

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**IN RE: TAKATA AIRBAG PRODUCTS
LIABILITY LITIGATION**

Case No. 1:15-md-02599-FAM

**THIS DOCUMENT RELATES TO:
ECONOMIC LOSS TRACK CASES AGAINST
BMW, HONDA, MAZDA, NISSAN, SUBARU,
AND TOYOTA DEFENDANTS**

OUTREACH PROGRAM UPDATE

Section III.B.1 of the Settlement Agreements involving BMW, Honda, Mazda, Nissan, Subaru, and Toyota provides that “Updates to the Outreach Program shall be posted on the Settlement website.”

1. The Outreach Programs have been designed so that, to the extent possible, they will benefit from the collective aggregation of recall efforts across all of the settling OEMs, providing for significant economies of scale otherwise not available and resulting in more cost-effective outreach to consumers within the budgetary constraints set forth in the Settlement Agreements.
2. While the Outreach Programs will evolve over the term of the Settlement Agreements, they have been initially designed to use both traditional efforts, such as mailers, inbound and outbound call, and email, as well as non-traditional outreach efforts, including social media outreach and multi-media channels.
3. The target audience of consumers with vehicles with Takata inflators that have not yet been repaired has been segmented based on a variety of demographic and psychographic indicators to understand what channels, cadences, and creative assets may best generate a

comprehensive and accurate understanding and appreciation of the severity and urgency of the Takata recall.

4. Specific campaign strategies have been developed to target different consumer populations as per the segmentation analyses contemplated above. Such campaign strategies use different channels (mail, outbound call, email, etc.) and cadences (timing and frequency of outbound attempts) personalized and tailored to accommodate the preferences of the targeted consumer to achieve the highest recall remedy rate practicable.

5. Moreover, specific creative assets, including mailers, emails, and social media content, have been developed based on the unique characteristics of individual subgroups of the overall targeted population to ensure that personalized and relevant messaging, graphics, and content are used to increase awareness and understanding of the recall.

6. By way of machine learning, the results of the efforts described above will be aggregated and monitored over time to determine which channels, cadences, and creative assets have been most successful in increasing the recall remedy rate so that those activities can be leveraged in ongoing outreach campaigns to continually improve the process over the term of the Settlement Agreements.

7. In addition to the direct outreach efforts described above, the Settlement Special Administrator is also currently considering the following general activities to improve overall understanding of the Takata recall:

A. Mass marketing, including public relations campaigns, public service announcements, and general advertising

B. Social influencers to reach key segments of both known and unknown consumer bases

- C. Consumer research to better understand how to motivate affected consumers to have their Takata inflators repaired
8. Furthermore, the Settlement Special Administrator is also currently contemplating the following activities to further increase the recall remedy rate:
- A. Door-to-door canvassing to alert affected consumers of the outstanding Takata inflator recall associated with their vehicles
 - B. Engaging with third party dealers, auction houses, and independent repair facilities to either notify affected consumers of the recall and/or to provide a service whereby affected vehicles may be repaired while still on site at the dealer, auction, or repair location, before the vehicle is placed back into use
 - C. Implementing a mobile repair option to alleviate concerns of affected consumers who may not have the time or ability to bring their vehicles to a dealer to have the repair completed
 - D. Conducting outreach with and on behalf of OEM-associated dealers which have a unique and specialized association and knowledge of the affected consumers within their specific communities
9. Lastly, the Settlement Special Administrator is currently considering several different potential data append sources and hygiene processes to improve visibility into the contact information and location of consumers to better reach those individuals who have not yet had their Takata inflators repaired.

Date: June 11, 2018