

June 23, 2017

The Honorable Bill Nelson  
Ranking Member  
Committee on Commerce, Science, and Transportation  
United States Senate  
Washington, D.C. 20510-6125

Dear Senator Nelson:

Thank you for your letter of yesterday concerning my nomination to be General Counsel of the U.S. Department of Transportation (the "Department"). After reviewing my responses to the Committee's Questionnaire and my Ethics Agreement with the Department's Designated Agency Ethics Official, or "DAEO," you have asked me to make specific commitments regarding recusals from matters involving Takata Corporation, including its subsidiaries and successor entities (together, "Takata"), in the event I am confirmed as the Department's General Counsel.

I very much appreciate your interest in these questions, and I know from direct experience how much you personally care about addressing and resolving the safety issues relating to airbag inflator ruptures. As you know, I represented the U.S. subsidiary of Takata in connection with the airbag inflator rupture issues before the Department and elsewhere. Among other things, I participated directly in the discussions with the National Highway Traffic Safety Administration, or "NHTSA," that produced the consent orders governing the recalls of Takata airbag inflators and establishing the framework for expansion of those recalls going forward.

With regard to Takata, as in all matters, you can be assured I take my ethical responsibilities extremely seriously, both as an attorney representing clients in private practice and as a prospective officer of the Government whose only client will be the United States. I will honor my professional duties as a lawyer and will adhere scrupulously to the requirements of the federal ethics laws and regulations, as well as the additional obligations I will assume under Executive Order 13770 ("Ethics Commitments by Executive Branch Appointees"), if confirmed.

Specifically: For the duration of my tenure with the Department, I will recuse myself from all aspects of the Takata airbag inflator recalls. Furthermore, under Executive Order 13770, for a period of two years following my confirmation as General Counsel of the Department, I will not participate in any other particular matter involving specific parties that is directly and substantially related to Takata, including regulations and contracts. I do not plan to seek a waiver under applicable ethics regulations to participate in particular matters involving Takata.

Respectfully submitted,



Steven G. Bradbury

cc: The Honorable John Thune, Chairman