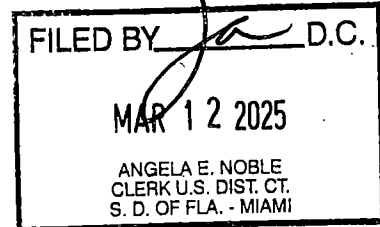


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

IN RE: TAKATA AIRBAG PRODUCTS
LIABILITY LITIGATION

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

THIS DOCUMENT RELATES TO:
ECONOMIC LOSS TRACK CASES AGAINST
FORD AND VOLKSWAGEN DEFENDANTS



**REPORT BY THE SETTLEMENT SPECIAL ADMINISTRATOR ON THE
IMPLEMENTATION OF THE OUTREACH PROGRAMS PURSUANT TO THE FORD
AND VOLKSWAGEN SETTLEMENT AGREEMENTS**

STATUS REPORT NO. 28 FILED MARCH 10, 2025

The Settlement Special Administrator of the Ford and Volkswagen Settlement Agreements (collectively, the “Settlement Agreements”) submits this Report to the Court to provide information and insight as to the ongoing efforts of the Outreach Programs under the Settlement Agreements¹.

As explained in further detail below, the Outreach Programs have been designed through discussion with the Parties, the National Highway Traffic Safety Administration, and the Independent Monitor of the Takata recalls to utilize techniques and approaches not previously applied in the recall industry, with a focus on personalized, targeted direct campaigns aimed at increasing the volume of outreach attempts per consumer via traditional and non-traditional channels with the goal of maximizing the recall remedy completion rate to the extent practicable given the applicable provisions of the Settlement Agreements. Consistent with this, the Settlement Special Administrator and Outreach Program vendors regularly confer and communicate with the

¹ The data and information contained in this report is generally as of mid-Q1 2025.

automobile manufacturers to coordinate concerted efforts to ensure that outreach to affected vehicle owners is conducted as efficiently and as effectively as possible and to continually improve the overall process.

1. Direct Outreach

a. Current and Future Campaigns in Direct Outreach to Affected Consumers

The Settlement Special Administrator and Outreach Program vendors continue to deploy various direct outreach activities which have been discussed in prior Status Reports, including vehicle tagging and specific thematic materials by mail and email (including but not limited to “new owner” creative, “personal agent” creative, “missed appointment” creative, “mobile repair” creative) that have traditionally performed best in terms of response, appointment, and remedy rates, all of which have been described extensively in prior Reports.

In addition to those Outreach types which are continually used and rotated on a periodic basis, the Settlement Special Administrator and Outreach Program vendors have teamed up with a prominent, national automotive insurance company to implement a unique technique to notify drivers of open Takata recalls on their covered vehicles. This insurer has a phone application that offers its insureds access to insurance cards and policy information, the ability to pay bills, and a variety of other services. The Settlement Special Administrator and Outreach Program vendors, in conjunction with the manufacturers, developed a Takata recall notification that the insurer sent to its insureds who have vehicles with open Takata recalls through this phone app. This thereby effectively created a new channel for this type of outreach that had not been used in the past, which helps to strengthen the legitimacy and seriousness of the Takata recall when recipients continue to receive these types of notifications through so many different avenues.

Additionally, the Settlement Special Administrator and Outreach Program vendors have begun to use personalized videos in email outreach communications to affected vehicle owners. These videos include the recipient's name and reference their specific year, make, and model of vehicle, which confirms for the recipient that this message was tailored and intended for them, reducing the likelihood that the recipient dismisses it as marketing or spam material. When this video is opened and viewed by the recipients, the likelihood of the recipient acting and scheduling a Recall Remedy appointment substantially increases, so the Settlement Special Administrator and Outreach Program vendors are looking for additional ways that this kind of personalization can be further leveraged.

Lastly, the Settlement Special Administrator and Outreach Program vendors are planning to undertake added "mystery shopping" efforts in which call agents will contact local dealerships to schedule a Recall Remedy appointment. This helps to find any issues that a typical individual may run into in trying to schedule a Takata recall appointment. This information can then be relayed back to the participating automobile manufacturers so that dealership performance can be continually improved, decreasing the friction for the vehicle owners in scheduling appointments, which is essential given the dealerships' ultimate role in the completion of the Recall Remedy cycle.

b. Overall Deployment and Response

A total of 189,614,513 outbound deployments across all available channels have been made by the Settlement Special Administrator and Outreach Program vendors to affected consumers. These deployments are broken out by primary channels below:

<u>Channel</u>	<u>Volume</u>	<u>Total Appointments</u>
Direct Mail Pieces	36,542,307	70,599
Emails	20,808,129	2,662
Outbound Calls	15,657,755	127,169
Digital/Facebook Impressions	116,465,269	6 ²
Tagging ³	134,339	6,080

c. Overall Results

The Settlement Special Administrator and Outreach Program vendors have performed outreach resulting in a total of 395,952⁴ appointments and “warm transfers” to allow consumers to schedule appointments directly with dealers, and 904,274 Recall Remedies have been completed since the transition of outreach to the Settlement Special Administrator and Outreach Program vendors.⁵

2. Additional Activities and Efforts

² Social media deployment on Facebook and other platforms is an extremely low-cost channel used primarily to keep consumer awareness and a social presence to support other outreach activities which more regularly result in appointments and repairs, such as direct mail and outbound phone calls.

³ “Tagging” refers to the process referenced in this and prior reports, whereby the Settlement Special Administrator’s Outreach Program vendors actively search for affected vehicles on the road and, when found, place recall notifications on those vehicles. As of January 1, 2025, these efforts were ceased as the specific sub-vendor used to implement tagging dropped this service. However, the Settlement Special Administrator and Outreach Program vendors continue to seek out other sub-vendors that may be able to provide the same or similar services in the future.

⁴ This figure exceeds the aggregate sum of the Total Appointments by Channel in the chart above because many of the inbound calls resulting from Outreach Program materials for Ford vehicles are currently routed directly to Ford’s call center for appointment scheduling purposes. Also see Footnote 6 below which is similarly applicable here.

⁵ Considering the significant efforts put forth towards indirect outreach methods such as mass media and public relations-type activities, Status Reports now provide the total number of Recall Remedies performed, irrespective of whether direct outreach had been performed on a vehicle. As previously mentioned, consumers often schedule repair appointments directly with the automobile manufacturer or their local dealership rather than by calling the Outreach Programs’ call center to do so. As such, the total Recall Remedy completion count presented here cannot be attributed solely to those direct activities conducted by the Settlement Special Administrator and Outreach Program vendors and exceeds the number of appointments and “warm transfers” set by Outreach Program vendors. This is also consistent with the fact that each automobile manufacturer continues significant and extensive outreach efforts beyond those activities performed by the Settlement Special Administrator in the Outreach Programs under the Settlement Agreements.

At the end of 2021, the Settlement Special Administrator dropped the use of earned media efforts as part of its Takata Outreach Program. Given the significant media coverage over the last several years, these earned media strategies aided in raising affected vehicle owners' awareness and understanding of the legitimacy and gravity of the Takata recalls. In ongoing consultation with the Parties and the National Highway Traffic Safety Administration, the Settlement Special Administrator and Outreach Program vendors continue to evaluate other activities to be performed in addition to and in conjunction with direct outreach to consumers.

3. Conclusion

The Settlement Special Administrator offers this Report to ensure that the Court is informed of the status of the Outreach Programs to date. If the Court finds more information helpful, the Settlement Special Administrator stands ready to provide it at the Court's convenience.

/s/ Patrick J. Hron
PATRICK J. HRON
Settlement Special Administrator