

# HONDA

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November 29, 2004

OFFICE OF DEFECTS  
INVESTIGATION

NVS-213dsy  
DP04-006

Mr. Jeffrey L. Quandt, Chief  
Vehicle Control Division  
Office of Defects Investigation  
U.S. DEPARTMENT OF TRANSPORTATION  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, DC 20590

Dear Mr. Quandt:

In reply to your letter dated October 14, 2004, we are submitting a partial response regarding the petition on ignition-interlock systems of 1999-2001 Accords equipped with automatic transmissions, beyond the scope of recall campaign 03V-423.

1. State, by model year, the number of subject vehicles Honda has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Honda, state the following:
  - A. Vehicle identification number (VIN);
  - B. Date of manufacture;
  - C. Date warranty coverage commenced; and
  - D. 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, titled "PRODUCTION DATA." See Enclosure 1, DP04-006 IR Attachments, for a pre-formatted table (response template) which provides further details regarding this submission. Honda's response must adhere precisely to the format defined in this file.

Response:

Items "a" through "d" are on the enclosed data CD in the PRODUCTION DATA file.

Model	Year	Sales
Accord	1999	393,706
	2000	430,478
	2001	379,356
Total		1,203,540

Source: Units file containing information on all vehicles received from the factories.  
As of: 11/01/2004

2. State the number of each of the following, received by Honda, or of which Honda are 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. Property damage claims;
  - E. Third-party arbitration proceedings where Honda is or was a party to the arbitration; and
  - F. Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant.

For subjects "a" through "d," 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 field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and Honda's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," 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.

Response:

The total number of reports for items "a" through "f" are stated in the table below.

Model	Year	Consumer Complaints	Field Reports	Crash, Injury, or Fatality	Property Damage Claims	Third-Party Arbitration	Lawsuits
Honda Accord	1999	13	3	3	0	0	0
	2000	20	21	6	1	0	0
	2001	6	8	2	0	0	0

Item "c": Honda identified 11 reports of parked vehicles rolling and being damaged. No injuries or fatalities were identified.

Item "d": Honda identified one property damage claim in its review.

Item "e": Honda did not identify any third-party arbitration cases in its review.

Item "f": Honda did not identify any lawsuits in its review.

Summary descriptions for items "c" through "f" can be found in the COMPLAINT DATA file on the enclosed CD.

Source(s): Customer Relations, Dealer Tech Line, Field Reports, Legal  
 As of: 11/09/2004

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. Honda'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 property damage is alleged;
- K. Number of alleged injuries, if any;
- L. Number of alleged fatalities, if any; and
- M. Summary (items "c" through "f" only).

Provide this information in Microsoft Access 2000, or a compatible format, titled "COMPLAINT DATA." See Enclosure 1, DP04-006 IR Attachments, for a pre-formatted table (response template) which provides further details regarding this submission. Honda's response must adhere precisely to the format defined in this file.

Response:

Items "a" through "m" are on the data CD in the COMPLAINT DATA file.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits  
As of: Through 11/09/2004

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 complaints, field reports, etc.) and describe the method Honda used for any further organization of the documents.

Response: See Attachment #Q4.

Method of document organization: Documents are organized separately by category. Reports within each category are sorted numerically based on model year. Within model year they are sorted by the last six digits of the VIN.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits  
As of: 11/09/2004

5. State, by model year, a total count for all of the following categories of claims, collectively, that have been paid by Honda to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for goodwill 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. Honda'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, titled "WARRANTY DATA." See Enclosure 1, DP04-006 IR Attachments, for a pre-formatted table (response template) which provides further details regarding this submission. Honda's response must adhere precisely to the format defined in this file.

Response:

Items "a" through "k" are on the data CD in the WARRANTY DATA file.

Note: Honda's warranty system does not collect vehicle owner name and telephone number.

Model Year	Warranty Claims	Extended Warranty Claims	Goodwill Services	Field Zone or Similar Adjustments
Honda Accord	1999	38	23	0
	2000	63	34	0
	2001	32	14	0
Totals		133	71	0

Source(s): Warranty claim data for MY1999-2001 Accord  
As of: Through 11/05/2004

6. Describe in detail the search criteria used by Honda 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 Honda 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 Honda 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.

Response: See Attachment #Q6.

Search criteria: Using MY1999-2001 Accord warranty data, claims were pulled based on part numbers for the steering lock assembly and key cylinder set. VINs affected by campaign 03V-423 were excluded. The contention text description for each claim was manually reviewed to identify relevant claims. A secondary search was done against the claim data on part numbers for the recall repair kits. Some dealers used the kits to repair vehicles outside the recall. The combination of searches should have identified all relevant claims.

Warranty coverage: The 1999-2001 Honda Accords are covered by a new vehicle limited warranty for three years or 36,000 miles, whichever comes first. Under the terms of the new vehicle limited warranty, Honda will repair or replace any part that is defective in material or workmanship under normal use. This warranty covers all systems except emission control systems, accessories, battery or tires, which have their own warranties. Honda has not issued any extended warranty related to the alleged defect in the subject vehicles.

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 Honda 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 Honda is planning to issue within the next 120 days.

Response: See Attachment #Q7

Honda recall bulletin 03-088 and Acura recall bulletin 03-034 are related to the alleged defect in the subject vehicles. Service News articles giving tips on the recall repair are also enclosed.

Also enclosed is a Service News article titled, "Don't Rekey Ignition Switches." In some cases after an ignition switch was rekeyed, the key could be removed when the vehicle was in gear.

At this time, no communications are planned within the next 120 days because Honda is still investigating the potential causes.

8. Describe all assessments, analyses, 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, Honda. 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 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.

Response:

Honda is still investigating the potential causes and will complete this response in the final submission.

9. Describe all modifications or changes made by, or on behalf of, Honda in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- A. The date or approximate date on which the modification or change was incorporated into vehicle production;
- B. A detailed description of the modification or change;
- C. The reason(s) for the modification or change;
- D. The part numbers (service and engineering) of the original component;
- E. The part number (service and engineering) of the modified component;
- F. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- G. When the modified component was made available as a service component; and
- H. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Honda is aware of which may be incorporated into vehicle production within the next 120 days.

Response:

Honda did not identified any modifications or changes responsive to this request within Honda. We are continuing to investigate vendors.

10. State the number of recall completion kits, Key Interlock Repair Kit A, part number 08351-384-000, H/C 7847829 and Key Interlock Repair Kit B, part number 08352-384-000, H/C 7847837, that Honda has sold by month and year of sales.

Response:

Month/Year	Number Sold	
	Repair Kit A	Repair Kit B
12-2003	57,045	48,831
01-2004	78,611	34,574
02-2004	73,811	11,649
03-2004	43,070	7,327
04-2004	17,269	2,874
05-2004	21,084	3,859
06-2004	11,360	2,100
07-2004	8,716	1,596
08-2004	7,713	1,446
09-2004	5,542	1,080
10-2004	4,598	865

11. For the vehicles within the scope of recall action 03V-423, state by make, model and model year:

- A. The total number of vehicles involved in the action;
- B. The number of recall repairs with warranty claim operation number 725502 that Honda has performed (paid for) to date; and,
- C. The number of recall repairs with warranty claim operation number 725503 that Honda has performed (paid for) to date.

Response:

- A. The total number of vehicles involved in the action is 563,256, including:  
 Certain 1998-1999 Honda Accord; 1999 Honda Odyssey, Acura 2.3CL, 3.0CL, 3.2TL;  
 All 1998 Honda Accord, Acura 2.3CL and 3.0CL.
- B. The number of recall repairs with warranty claim operation number 725502 that Honda has performed (paid for) through November 5, 2004 is:

Make	Model	MY	Recall Repairs for 725502
Honda	Accord	1998	143,144
		1999	49,485
	Odyssey	1999	9,353
Acura	2.3CL	1998	2,433
		1999	1,333
	3.0CL	1998	5,618
		1999	2,605
	3.2TL	1999	9,870
Total			223,841

- C. The number of recall repairs with warranty claim operation number 725503 that Honda has performed (paid for) to date.

Make	Model	MY	Recall Repairs for 725503
Honda	Accord	1998	18,982
		1999	9,905
	Odyssey	1999	1,742
Acura	2.3CL	1998	564
		1999	365
	3.0CL	1998	1,014
		1999	730
	3.2TL	1999	2,680
Total			35,982



12. Furnish Honda's assessment of the alleged defect in the subject vehicle, 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;
- 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; and,
- F. The reports included with this inquiry.

Response:

As of this partial response date, Honda is still investigating the potential causes.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

*William R. Willen (ke)*

William R. Willen  
Managing Counsel  
Product Regulatory Office

WRW:ke

Attachments