

# HYUNDAI AMERICA TECHNICAL CENTER, INC.

A Subsidiary of  
Hyundai Motor Company (Korea)

81 Bunsen  
Irvine, CA 92618

Tel: (949) 585-7105  
Fax: (949) 585-7100

January 13, 2004

Mr. Thomas Z. Cooper  
Vehicle Integrity Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

RECEIVED  
NVS-210  
JAN 14 P 12:29  
OFFICE OF DEFECTS  
INVESTIGATION

Re: 2001 Kia Rio Engine Compartment Fire Investigation  
NVS-212kmb  
EA03-015

Dear Mr. Cooper:

This letter provides preliminary information developed by Kia Motors America, Inc. and Kia Motors Corp. ("Kia") in response to your letter notifying Kia that the Office of Defects Investigation ("ODI") has opened an Recall Query (RQ03-015) to investigate the adequacy of the scope of a prior safety recall of 2001 Kia Rio vehicles due to a allegations of engine compartment fire due to an alleged fuel system leak. NHTSA's identifier for the previous recall is Campaign No. 03V-352. Specifically, this letter responds to Questions 1 through 9 set forth in your letter. Kia is continuing to assemble information in response to your investigation and will submit further information as it becomes available.

1. State, by model and model year, the number of subject vehicles Kia has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Kia, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;

- f. Date warranty coverage commenced; and
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, EA03-015 Data Collection Disc, for a pre-formatted table which provides further details regarding this submission. Kia's response must adhere precisely to the format defined in the enclosure.

Production information for the sales volume of the Kia Rio and Kia Rio Cinco through December 31, 2003 is provided in Appendix 1.

2. State the number of each of the following, received by Kia, or of which Kia is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Reports involving a fire, based on claims against the manufacturer involving a fire, notices received by the manufacturer alleging or proving that a fire was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- e. Property damage claims;
- f. Third-party arbitration proceedings where Kia is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Kia is or was a defendant or codefendant.

For subparts "a" through "e" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a filed report and a consumer complaint).

In addition, for items "c" through "g," provide a summary description of the alleged problem and causal and contributing factors and Kia's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "f" and "g," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Kia's table of known incidents through December 4, 2003 which relate to, or which may relate to, the described defect in subject vehicles is provided in Appendix 2.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Kia's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether a fire is alleged;
- k. If a fire is alleged, the quadrant of the engine compartment where the fire started; use the terms "front driver," "front passenger," "rear driver," or "rear passenger" to identify the fire's origination;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any;
- n. Number of alleged fatalities, if any;
- o. Relevance to the alleged defect of this investigation ("engine compartment fire due to an alleged fuel system leak") use the terms "likely," "possible," "unlikely," "unknown"; and
- p. Complaint summary description.

Provide information in Microsoft Access 2000, or a compatible format, entitled "COMPLAINT DATA." See Enclosure 1, EA03-015 Data Collection Disc, for a pre-formatted table which provides further details regarding this submission. Kia's response must adhere precisely to the format defined in the enclosure.

Kia's table of known incidents through December 4, 2003 which relate to, or which may relate to, the described defect in subject vehicles is provided in Appendix 2.

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaint, field reports, etc.) and describe the method Kia used for organizing the documents.

A hard copy of the Kia Consumer Affairs database information maintained for communications summarized above, excluding those previously provided to the Office of Defects Investigation, are separately provided as Appendix 3 to this response, organized by model year.

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Kia to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Kia's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, EA03-015 Data Collection Disc, for a pre-formatted table which provides further details regarding this submission. Kia's response must adhere precisely to the format defined in the enclosure.

Kia's table of warranty claims through December 31, 2003 that relate to, or which may relate to, the described defect in subject vehicles is provided in Appendix 4.

6. Describe in detail the search criteria used by Kia to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Kia on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Kia offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

The criteria included vehicle model, model year, and claims paid since start of production through December 31, 2003. The claim was required to contain a causal part number for the Fuel Distributor Assembly (OK30E 13 150), Main Fuel Tube Assembly (OK32A 13 49XB), or Main Fuel Pipe (OK32A 45 111A), and included all claims with or without a replacement quantity. The query included all dealers (port and retailers), nature codes, all cause codes and no mileage limitations. The search parameters also included all labor operations and all claim types.

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Kia has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Kia is planning to issue within the next 120 days.

Kia is enclosing two copies of the Kia Technician Times published in 2003: Volume 6, Issue 5 published in November and Volume 6, Issue 6 published in December. In the November publication Kia gave instructions on the proper method for connecting and disconnecting "quick connect" style couplings used to interconnect fuel lines in newly introduced Kia vehicles. In the December publication, Kia announced the availability of a new quick connect fuel line tool to aid in the removal of quick connect fuel lines used on Kia vehicles, particularly Rio fuel rails. The December publication also included a cautionary instruction to use care when working under the hood of a Rio vehicle not to exert pressure on the fuel line from the fuel rail to the bulkhead.

Also enclosed is a October 1, 2003 letter from Kia Motors America, Inc. to its dealership body discussing its investigation of engine compartment fires in 2001 Kia Rio vehicles.

8. Describe all assessments, analysis, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Kia. For each such action, provide the following information:

a. Action title or identifier;

- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

In September 2003 Kia notified the Office of Defects Investigation that it was initiating a recall of 2001 Kia Rio vehicles because of quality deviations in the service port valve or main fuel tube assembly. These deviations involved potentially defective plastic welds at the service port and/or fuel intake nipple to the fuel distributor assembly reported by Kia's vendor to affect certain 2001 Kia Rio's. As part of its effort to confirm a proper repair remedy concerns developed regarding the potential for fuel leakage in model years and/or models produced after the 2001 model run, an investigation was undertaken to determine whether the potential for fuel leakage existed in Rio vehicles not affected by the previously identified quality deviation. The current results of that investigation, as well as Kia's answers to the questions posed above, are described in Appendix 5.

9. For each subject component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Identify any changes made to the supplier of the subject components, the date at which the change occurred, and the reason given for the change.

Supplier information for the Fuel Distributor Assembly (0K30E 13 150), Main Fuel Tube Assembly (0K32A 13 49XB), and Main Fuel Pipe (0K32A 45 111A) installed in the 2001 through 2004 Kia Rio is provided in Appendix 6.

10. In its August 13, 2003, letter to ODI regarding the MY 2001 Rio, Kia provided information in response to a question by ODI requesting material related to warranty claims. Attachment 1 lists warranty claims paid pertaining to the flexible high-pressure fuel supply line and the fuel injector rail. Certain part numbers listed in the column labeled "REPLY PART NO" are succeeded by an asterisk that notes "\*\*Part not replaced as part of repair." However, according to Kia's Labor Time Standard manual, the labor operation code listed for the claim states the operation (e.g., 31347R00) was for a part replacement. Please clarify the apparent discrepancy between the labor operation code and the asterisk on replacement of the part(s).

Kia has not yet completed its investigation, and will supplement this response when this information is ascertained.

11. In its September 22, 2003, letter to ODI regarding the subject recall, Kia provided a defect information report. Kia made a determination that fuel leaks may develop because of quality deviations in the fuel injector rail service port valve or the flexible high-pressure fuel supply line. Pursuant to 49 C.F.R. § 573.6(e)(5), please describe in detail the exact nature of the quality deviations – e.g. material composition, dimensional tolerances, etc. – and furnish Kia's assessment of the defect in the subject recall, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses; and
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning.

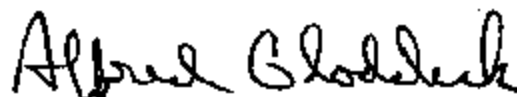
Kia has not yet completed its investigation, and will supplement this response when this information is ascertained.

12. In its August 13, 2003, letter to ODI regarding the subject recall, Kia reports that "neither [the Fuel Distributor Assembly or the Main Fuel Tube Assembly] has been substantially modified since their introduction in the 2001 model year." Explain in detail how Kia determined that the defect is limited to only the MY 2001 Kia Rio and why the scope of Kia's recall does not extend to subsequent model year vehicles such as new Rio and Rio Cinco Vehicles that use the same or similar fuel system components as the MY 2001 Rio.

Kia has not yet completed its investigation, and will supplement this response when this information is ascertained.

Kia is continuing to assemble further information requested in your letter and will submit such information as it becomes available.

Sincerely yours,



Alfred Gloddeck  
Sr. Manager – Corporate Affairs