety, but has their own interests and agendas.
- As policymakers look to address genuine concerns with safety recall issues, they need to examine the issue as a *complex* system, and not merely as a *complicated* one.
- A workable solution cannot be engineered or designed, but must be developed and enabled.



Massive Increase in Vehicle Safety Recalls

Recalls



■ Vehicle Safety Recalls 2009-2015

Year	Recalled Vehicles*	New Vehicle Sales**
2015	51,259,648	17,470,659
2014	50,989,948	16,522,663
2013	20,252,849	15,581,519
2012	16,486,229	14,492,277
2011	13,807,119	12,778,940
2010	19,691,419	11,590,274
2009	16,125,894	10,431,509
Total	188,613,106	98,867,841

*Source: 2015 NHTSA Recall Annual Report
**Source: Automotive News

■ Entire United States Light Duty Fleet: 253,000,000 (IHS Automotive)

Toyota Recalls 2009-2010



- 7.5 Million U.S. Vehicles with 37 deaths
- November 2, 2009: Recall to correct a possible incursion of an incorrect or out-of-place front driver's side floor mat into the foot pedal well, which can cause pedal entrapment.
- January 21, 2010: After some crashes were shown not to have been caused by floor mat incursion, a recall was issued to address possible mechanical sticking of the accelerator pedal causing unintended acceleration.
 - Many alleged that problems related to the electronic throttle control system were to blame.

Toyota Recalls 2009-2010



- In February 2011, NHTSA and NASA released the results of a 10-month study, requested by Congress, into the main cause for unintended acceleration. The study concluded that there was no electronic cause for unintended acceleration, that the most common problem was “pedal misapplication,” and that the floor mat and gas pedal problems previously identified were actual causes.
- In October 2013, an Oklahoma jury found Toyota’s electronic throttle control system to be a possible cause of an accident.
- In March 2014, the U.S. Department of Justice imposed a \$1.2 Billion criminal penalty for misleading the public and failure to report information.

Honda Airbag Recalls



- 8.5 Million Vehicles (of 25 Million total) with 9 deaths (of 10 total).
- June 2014: Honda announces three recalls of 2001-2011 MY vehicles for issues related to suspected defective airbag inflators:

2001-07 Accord 4 cyl.
2001-05 Accord V6
2001-05 Civic
2002-06 CR-V
2003-11 Element
2002-04 Odyssey
2003-07 Pilot
2006 Ridgeline

Honda Airbag Recalls



- The recall and subsequent instructions informed dealers that only certain VINs would be covered under the recall, but that these VINs were not yet known.
 - VINs were not identified until August 2014
- In the meantime, dealers were instructed to inform all service customers of *potentially* affected vehicles of the fact that they may have defective airbag inflators.

Honda Airbag Recalls

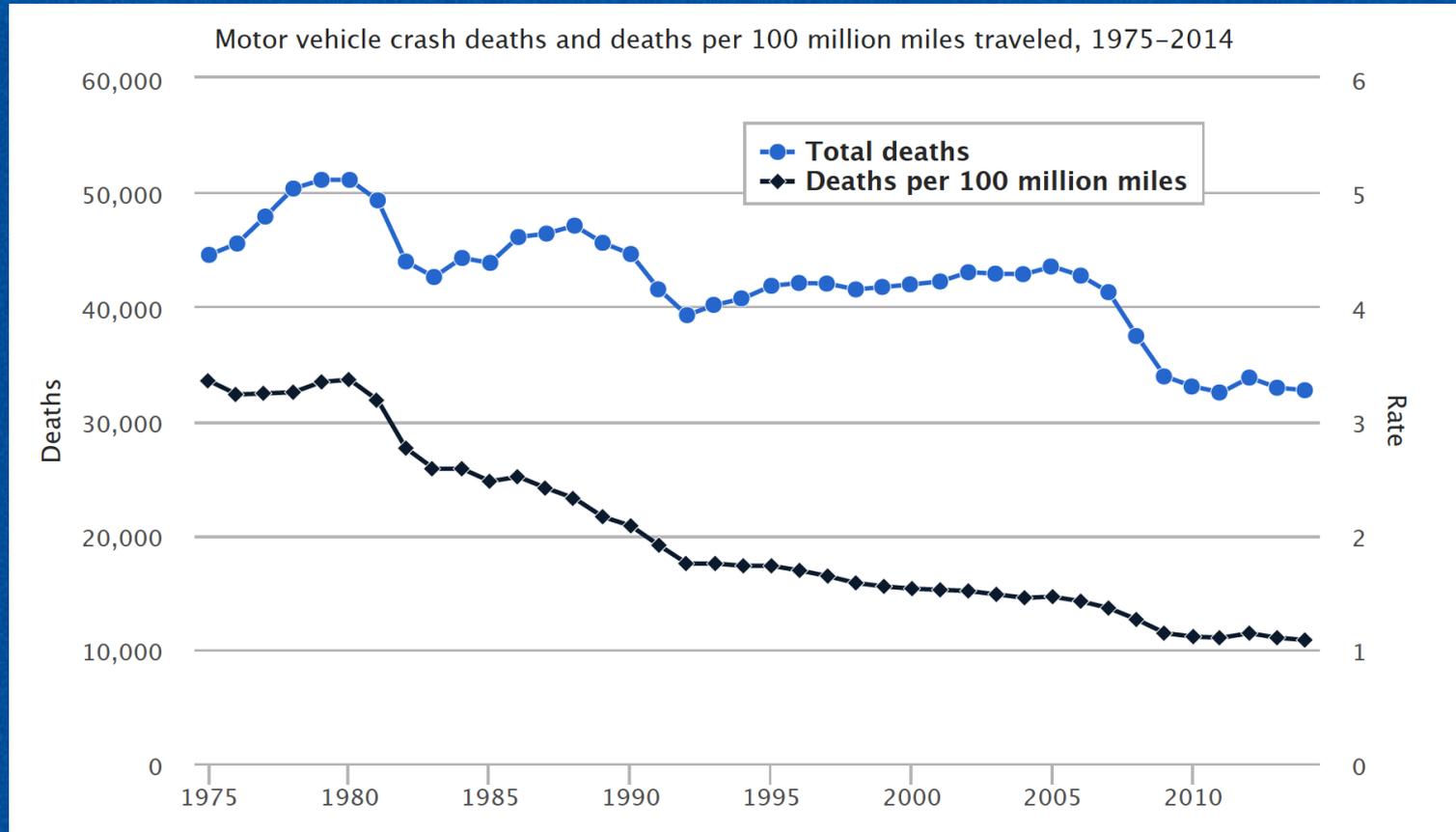


- The recall and subsequent instructions announced that replacement parts were not yet available.
 - Parts did not begin to trickle in until September 2014, and Honda notified customers on a rolling basis to manage parts supply.
- The recall has been expanded on a number of occasions.



What's Changed?

Are Cars Less Safe?



Media Focus



The New York Times

-September 30, 2009

Toyota Seeks Solution to Floor-Mat Issue

-November 4, 2009

Safety Agency Rebukes Toyota Over Floor-Mat Issue
“Clarence Ditlow, the executive director of the Center for Auto Safety, an advocacy group, said he could not recall any other case in which the safety agency had publicly chastised an automaker in such a manner.”

-November 26, 2009

Gas Pedals That Stick Force Recall of Toyotas

-February 9, 2010

Safety Agency Scrutinized as Toyota Recall Grows
“Members of Congress, independent experts on auto and others say they want to know why the agency did not act more aggressively in investigating Toyota’s problems.”

-February 16, 2010

U.S. Wants to Know When Toyota Knew of Problem

-April 29, 2010

Congress Sets Hearing on Expanded Oversight of Auto Safety

Media Focus



- Issues related to the Toyota Recall and allegations of an unintended acceleration crisis were *heavily* covered.
- Project for Excellence in Journalism News Coverage Index:
 - January 25-31, 2010: #5 Issue
 - February 1-7, 2010: #2 Issue
- In addition to shining spotlight on Toyota, media focused on NHTSA's lack of aggression in investigating and fining Toyota.

Congressional Scrutiny



- February through April 2010: Various Congressional Committees held hearings into the unintended acceleration issue and NHTSA's response to complaints and information that could have led to earlier activity.
- A common refrain: both Toyota and NHTSA should have been far more proactive.

Automaker Pressure



- Congressional and media scrutiny of Toyota and NHTSA has led to an incredible amount of pressure on automakers to announce potential safety issues and recall vehicles in advance of identifying a feasible solution, manufacturing replacement parts, or identifying affected vehicles.



The Pressure Point: Blind Spots

Profiles of the Players



- **NHTSA: FY 2016 Budget: \$903,000,000**
- **Toyota Sales Revenue: \$248 Billion**
- **General Motors Sales Revenue: \$152 Billion**
- **Honda Sales Revenue: \$118 Billion**

- **Average New Car Dealer Sales Revenue: \$49 Million**
- **Average Used Car Dealer Sales Revenue: \$4.7 Million**

Recall Status Information



- Recall notices are sent by the automaker to franchised dealers and consumers using lists of registered owners compiled by or through state DMVs.
- When a customer trades in a vehicle to the dealership, the dealership (generally) does not change the registered owner listing with the DMV, but the vehicle is transferred (and wholesaled) on an open title.
 - This means that the current registered owner receives the recall notification, and not the dealer.

Recall Status Information



- Proper handling of recalls (as determined by any potential federal or state law, franchise agreement, or dealership policy) requires access to current information, by VIN, on vehicles subject to recall.
- This information would be updated immediately after a recall remedy is performed.
- With this information, a dealer could properly monitor their inventory for vehicles subject to recall, and make a determination of how to manage that vehicle.
- Without this information, a dealer is stuck.

Vehicle History Reports



- Commercial Vehicle History Providers make recall information available through their reports.
- Report providers can provide useful tools, such as generating inventory reports on a periodic basis.
- But the accuracy and timeliness of the data depends entirely upon commercial relationships with each individual automaker.
- These relationships vary greatly.

Factory Notices



[Next Unread Message](#) **View Message**

Sent on 06 24 2014 **Expires on** 07 07 2014

From American Honda Parts & Service Division, Campaign Administration

Subject Stop Sale: 2001-11 Multi-Model Driver and Passenger Airbag Inflator

DATE: June 23, 2014

TO: All Honda Sales, Service & Parts Managers and Personnel
FROM: American Honda Parts & Service Division, Campaign Administration
RE: Stop Sale: 2001-11 Multi-Model Driver and Passenger Airbag Inflator

Beginning immediately, the following model/model year range vehicles are subject to a stop sale order:

- 2001-07 Accord 4-cylinder
- 2001-05 Accord V-6
- 2001-05 Civic
- 2002-06 CR-V
- 2003-11 Element
- 2002-04 Odyssey
- 2003-07 Pilot

Certain vehicles within the above model/model years are subject to one or more of three recalls that were announced today. Do not sell any of these vehicles until Honda has provided you with an appropriate disclosure and acknowledgment form, which we anticipate will be provided by close of business on Wednesday, June 25, 2014.

The recalls announced today involve driver's or passenger's front airbag inflators, which in a crash may deploy with too much pressure, causing the inflator casing to rupture and eject metal fragments that could injure or kill vehicle occupants. While two of the recalls only affect vehicles sold or ever registered in certain states/territories, vehicles that currently are registered in other states/territories may also be affected if they were at one time registered in the affected states/territories. Accordingly, until we are able to obtain specific information on which particular VINs are affected, we can only address the recalls on a model and model year basis. In addition to the lack of VIN information, replacement parts have yet to be made for these recalls, and due to the volume of affected vehicles (of both Honda and other brands), parts may not be available for some time.

Due to these unique circumstances, Honda is implementing a strategy to handle units on stop sale as well as customer-owned vehicles that come in for service. An update to this action will be provided by the close of business on Wednesday, June 25, 2014.

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Factory Notices



- Can be non-specific or “rolling”
- Only goes to franchised dealers

Factory Portals



- Automakers have their own portals, which franchised dealers can use to identify vehicles in their inventory subject to recall.
- This information is only updated once a recall is performed and a claim processed, which can take a week or more.
- Many of these portals are not available on weekends, but dealers are generally open all seven days.
- Only franchised dealers have access to this internal information.

NHTSA VIN Portal



- The 2012 Federal Highway Bill required NHTSA to make recall information available to the public, searchable by VIN, including information about unremedied recalls.
- In late 2014, NHTSA issued regulations to require large automakers (over 25k sales annually) to make this information available on their websites free of charge, updated at least weekly.
- NHTSA established its own recall portal to allow the public to type a VIN and determine a vehicle's recall status.

NHTSA VIN Portal



Recalls Look-up by VIN - Vehicle Identification Number

[Print](#) 

Owners may not always know their recalled vehicle still needs to be repaired. NHTSA's new search tool lets you enter a Vehicle Identification Number (VIN) to quickly learn if a specific vehicle has not been repaired as part of a safety recall in the last 15 years.

Enter VIN here:

I'm not a robot 
reCAPTCHA
[Privacy - Terms](#)

What this VIN search tool covers:

- Safety recalls that are incomplete on a vehicle
- Safety recalls conducted over the past 15 calendar years
- Safety recalls conducted by major light auto automakers, including motorcycle manufacturers.

What this VIN search tool does NOT cover:

- Completed safety recall information
- Manufacturer customer service or other non-safety recall campaigns
- International vehicles
- Very recently announced safety recalls for which not all VINs have been identified
- Safety recalls that are more than 15 years old (except where a manufacturer offers more coverage)
- Safety recalls conducted by small vehicle manufacturers, including some ultra-luxury brands and specialty applications

NHTSA VIN Portal



- The VIN portal only allows for searches on an individual vehicle basis—meaning dealers cannot run their inventory against the recall database.
- Unfortunately, system stability can be lacking both to individual automaker information, and as a whole.
- Even when working properly, the VIN portal requires entering CAPTCHA codes for each search.
- Information is not updated in realtime—a dealer can perform the remedy, but the automaker’s internal record will not be updated until the claim is processed.

NHTSA VIN Portal



- Even after the claim is processed, the VIN portal information may not be updated for up to a week—meaning up to a two week lag can be involved from the time the repair is performed.
- This can be an eternity in the car business—particularly if a dealership will not purchase or sell a vehicle subject to an open recall and relies upon the VIN portal for such clearance..



Recent Developments

“Stop Sale” Recalls



- At least three automakers have issued recalls in the past year, instructing dealers not to sell recalled used vehicles, *either at retail or wholesale.*
- The reasons?
 - Safety;
 - Product Control;
 - Product Liability?
- Affected dealers are left with inventory on their lots that they are legally allowed to sell, but for which the automaker announced that they will not provide **indemnification.**

“Stop Sale” Recalls



- Impacts:
 - Clogged inventory;
 - Storage issues—particularly in urban areas;
 - Frozen Working Capital;
 - Depreciation;
 - Devaluation;
 - Floorplan costs;
 - Trade devaluation:
 - Lost customers;
 - Increased likelihood of negative equity;
 - Increased likelihood of difficult financing.

Recalls Without Fixes



- Pressure from NHTSA has led to factories recalling vehicles without identifying remedies, or having available parts.
- Often, affected vehicles are not yet identified—only an announcement that “certain” vehicles of a particular make and model will be affected.
- This leaves dealers without the ability to effectively manage the recall, and consumers in a state of anxiety.

Parts Constraints



- Once replacement parts are available, they must be divvied up.
- For older Used Cars, they need to have enough parts to spread around to all of their franchised dealers in order to satisfy demand.
- For parts being replaced on vehicles still in production, the factory must produce enough parts to satisfy demand for their franchised dealers *and* to manufacturer new vehicles.

Parts Constraints



- With an existing pool of recalled vehicles, particularly with a highlight publicized recall, replacement parts shortage is an enormous problem.

TOYOTA		SPECIAL ACTIVITY WEEKLY DEALER UPDATE					TOYOTA			
Current Campaign Parts (MAC or DOS) as of 3/15/2016										
Part Number	Analyst Code	Special Activity Description	SSC#	Dealer Ordering Instructions			MAC Release Contact	Inventory Status	ETA and Additional Information <small>In stock = inventory available and/or in-transit to all PDC locations. Limited = inventory is low and/or parts in-transit to some or all PDC locations.</small>	Date Added to MAC Report
				Dealer MAX Quantity	Dealer Order Frequency	DOS or MAC Code				
04005-02702	60	Corolla & Avalon Airbag Sensors	DSB/ESG	1	Daily	DOS	Activity launched in High Absolute Humidity areas, as well as CAT, NY, BN, LA & SF only.	Limited	If additional parts are needed for vehicle in Remedy Phase, please utilize Special Request process through your Region Customer Support Leader.	Updated 02/25/16
04005-02101				3						
04005-02301				1						
04002-66112				1	Weekly					
04003-2810C	62	Airbag Inflator Assy	DSF/E04	100	Weekly	DOS	No Contact. Parts are systematically released based on dealer order limits.	Limited	If additional parts needed, please utilize Special Request process through your Region Customer Support Leader. **CSL's send Special Requests to mac@toyota.com **	Updated 2/3/16
04003-28101				10						
04003-28102				20						
04004-75201				Various	Daily					
04004-75202										
04004-7520C										

- How is a dealer, morally, to handle customer demand—do they order their daily allotment and keep a few extras for walk-ins, or schedule them all?

Over-specific Mandates



- 2016 Recall Instructions For Service Department:

What verbiage should be included on the Repair Order?

“Customer advised that:
The vehicle is subject to a recall affecting the driver’s front airbag inflator. Redesigned driver airbag inflators are not available for installation at this time. Once redesigned parts are available, the registered owner of the vehicle will receive notice to bring the vehicle in for replacement of the component.”

Awkward Mandates



- 2016 Recall Instructions For Service:
 - Loaner Cars

Required Verbiage to be included on Repair Order by applicable situation:

Use this statement if customer leaves vehicle at your dealership:

“Customer advised that:

The vehicle is subject to a recall affecting the driver’s front airbag inflator. Redesigned driver airbag inflators are not available for installation at this time. The customer has been provided a loaner vehicle while they wait for redesigned parts to become available. **Once the vehicle has been repaired the dealer will contact you.**

Use this statement if customer retains possession of their vehicle:

“Customer advised that:

The vehicle is subject to a recall affecting the driver’s front airbag inflator. Redesigned driver airbag inflators are not available for installation at this time. The customer has been provided a loaner vehicle while they wait for redesigned parts to become available. Customer has also elected to retain possession of their vehicle and has signed the “HONDA TAKATA AIRBAG INFLATOR REPLACEMENT VEHICLE RETENTION/STORAGE OWNER INDEMNIFICATION AGREEMENT”. Once redesigned parts are available, you will be contacted by this dealership to bring the vehicle in for replacement of the component.”

Awkward Mandates



HONDA

AUTOMOBILE DIVISION
American Honda Motor Co., Inc.
1919 Torrance Blvd., - P.O. Box 2215
Torrance, CA 90509-9870

_____, 2016
(insert month and date)

HONDA TAKATA AIRBAG INFLATOR REPLACEMENT VEHICLE RETENTION/STORAGE OWNER INDEMNIFICATION AGREEMENT

I, _____, am the owner/lessee of a _____ model year Honda
(insert name) (insert model year)
_____, VIN _____
(insert make) (insert Vehicle Identification No.)

("Subject Vehicle").

I am aware that the Subject Vehicle is subject to an important safety recall notice issued by American Honda Motor Co., Inc. ("Honda").

I am aware that Honda has decided that a defect which relates to motor vehicle safety may exist in the Subject Vehicle. In some vehicles, the driver's or passenger's front airbag inflator could produce excessive internal pressure upon deployment. If an affected airbag deploys, the increased internal pressure may cause the inflator to rupture and deploy abnormally. In the event of an inflator rupture, metal fragments could pass through the airbag cushion material possibly causing serious injury or fatality to vehicle occupants.

I understand that the Subject Vehicle's driver's and/or passenger's front airbag inflator is required to be replaced under the recall described above ("Subject Recall Repair"). I also understand that the replacement airbag inflator needed to make the Subject Recall Repair is not available at this time. I have therefore elected to drive a loaner car provided through an authorized Honda dealership ("Dealership") until the Subject Recall Repair(s) can be completed.

I also understand that Honda's policy is that the Dealership retain the Subject Vehicle at the Dealership until the parts necessary to complete the Subject Recall Repair are available.

I wish to retain the Subject Vehicle in my possession until the parts necessary to complete the Subject Recall Repair become available. I understand this deviates from Honda's requirement that the Dealership retain the Subject Vehicle. In order to obtain the consent of Honda and the Dealership to my retention of the Subject Vehicle until the parts become available for the Subject Recall Repair(s), I specifically and knowingly make the following agreements:

- I agree to not drive the Subject Vehicle while it is in my possession, custody, or control until the Subject Recall Repair is completed other than directly to or from the Dealership.
- I agree to not allow the Subject Vehicle to be driven by others, and will ensure that all keys/key fobs to the vehicle are inaccessible to all others, until the Subject Recall Repair is completed.
- I agree either to drive the Subject Vehicle directly to its place of storage or to allow the Dealership to tow the Subject Vehicle from the Dealership to my home, at no cost to me.
- I agree either to drive the Subject Vehicle directly to the Dealership or to allow the Dealership to tow the Subject Vehicle to the Dealership after the Dealership notifies me that the parts necessary to complete the Subject Recall Repair have become available, at no cost to me.
- I agree to maintain possession of the Subject Vehicle and will not sell, alter, or modify the Subject Vehicle until such time as the Subject Recall Repair is performed.
- Should I lose possession of the Subject Vehicle before the Subject Recall Repair is performed, I agree to notify the Dealership immediately, and no later than 24 hours after I have lost possession of the Subject Vehicle.
- I agree that I will be responsible if I cause the Subject Vehicle to be driven other than directly to or from the Dealership prior to the performance of the Subject Recall Repair.

MY SIGNATURE BELOW INDICATES MY AGREEMENT:

Name (sign name)

Name (print name)

Address

Telephone Number

Status i.e., owner, lessor, lessee, etc.

Shenanigans



- Parts catalogue price reductions announced just prior to a recall.
- Reduced “book time” for recall remedies.



Moving Forward

- Policymakers should not treat this complex situation as merely complicated.
- Oversimplifying recalls will lead to a public policy disaster.
- Aggressive pressure on NHTSA is leading to hasty recall announcements that are causing more harm than good.

- Qualitative differentiation of recall seriousness should be a goal of NHTSA and automakers, cooperatively.
 - “Recall fatigue” is a real concern.
- Factories should consult with their dealers, be cautious with “Stop Sale” instructions, and continue support.
- The industry desperately needs improved access to current recall information.
- The former “moving the metal” era of dealership operations is bygone.



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