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January 16, 2014

INFORMATION Redacted PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C . 552(B)(6)

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Fairbanks, AK [REDACTED]

NHTSA Headquarters
1200 New Jersey Avenue SE
West Building
Washington, DC 20590

JAN 24 2014

To Whom It May Concern:

This letter is a formal request to the Vehicle Safety Division, Office of Defects Investigation, requesting to re-open the closed case on the occupant position detection systems (OPDS) failures on certain Honda vehicle models and years. The NHTSA Action Number is PE05043 and the NHTSA investigation focused on the Honda Accord.

This case was closed by NHTSA without a finding because of Honda's actions to redesign the components and extend the warranty to 10 years or 150,00 miles on the Accord and other selected models including the CR-V for particular years and VIN numbers that experience the SRS (supplemental seat restraint) problem codes DTC 15-1, 15-2 and 15-3. My 2004 Honda CR-V was not included in the VIN numbers eligible for the extended warranty.

The reason for requesting this case re-opening is I do not think the full extent of the SRS problem was acknowledged or investigated by Honda. Honda only identified the problem as a component failure and did not acknowledge or investigate an electrical wiring issue that also can generate the SRS (supplemental restraint system) problem codes DTC 15-1, 15-2 and 15-3. I will detail my reasons below for this conclusion.

For the record I have submitted 2 vehicle safety complaints in 2013, ODI number 10523929 and 10555723 regarding the air bag sensor problems on my Honda 2004 CR-V. The SRS (supplemental seat restraint) light came on again in December 2013. The problem code in all of these repair visits has been SRS DTC 15-2 (faulty side airbag indicator circuit). To summarize, in 2013 the OPDS unit, OPDS sensor and SRS control unit were replaced by the dealer during separate visits as a remedy to stop the SRS light from coming on and shutting off the front passenger side air bag. Now the Honda tech thinks the problem is a wiring issue. Having read the Honda CR-V owner complaints on air bags, electrical system, and exterior lighting problems on safecar.gov, hondaproblems.com and hondasuv.com, I concur. A common complaint thread seems to be electrical wiring issues affecting other components. My own experience

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besides the repairs listed above has been headlight bulbs burning out prematurely. The last couple years I have burned out 2 headlight bulbs per year and before that 1 bulb per year.

I have read the Honda Accord case file on this OPDS problem including the memos and letters from the Office of Defects Investigation. The original NHTSA investigation in my judgment was very deficient in scope and impartiality.

The investigator seems to have made unwarranted assumptions about what the nature of the SRS problem was and narrowed the information requested unnecessarily in the NHTSA original letter to Honda dated 8/19/2005, page 2, bullet - Alleged defect: "Illumination of the SRS readiness indicator from either electrical interference to the OPDS sensor/unit, electronic devices operating near the 12-V DC outlet or a resulting DTC code of 15-3 during repair service." This above information was taken from the Honda Technical Service Bulletin as referenced clearly in the ODI Resume summary dated 8/12/2005.

Another mystery is why the investigator would only ask for customer information from Honda on work with the diagnostic code DTC 15-3. The ODI Resume by NHTSA dated 8/12/2005 that opens the investigation states that "ODI has received VOQ owner complaints that allege the illumination of the supplemental restraint system (SRS) readiness indicator lamp in their vehicles (equipped with side airbags). Many of the consumers reported a DTC code of 15-3 was retrieved from the SRS module at the service center." The above statement does not say all of the SRS complaints were 15-3. When I looked at the CR-V complaints on safecar.gov under airbag issues for the model years of the extended warranty, very few of the vehicle owners specified the SRS diagnostic code being read by the mechanic. The Honda Service Bulletin which is part of the case file clearly mentions 2 other DTC codes, 15-1 and 15-2 that apply to the OPDS failures. In fact the diagnostic problem code DTC 15-2 is defined as "the faulty side airbag indicator circuit". Yet the investigator never requested any complaint information from Honda regarding this problem code. Honda, of course complied with the NHTSA request and only provided complaint information pertaining to DTC 15-3 code. Would a broader scope have identified other causes for the SRS light to come on.

Would the voluntary action by Honda to extend the warranty to cover 3 DTC problem codes, 15-1, 15-2 and 15-3 rather than 15-3 alone for the OPDS problems have not raised some suspicion with NHTSA investigators that maybe the problem was more complex than the company was saying.

In a review of the case file, I saw no explanation, documentation or rationale by NHTSA for the selected models, years and VIN numbers to be included in the Honda extended warranty. I would have expected to find such information in a well documented case file.


Finally, the case file contains company proprietary documents that were withheld from the public file at Honda's request. I saw no attempt by NHTSA investigators to summarize those documents to give the public reader a sense of what information was being held and why. Again, a demonstration of the lack of interest in looking out for the consumer in this case.

What I see here is a very successful attempt by Honda with the silent complicity of NHTSA to avoid a larger re-call action, the electrical wiring harness failures on Honda models by focusing on the OPDS component failures alone. From the company perspective, the longer Honda delays, the fewer vehicles on the road that a re-call will affect.

I should think that 30 days would be sufficient for NHTSA to make a decision on my request. If I do not hear from NHTSA after 30 days, then I will continue with the next step in my action plan.

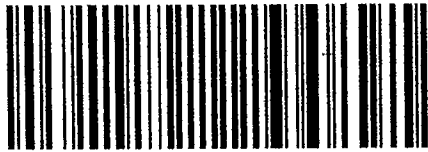
Thank you for your consideration.

Sincerely,

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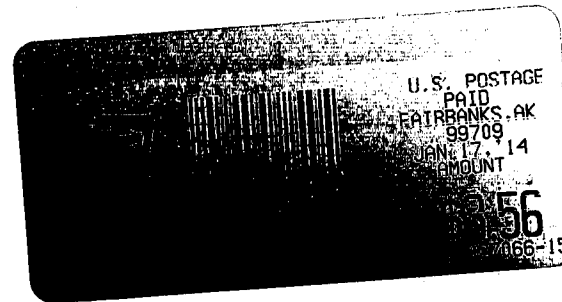
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