**BILLING CODE 4910-59-P**

**DEPARTMENT OF TRANSPORTATION**

**National Highway Traffic Safety Administration**

**[Docket No. NHTSA-2026-1553]**

**Denial of Motor Vehicle Defect Petition**

**AGENCY:** National Highway Traffic Safety Administration (NHTSA), Department of Transportation.

**ACTION:** Denial of a petition to open a defect investigation.

**SUMMARY:** This notice sets forth the reasons for the denial of a petition, DP25-002, submitted by Mr. Kevin Clouse to the Administrator of NHTSA (the "Agency") by a letter dated November 7, 2025, under 49 U.S.C. § 30162 and 49 CFR Part 552. The Petition requests that the Agency initiate a safety defect investigation into allegations that "the emergency egress controls for the mechanical door release are not readily accessible and clearly identifiable" and "as a result fail to comply with Federal Motor Vehicle Standard (FMVSS) 206 in the Model Year (MY) 2022 Tesla Model 3 (the "subject vehicles"). After conducting a technical review of 1) consumer complaints submitted by the petitioner; 2) consumer complaint information in NHTSA's databases; and 3) other relevant information in possession of the agency, NHTSA's Office of Defect Investigations (ODI) concluded that it is unlikely that additional investigation would result in finding that a defect related to motor vehicle safety exists, and the issue is best addressed through the rulemaking process. As a result, no further investigation of the issue raised by the Petition is warranted, and the agency has accordingly denied the Petition.

**FOR FURTHER INFORMATION CONTACT:** Mrs. Ayesha Huertas Torres, Vehicle Defect Division A, Office of Defects Investigation, NHTSA, 1200 New Jersey Avenue, SE, Washington, DC 20590. Telephone: 771-201-1918. E-mail: ayesha.huertastorres@dot.gov

**SUPPLEMENTARY INFORMATION:**

## 1. INTRODUCTION

Any interested person may petition NHTSA to request that the agency initiate an investigation to determine whether a motor vehicle or item of replacement equipment complies with an applicable motor vehicle safety standard or contains a defect that relates to motor vehicle safety. 49 U.S.C. § 30162(a)(2); 49 CFR § 552.3. Upon receipt of a properly filed petition, the agency conducts a technical review of the petition, material submitted with the petition, and any additional information. 49 CFR § 552.6. The technical review may consist solely of a review of information already in the possession of the agency or it may include the collection of information from the motor vehicle manufacturer and/or other sources. *Id*. After conducting the technical review and considering appropriate factors, which may include, but are not limited to, the nature of the complaint, allocation of agency resources, agency priorities, the likelihood of uncovering sufficient evidence to establish the existence of a defect and the likelihood of success in any necessary enforcement litigation, the agency will grant or deny the petition. *See* 49 U.S.C. § 30162(a)(2); 49 CFR § 552.8.

## 2. DEFECT PETITION SUMMARY

In a letter dated November 7, 2025, Mr. Kevin Clouse (the Petitioner) requested that NHTSA "open a safety defect investigation into the emergency mechanical door release design" in the MY 2022 Tesla Model 3 vehicles as the design "fails to comply with FMVSS 206 requiring emergency egress controls to be readily accessible and clearly identifiable." Mr. Clouse supported his request with details regarding his own experience during an emergency event.

The Petitioner stated that following a head-on collision, the MY 2022 Tesla Model 3 suffered a total loss of electrical power and caught fire. Due to the loss of power,

the electric door handles became inoperative. The Petitioner stated he was unable to locate the mechanical door handle, forcing him to climb into the back seat and exit the vehicle through a rear passenger window. The Petitioner further stated that the mechanical emergency door release in his 2022 MY Tesla Model 3 is not accessible and clearly identifiable and thus fails to comply with FMVSS 206. NHTSA has based its decision on a review of the material cited by the Petitioner, pertinent information in NHTSA's databases, and other relevant information in possession of the agency.

## 3. OFFICE OF DEFECTS INVESTIGATION ANALYSIS

A vehicle equipped with electric door handles without an accessible mechanical door release creates a risk to safety when the electric door handle becomes inoperative due to loss of power and occupants are unable to locate the mechanical door release to exit the vehicle in case of an emergency. A concealed or hard to locate door release could prevent an operator or occupant from exiting the vehicle in the event of an emergency, such as a crash or fire. The potential risk for entrapment can result in a severe injury or death of the operator and other occupants of the vehicle.

As of March 13, 2026, out of the population of 179,031 subject vehicles, NHTSA has identified one (1) consumer complaint, in NHTSA's databases alleging that the mechanical door release is concealed and unlabeled, resulting in a risk of entrapment in the event of an emergency, as cited in the Petition. The complaint is for the same Vehicle Identification Number (VIN) as the subject vehicle of the Petition. The allegation describes a front impact collision, where the vehicle lost electrical power, and the electric door mechanism stopped working.

The 2022 MY Model 3 has a mechanical release for the front doors, located in front of the window switch on the door's interior and consists of a lever that can be pulled up to open the door. The subject vehicle does not have a mechanical release for the back doors.

The owner's manual for the 2022 MY Tesla Model 3 includes a section labeled "In Case of Emergency" that details how to open doors from the interior when the vehicle has no electrical power. The owner's manual refers to the mechanical release as a "manual door release." The owner's manual instructs the operator to "pull up the manual door release located in front of the window switches." The owner's manual includes an illustration showing the mechanical door release lever and its location on the door. The illustration depicts an image of the door with the window switch and lever, including a blue arrow pointing to the location of the lever to demonstrate the upward movement required to operate the lever. The lever shown in the illustration does not contain a label to identify it. Although they vary in design and location, mechanical releases for the front doors are available on all Tesla models. The location and operation of the mechanical release is described in the owner's manual for each Tesla model. Further, the owner's manual cautions the operator that the mechanical door release should only be used when the subject vehicle has no power or if otherwise necessary. If the subject vehicle has power, the button located at the top of the interior door handle should be used to open the doors.

The Petition stated the lack of an accessible mechanical door release is a violation of the requirements of Federal Motor Vehicle Safety Standard (FMVSS) 206 (49 CFR § 571.206). FMVSS 206 specifies performance requirements for vehicle door locks, latches, hinges, and attachment components to prevent passenger ejection during crashes. It applies to passenger cars, trucks, and buses with a GVWR of 4,536 kg (10,000 lbs.) or less, focusing on maintaining latch engagement under inertial loads and structural integrity. No requirements exist in the standard that address the Petitioner's concern regarding the labeling and location of a mechanical door release in passenger vehicles.

On November 4, 2025, NHTSA's Office of Rulemaking received a petition to initiate the issuance of a new Federal Motor Vehicle Safety Standard (FMVSS) to

mandate a robust and obvious door egress system in all motor vehicles. The request has been granted, and the Agency will accordingly commence a rulemaking proceeding. *See* 49 CFR § 552.9. A decision as to the issuance of a rule will be made on the basis of all available information developed in the course of the rulemaking proceeding, in accordance with statutory criteria. *Id*.

The Agency has thoroughly assessed the material submitted by the Petitioner, consumer complaint information in NHTSA's databases, and other relevant information already in possession of the Agency. NHTSA does not believe that the issues presented by the Petitioner indicate the likelihood of a safety related defect that would warrant a defect investigation, and the issue is best addressed through the rulemaking process. After full consideration of the available information and the commencement of the related rulemaking proceeding, the Petition is denied.

(Authority: 49 U.S.C. 30162(d) and 49 CFR Part 522; delegation of authority at 49 CFR 1.95(a).[1])

**Eileen Sullivan,**

*Associate Administrator for Enforcement.*

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[1] The authority to determine whether to approve or deny defect petitions under 49 U.S.C. § 30162(d) and 49 CFR Part 552 has been further delegated to the Associate Administrator for Enforcement.