

[REDACTED]
 Plaistow, NH [REDACTED]

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 OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

February 23, 2022

Mark Zuckerman, Chief, Criminal Division
 Office of the United States Attorney
 55 Pleasant Street #352
 Concord, NH 03301

Certified Mail # [REDACTED]

✓ Anne Collins Associate Director, Enforcement
 National Highway Traffic Safety Administration
 1200 New Jersey Avenue SE
 Washington, DC 20590

Certified Mail [REDACTED]

Duane Boniface, Assistant Executive Director
 Consumer Product Safety Commission
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 4330 East-West Highway
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Certified Mail [REDACTED]

Brandon Garod, Chief
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 State of New Hampshire
 Office of the Attorney General
 33 Capitol Street
 Concord, NH 03301

Certified Mail [REDACTED]

Captain Christopher Vetter, Commander
 New Hampshire Department of Safety
 Office of Highway Safety
 33 Hazen Drive, Room 208
 Concord, NH 03305

Certified Mail [REDACTED]

Re: 2016 Hyundai Santa Fe Vehicles
 National Recall - Chronic Unresolved National Safety Issue
 Violation of Magnusson-Moss Warranty Act

To Whom It May Concern:

This is written to request an immediate federal investigation and order for a motor vehicle recall with regard to a national public safety issue involving a known defect in Hyundai Santa Fe SUVs. The writers of this letter are a married couple. [REDACTED] was the purchaser and is the current owner of the vehicle, and [REDACTED] is an experienced former automotive mechanic and computerized electromechanical repair engineer. This concern has not been addressed at any level despite complaints to the National Highway Traffic Safety Administration by multiple other Santa Fe owners (documentation herein), together with our efforts at resolution for the past three years with both the automotive dealership and the national manufacturer. The vehicle that is the subject of this letter is under warranty, and the manufacturer is also in violation of the federal Magnusson-Moss Warranty Act (Public Law 93-637), known as the "federal lemon law." The interstate nexus requirement for a federal investigation is met in this instance by the fact that the vehicle was assembled in Alabama and traveled across state lines to be sold in New Hampshire.

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The National Highway Traffic Safety Administration is aware of Hyundai's history of inaccurately reporting crucial information about the nature of serious defects in Hyundai's vehicles¹. This is further illustrated by the many recalls on Hyundai vehicles, including the most recent recall of nearly a half million vehicles due to faulty parts which may catch fire.

In 2015, [REDACTED] purchased a 2016 Santa Fe GLS from Hampton (New Hampshire) Ford-Hyundai. The vehicle performed without incident until July of 2018. What follows is a chronological description of events that have occurred since that time.

July 7, 2018: We first experienced a malfunction consisting of no response from the throttle while driving on the road (gas pedal all the way to the floor, vehicle did not accelerate). We pulled over to the side of the road; upon stopping, the vehicle began knocking and tried to stall. We were able to reset it by turning the ignition off, removing the key from the ignition, waiting one minute, and then restarting. However, the problem kept recurring so we took the vehicle to Hampton Ford-Hyundai for service the same day. The technician (Mark) found rodent debris in the air filter housing, attributed the problem to that, replaced the air filter and cleaned out the filter box. We paid \$34.68 and took the vehicle home.

July 9, 2018: The same problem occurred again. We took it to AutoZone for a computer readout. The AutoZone computer showed this code: "P0611 Fuel Injector Control Module Performance." We made an appointment to bring the Santa Fe back to Hampton Ford-Hyundai.

July 10, 2018: We took the vehicle back to Hampton Ford-Hyundai for service. We waited for three hours while the vehicle was worked on. The repair slip indicated that the injector driver box (board) was replaced.

July 18, 2018: The same problem recurred. We took the vehicle to AutoZone for a computer readout. The AutoZone computer showed these two codes: "P0611 Fuel Injector Control Module Performance" and "P0091 Fuel Pressure Regulator Control Circuit Low." We made an appointment to take the vehicle to Hampton Ford-Hyundai.

July 20, 2018: We took the vehicle back to Hampton Ford-Hyundai for service. We were given a loaner car, and the vehicle was at Hampton Ford Hyundai for ten days. When we picked up the vehicle, the repair slip indicated that the fuel pump assembly was replaced.

August 3, 2018: The Santa Fe's check engine light came on when the vehicle was started after sitting in a parking lot for one hour. The vehicle idled rough but performed normally on the highway. The check engine light went out after one day.

August 11, 2018: Again we experienced the initial problem with no response from the throttle, then the Santa Fe stalled in an intersection in the middle of traffic and initially would not start again. We had two additional passengers in the car this time. We were able to "limp" into a parking lot, did a reset with powering down, and eventually got the vehicle home.

August 13, 2018: We called Hampton Ford-Hyundai and made an appointment to bring the Santa Fe in for service the following day. We were informed that there would not be any loaner cars

¹ "NHTSA Makes Its First Ever Whistleblower Award," *United States Department of Transportation*, NHTSA, Washington, DC, Internet, 2021, [REDACTED]

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available for two to three weeks. We also took the vehicle to AutoZone for a computer readout. The AutoZone computer showed these two codes: "P0611 Fuel Injector Control Module Performance" and "P0462 Fuel Level Sensor A Circuit Low Input."

August 14, 2018: We took the Santa Fe to Hampton Ford-Hyundai for the scheduled service appointment. Service writer Susan Vandecasteele told us that we would have to leave the vehicle in order for them to find the problem, and that the technician (Mark) would be consulting with Hyundai. We told Ms. Vandecasteele that we need to have a loaner; she responded that she would call us when a loaner comes back and at that time we would have to bring the Santa Fe in immediately. We requested a copy of the repair order for today's service appointment, and Ms. Vandecasteele told us that Mark had the repair order. We asked if she could get it, and she replied "No, he has it." We were unable to obtain any documentation at this time for the service appointment, and waited for Ms. Vandecasteele to call. The vehicle was taken home and placed out of service due to being unsafe to drive.

August 28, 2018: Two weeks after the last service visit, we called Hampton Ford-Hyundai to inquire about the status of a loaner car so that our Santa Fe could be worked on. Susan Vandecasteele informed us that all of Hampton Ford-Hyundai's loaner cars were now out on "long-term rentals" and would not be back for a minimum of one month. We told Ms. Vandecasteele that the vehicle had been sitting in our driveway for two weeks because it was not safe to take on the road.

September 4, 2018: We brought our Santa Fe to Hampton Ford-Hyundai for the next scheduled service appointment. With no loaners available, one of us drove the 2016 Santa Fe while the other followed in the 2011 Santa Fe. We were finally able to obtain a copy of the repair slip from the August 14th service appointment. We were told to await a call from Service.

September 12, 2018: We had received no word from Hampton Ford-Hyundai since dropping off our Santa Fe eight days prior. We called the Service Department and spoke with Craig, who told us that the technician (Mark) would be looking at the vehicle today and that Mark put in a request to Hyundai's TechLine yesterday and was waiting to hear back, which might take up to 48 hours. Since no progress was being made and it had already taken eight days for Service to start looking at the vehicle, we went to Hampton Ford-Hyundai to pick it up. Ms. Vandecasteele was there, and she proceeded to list several possible causes for the ongoing issues but that they had not diagnosed the problem and that they were waiting to hear from Hyundai. We took the vehicle home again to await a call from Hampton Ford-Hyundai.

September 13, 2018: We attempted to use the vehicle for an appointment in Lawrence, Massachusetts (15 minutes from home). The same problem with no throttle response was replicated within five minutes after leaving the driveway of our home. We pulled over, the vehicle displayed a "check engine" light, and stalled. We turned off the ignition, removed the key, waited a few seconds, and restarted the engine. The vehicle performed normally, except the "check engine" light stayed on until the end of this trip.

September 24, 2018: We filed a claim with Hyundai customer assistance. Claim number [REDACTED]

September 26, 2018: After two months of Hampton Ford-Hyundai's inability to diagnose or repair the Santa Fe, we spoke with Mary from Hyundai Motor America. Mary advised that they have no record of Hampton Ford-Hyundai ever placing a call to TechLine. At this point, we had decided not to bring the Santa Fe back to Hampton Ford-Hyundai. Following a full explanation of events that have taken place with this vehicle up until now, Mary agreed with our decision to take the

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vehicle to a different dealership to diagnose the safety issue. We would be calling Salem Hyundai, and Mary said that she would follow up by calling Salem Hyundai to make sure that they call TechLine and that the problem is addressed.

September 27, 2018: We made an appointment to bring the Santa Fe to Salem Hyundai on October 4, 2018. Service writer Mike said their technician would drive the vehicle to see if they could replicate the problem, and this would determine whether or not we would be eligible for a loaner car. We called case manager Mary at Hyundai Motor America to bring her up to date. Mary also advised us that Hyundai Motor America would definitely reimburse us for a rental car as a “goodwill gesture” if we wanted to get a rental.

October 4, 2018: We dropped off our Santa Fe at Salem Hyundai. The service manager, Gary Peters, said he would take the vehicle home to see if he could replicate the problem.

October 8, 2018: We heard back from service manager Gary Peters at Salem Hyundai. We learned that their master technician, Mike, had identified the problem: a burned-out pin on the powertrain control module (PCM). The service manager also informed us that we have a bad battery. He ordered a new PCM and replaced the battery.

October 9, 2018: We picked up the Santa Fe from Salem Hyundai. The new PCM and battery had been installed. Service manager Gary Peters told us that there were some things that they were surprised Hampton Ford-Hyundai did not check. He showed us the burned-out pin on the old PCM, and told us that there were also issues with the main wiring harness data port connector, but that was not being replaced at this time because Hyundai did not consider the wiring harness to be covered under the warranty, for reasons unknown to the dealership. The vehicle then operated properly for almost three years.

June 15, 2021: (Date approximate) We received a recall notice from Hyundai to bring the Santa Fe in to a dealership for a campaign to replace a canister. We initially called Salem Hyundai; however, no one picked up the phone in Service and the voicemail box was full. We elected to make the recall appointment at Hampton Ford-Hyundai. We called Hampton Ford-Hyundai and spoke with service writer Dan Bergeron to schedule the recall appointment. We would be out of state for the entire summer, so we made the appointment for September 17, 2021.

September 17, 2021: On this date, the same day we brought the Santa Fe to Hampton Ford-Hyundai for the canister campaign, we experienced a recurrence of exactly the same safety issues that happened three years prior. The vehicle had not been in service for over two months while we were away. Approximately four miles after we left the dealership, following completion of the recall service appointment, the vehicle began to “pop” and hesitate as we drove on Route 1, and was obviously not running properly. When we stopped in traffic, the vehicle stalled and would not re-start. We called the Service Department at Hampton Ford-Hyundai and spoke with Dan Bergeron, and told him that the vehicle was dead in the middle of the road. Mr. Bergeron said that they did not have a tow truck and that we should call AAA to bring the vehicle back to the dealership. While we were placing the call to AAA, another motorist was able to push us off the road and onto a side street. After waiting for AAA for a while, we tried what had worked before: removed the key from the ignition, waited a minute, and then we were able to re-start the Santa Fe. We decided to try driving back to the dealership, since we had been told by AAA that there would be an hour wait. We were able to make it back to Hampton Ford-Hyundai, and we waited while the vehicle was in the Service Department. Service manager Jason Marshall and service writer Dan Deveau told us that the technician had checked the PCM data port connector at our request, found it to be fine, and that they could not replicate the problem and could find nothing wrong with the vehicle. We took

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the vehicle home. Before we made it to our house, the Santa Fe was popping and malfunctioning again.

September 19, 2021: We attempted to use the Santa Fe for several errands. The vehicle was bucking noticeably, and after about an hour of driving the gas pedal once again did not respond when depressed. We were able to maintain speed and get home. Once we got home, we took photographs of the PCM and the data port connector which connects the PCM to the wiring harness. ***Burnt, misshapen holes can be clearly observed on the data port connector as well as obvious damaged marks on the PCM.*** Those photographs are included with this letter, marked as Exhibit A and Exhibit B.

September 20, 2021: We met with service manager Jason Marshall and fixed operations director David Delude in Mr. Marshall's office at Hampton Ford Hyundai, at our request. We provided the photographs of the defects on the PCM and data port connector. Mr. Marshall told us that he was in possession of the records of repairs we had done at Salem Hyundai. Mr. Delude expressed that the solution to the problem with our Santa Fe would depend on what Hampton Ford Hyundai finds, and that if the wiring was involved, ***"Hyundai is weird like that" and we may have a problem getting the vehicle repaired under the warranty.*** Mr. Delude told us that if this takes place he would involve the District Parts and Service Manager (DPSM), and also said that if the problem is the PCM then the repair would definitely fall under the 10/100 warranty. Mr. Delude said that they would check the engine control module when we bring the vehicle in, to determine "which pin goes to what." Mr. Marshall requested that we email him when the Santa Fe was dropped off at Hampton Ford-Hyundai.

September 21, 2021: We brought the Santa Fe to Hampton Ford-Hyundai, with one of us driving the 2016 Santa Fe and the other following in our other vehicle. We emailed the service manager, Jason Marshall, as he had requested, to let him know that our vehicle had been left at the dealership. Mr. Marshall replied by email, asking if they had permission to drive the vehicle overnight. We replied that they had permission.

September 23, 2021: We received an email from Jason Marshall saying that they had not "been able to duplicate anything with the vehicle." He wrote that he would submit our photos and our "concern" to Hyundai to get direction. We provided Mr. Marshall with the case number from our open case with Hyundai. Later in the day, Mr. Marshall emailed as follows: ***"The total repair to replace that harness is \$3000. Hyundai is offering 50% coverage at this time."*** This solution did not fulfill Hyundai's obligations under the warranty, and we had documented that the problem was the data port connector to the wiring harness, not the entire wiring harness. We proceeded to Hampton Ford-Hyundai to pick up our vehicle. Mr. Marshall provided us with a written copy of the communication between Hyundai and Hampton Ford-Hyundai. The vehicle was then placed out of service in our driveway.

September 24, 2021: We emailed service manager Jason Marshall to inquire if it is possible to replace only the data port connector and not the entire wiring harness. Mr. Marshall responded that he was "being told" that ***"on that harness the connector is not available separately."***²

² Apparently, because Hyundai had chosen not to engineer a means of inserting a replacement data port connector, it was Hyundai's decision not to cover the most important component of all – the wiring harness. The main PCM (powertrain control module) is networked together on data links contained within the wiring harness to over 40 computers which operate all the electronics needed to run the vehicle.

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September 25, 2021: We sent an email to service manager Jason Marshall to inquire if the District Parts and Service Manager (DPSM) had been informed about the safety issue with our Santa Fe, as Mr. Delude had stated during our meeting on September 20, 2021. Mr. Marshall responded by email that the DPSM was not involved because, "Had corporate not offered any monies toward the repair, we would have involved him." We responded by requesting that Mr. Marshall bring the DPSM up to speed "with a request from the customer" that the DPSM pursue full warranty coverage from Hyundai. Mr. Marshall did not address this request. Instead, he changed the subject in his reply email: "Have you contacted Hyundai customer assistance? If so, what did they say? The DPSM cannot override corporate unfortunately. Also, has the vehicle exhibited the same issue since you took it last week from here?" Nothing in Mr. Marshall's email addressed our request. We never asked him to have the DPSM override corporate. We had not used the vehicle since we took it from Hampton Ford-Hyundai (and we did inform Mr. Marshall of this).³

October 4, 2021: We mailed a certified letter to Jay McFarland, the owner and president of Hampton Ford-Hyundai, outlining the same concerns described in this letter. To date we have received no response.

October 13, 2021: We filed a claim with Hyundai Motor America National Consumer Affairs (Case [REDACTED]) and received an email response from a representative named "Javante." We forwarded all the information to Javante, to bring Hyundai up to speed on the situation.

October 14, 2021: Javante from Hyundai informed us by email that, **because we had declined 50 percent coverage, Hyundai had now reversed its offer and would provide no assistance in repairing the safety issue.** We requested clarification of Hyundai's refusal to extend full warranty coverage for the vehicle. **The Hyundai representative then advised us to take this question to the dealership (Hampton Ford-Hyundai) "as they were the ones directly dealing with the warranty company,"** or to take the vehicle to another dealership, but reiterated that Hyundai would offer nothing toward the warranty repair. Since we had now obviously been placed in a circular holding pattern with no resolution forthcoming, we inquired as to the next level at Hyundai to escalate this issue.

October 27, 2021: After thirteen days and additional requests for a response, Javante at Hyundai Motor America informed us by email that since Hyundai has denied the warranty repair, there is no further "team" to which the case could be escalated. She repeated again that **when the warranty department offered to pay 50% of the repair and that offer was denied, Hyundai elected not to move forward with assisting with the repairs.**

The safety defect remains outstanding and unresolved. As outlined above, the vehicle has been taken to two authorized Hyundai dealerships well in excess of the three attempts required by the federal lemon law.

At this point, we have a vehicle with a mechanical defect that is a threat to public safety. Given the severity of the malfunction, which has also occurred on other vehicles of this model and about which the National Highway Traffic Safety Administration has received multiple complaints, a national recall is warranted and overdue and should be ordered immediately.

³ We were confounded as to the purpose of Mr. Marshall asking if the problem had recurred, especially after having been supplied with direct photographic evidence of the fatal defect and having it verified by his own service department on September 21, 2021.

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Research reveals that Hyundai Motor America and the National Highway Traffic Safety Administration have been aware of consumer reports of the Santa Fe stalling unexpectedly on the road and experiencing a lack of throttle response in Santa Fe models dating back to 2010, yet there has been no national campaign to recall the vehicle for this critical safety hazard. A small sample of complaints filed with the National Highway Traffic Safety Administration about the 2016 Santa Fe illustrates the incidents of stalling and lack of throttle response:

Wife stopped at stop sign, car would not respond to accelerator pedal, one block from home was able to idle car into driveway. I got into car to see what was going on, found same problem. I shut car off and restarted and accelerator started working. Pulled into garage and called Hyundai to get towed to dealer. Car not safe to drive.

While driving on the interstate, I pressed the gas pedal and the vehicle would not accelerate. The motor was running and the vehicle seemed to have some pull on its own but clearly anytime the gas pedal was pressed there was no acceleration. It was diagnosed as a default in the throttle body.

While driving about 65 mph on the highway all of a sudden the warning lights (engine, oil, etc.) came on at the same time and the car just shut down and lost power steering. Luckily I was able to pull over without any problems. The vehicle wouldn't start. It just made a click when turning the key. All of the lights work in the vehicle. The vehicle has about 82,000 miles.

Vehicle stalled and locked up was not able to push brakes or turn steering dealer advised me engine was stalled and needed to be replaced, was known in my model, this was why this vehicle and year had an extended warranty unto 200K miles. The engine was replaced and the vehicle is still not running correctly. When accelerating to turn on highway, it seems stalled and doesn't move, returning to dealer tomorrow after being w/o a vehicle 3 weeks. It is not coming up on your recall notices and am concerned this is a safety issue.

First occurrence, the check engine light started flashing, engine went into "safe mode" and acceleration decreased dramatically. Dealership pushed an "update" to the computer and "fixed" it. Issue has happened again and now dealership is saying that the engine knock sensor is messed up.

The vehicle was being driven on an interstate when the engine started knocking and then quit. Car had to be towed and left at a dealer to have the engine replaced. The driver then had to rent a vehicle to complete his trip out of state.

On September 15, 2021 while driving the Santa Fe engine just stopped in the middle of an intersection, was able to coast to the side of the road. Vehicle has fuel, showed no issues prior. Tow truck driver attempted to jumpstart the vehicle with no avail, was towed to the local Hyundai dealership who had it for one week to finally tell me that the motor was blown and needs a new long motor for \$15,399.00 USD. Had a second automotive shop check out the vehicle and was told the same diagnosis, motor was blown needs to be replaced, and that Hyundai no longer is manufacturing the long engine the this Santa Fe takes. I was also informed that this wasn't the first Santa Fe that they have diagnosed with this problem, both the Sport model and the same model I currently have. Neither the Hyundai dealership or the dealership where I purchased this vehicle one year ago, will help me...

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The qualifications of [REDACTED] co-writer of this letter, include but are not limited to the following:

(1) [REDACTED] is an experienced former State of New Hampshire certified inspection mechanic with experience in performing state-sanctioned automotive inspections; (2) he has received certifications in automotive factory training from BMW America and Snap-On Tool Corporation; (3) he has been a successful authorized Snap-On Tool distributor, technically trained in sales, service, and installation of state-of-the-art electronic diagnostics oscilloscopes, infrared exhaust gas analysis, carbon-pile electrical-load test equipment and various mechanical and electronic hand tools; and (4) as an authorized Snap-On Tool distributor, he was contractually responsible for the technical training of certified automotive service technicians (mechanics) in the proper use and diagnostics of the aforementioned equipment as it related directly to the automobiles they repaired. [REDACTED] comes from a family of automotive technicians and began working in garages at a young age.

Following his automotive career, [REDACTED] embarked on a profession in computerized electromechanical industrial equipment as a repair engineer, in which he received numerous factory training certifications in (but not limited to) point-to-point electronic board diagnostics, optical laser technology, artificial intelligence, power supply diagnostics repair, and **inter-logic lockout problems and diagnostics**⁴ from Toshiba, Cannon, Sharp, Ricoh and Kyocera – top world leaders in electronics engineering and manufacturing.

Based on the training, knowledge and experienced gained from [REDACTED] automotive and electronics career, the writers assert that no electronics engineering manufacturer would condone Hyundai's corporate decision to allow known fatal defects in the equipment they manufacture, sell and service. This is separate and apart from the breach of warranty issue.

Hyundai Motor America and its contractually-authorized dealerships are clearly in breach of the vehicle's warranty by their failure to fully cover the wiring harness data port connector for the powertrain control module (main drive computer) to effect this critical repair, and are in violation of the Magnusson-Moss Warranty Act by their refusal to honor the motor vehicle's warranty and/or to repair the vehicle, replace the vehicle, or provide a refund as required by statute.

Hampton Ford-Hyundai was unable to diagnose the problem that the Salem Hyundai dealership diagnosed, due to Hyundai Motor America's refusal to replace and re-splice a replacement data port connector. Hampton Ford-Hyundai failed to address, understand, technically diagnose and correct the safety problem, and has left the owner to their own devices.

The writers allege that no American automotive manufacturer would tolerate Hyundai's actions in allowing these automobiles on the road without being repaired. Hyundai is ultimately a foreign corporation, located and headquartered in South Korea, acting in concert with its legally-contracted United States automobile

⁴ Inter-logic lock-out problems arise specifically in computerized electronic equipment. A "lock-out" is a condition that arises when one circuit logic board (a computer component) is unable to communicate with another integrated circuit logic board. These conditions are fatal to the operation of the equipment, generally requiring a reset or reboot of the unit or, in severe cases, a "flash" (reload) or update of the operating instructions (firmware). In the instant case, the most predictable causes for a lock-out condition are faulty physical connections in the wiring harness data port or the **wiring harness data port connector to the powertrain control module (PCM)**.

Office of the United States Attorney
National Highway Traffic Safety Administration
Consumer Product Safety Commission
New Hampshire Attorney General
New Hampshire Department of Safety

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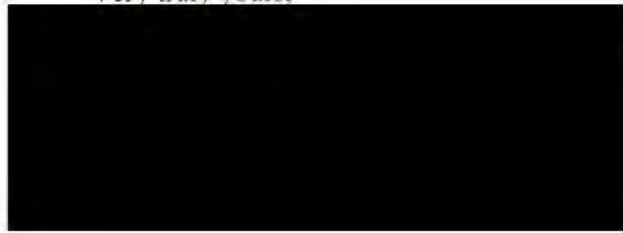
dealerships. Together, they have failed to use reasonable care to avoid potential consequences that threaten the safety of the public, where the outcome is demonstrably foreseeable.

We have presented the federal and state regulatory agencies addressed in this letter with substantive and sufficient evidence to commence the investigation process to issue a recall order on the Hyundai Santa Fe for the safety defects described herein, under the authority provided by the National Traffic and Motor Vehicle Safety Act (49 USC Chapter 301). At a minimum, all motor vehicle crashes involving Hyundai vehicles in the United States should result in an inspection of the PCM data port connector.

We also request that the appropriate entities receiving this letter address and respond to the allegations and evidence we have provided, pertaining to Hyundai Motor America's violation of the Magnusson-Moss Warranty Act by Hyundai's refusal to honor the manufacturer warranty or provide the vehicle owner with any of the remedies outlined in the Act.

Thank you for your timely attention to this matter.

Very truly yours,



Enclosures

STATE OF NEW HAMPSHIRE
ROCKINGHAM, SS

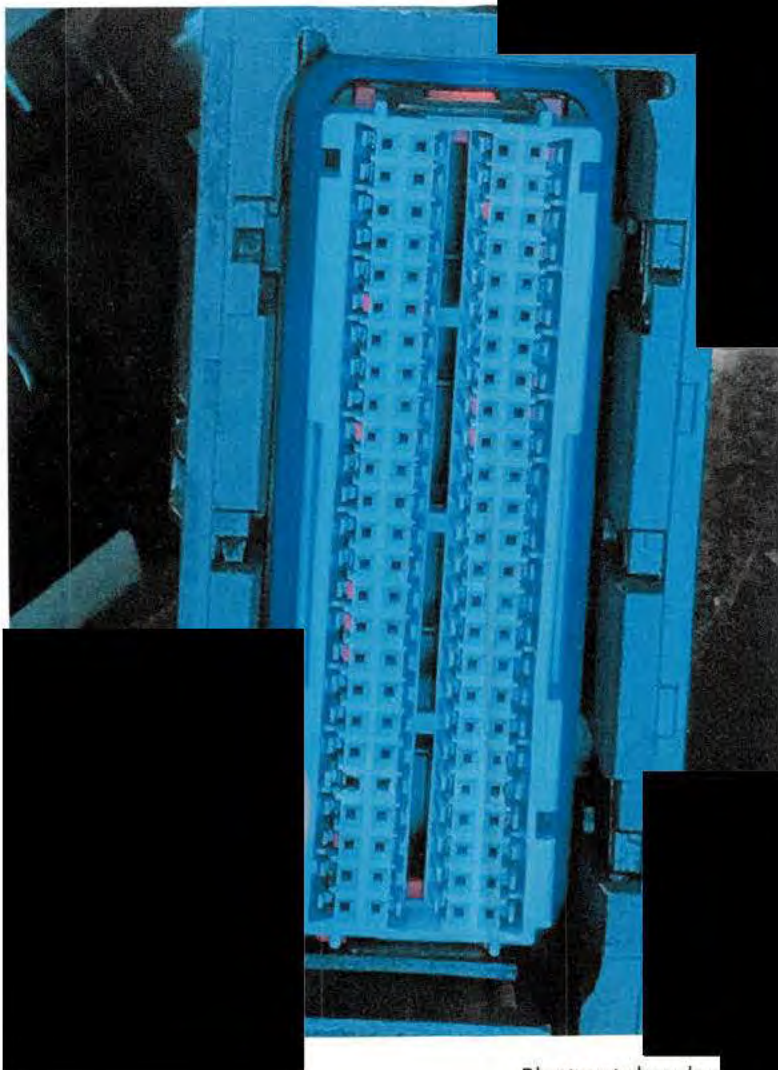
Personally appeared before me the above-named [REDACTED] and [REDACTED]
and took oath that the foregoing document is true to the best of their knowledge, information and belief.

This 23rd day of February, 2022.

(Seal)

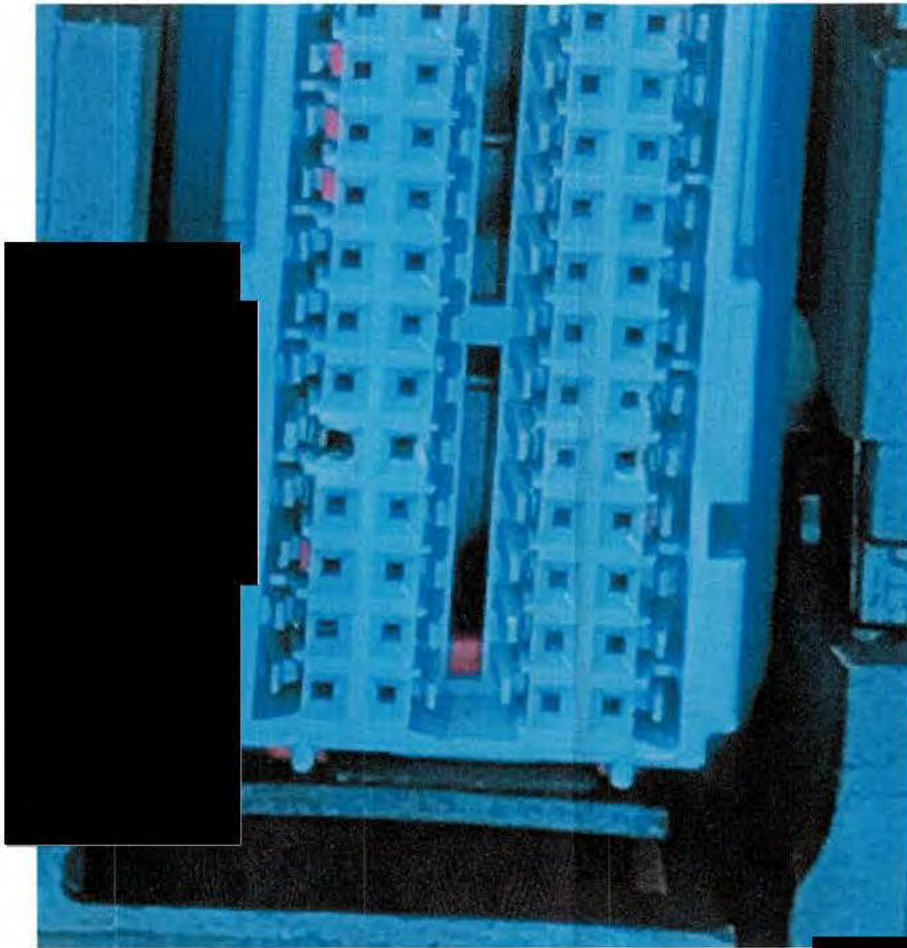



Notary Public
My commission expires: June 30, 2026



Photos taken by [REDACTED]
09/19/21 at [REDACTED] Plainfield, NJ

EXHIBIT A



Photos taken by [REDACTED]
09/19/21 [REDACTED] Plaistow, NH

EXHIBIT B

CERTIFIED MAIL



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W44-226

Anne Collins Associate Director
National Highway Traffic Safety
1200 New Jersey Avenue SE
Washington, DC 20590



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