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EA04-007.143

VIA FEDERAL EXPRESS

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
NHTSA
2000 JUL 19 A 11:26
OFFICE OF DEFECTS
INVESTIGATION

Re: Recall Campaign: 1999-2000 Model Year Sephia and Sportage Front Seat Belt Buckles,
and 2000 Model Year Spectra Front Seat Belt Buckles

Dear Mr. Cooper:

This letter is sent in conjunction with Kia's decision to recall 1999-2000 Kia Sephia and Sportage models, and 2000 Spectra models, equipped with A97 front seatbelt buckle assemblies manufactured by Duck Boo International Co., Ltd. Provided below is Kia's response to Mr. Lee Strickland's request for additional information regarding complaints, field reports, crash incidents, injuries, fatalities and warranty claims relating to seatbelt buckle assemblies that are the subject of the above-referenced recall.

This response is based on consumer communications from Kia's Consumer Affairs database describing an unintended release of front seatbelt buckles in the affected vehicle model years due to a false latch condition. These communications vary significantly in detail and responsiveness. Tables 1 and 2 summarize the total number of consumer communications for the 1999 and 2000 model years that reported a possible buckle release and false latch, a possible buckle malfunction of an unknown nature, or an alleged problem with the seatbelt assembly (not necessarily buckle related) of an unknown nature.

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Sephia	11	5	28	44
Spectra	na	na	na	na
Sportage	6	5	4	15

Sephia	6	6	9	21
Spectra	0	0	0	0
Sportage	2	1	6	9

Tables 3 through 7 below summarize the number of crashes, injury crashes, fatal crashes, and property damage only crashes for those consumer communications that provided enough information to indicate an alleged or potentially alleged false latch incident. Incidents meeting this criteria are included even where a post-report inspection showed that the front seatbelt buckle assemblies were functioning properly. These tables do not include communications where the customer indicated a seatbelt malfunction of some unknown type, but where the information available was not sufficient to identify the nature of the problem. For example, complaints such as "seatbelt is inoperative" or "seatbelts are not working," which could relate to buckle issues or to any other component of the seatbelt assembly such as the retractor, were not included because such complaints do not provide information sufficient to confirm, one way or the other, whether the customer was reporting an unintended buckle release and/or false latch issue. Finally, please note that the conditions reported in these communications were not verified and that in instances where Kia and/or one of its dealers had the opportunity to conduct post-report inspections it was found that the seatbelt functioned normally and as designed, or that a post-manufacture condition such debris or a foreign substance in the buckle may have caused the alleged malfunction.

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Total Number of Consumer Communications	44
Field Reports in Addition to Above-Referenced Consumer Communications	0
Total Number of Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	16
➤ Total Number of Crashes Identified in Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	5
• Total Number of Fatal Crashes	0
○ Total Number of Fatalities	0
• Total Number of Injury Crashes	3
○ Total Number of Injuries	5
• Total Number of Property Damage Only Crashes	2

Total Number of Consumer Communications	21
Field Reports in Addition to Above-Referenced Consumer Communications	0
Total Number of Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	12
➤ Total Number of Crashes Identified in Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	7
• Total Number of Fatal Crashes	0
○ Total Number of Fatalities	0
• Total Number of Injury Crashes	6

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o Total Number of Injuries	7
• Total Number of Property Damage Only Crashes	1

Total Number of Consumer Communications	15
Field Reports in Addition to Above-Referenced Consumer Communications	0
Total Number of Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	11
➤ Total Number of Crashes Identified in Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	4
• Total Number of Fatal Crashes	0
o Total Number of Fatalities	0
• Total Number of Injury Crashes	3
o Total Number of Injuries	4
• Total Number of Property Damage Only Crashes	1

Total Number of Consumer Communications	9
Field Reports in Addition to Above-Referenced Consumer Communications	0
Total Number of Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	3

➤ Total Number of Crashes Identified in Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	1
• Total Number of Fatal Crashes	0
○ Total Number of Fatalities	0
• Total Number of Injury Crashes	0
○ Total Number of Injuries	0
• Total Number of Property Damage Only Crashes	1

Total Number of Consumer Communications	0
Field Reports in Addition to Above-Referenced Consumer Communications	0
Total Number of Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	0
➤ Total Number of Crashes Identified in Consumer Communications and Field Reports Indicating a Possible Unintended Buckle Release or False Latch Condition	0
• Total Number of Fatal Crashes	0
○ Total Number of Fatalities	0
• Total Number of Injury Crashes	0
○ Total Number of Injuries	0
• Total Number of Property Damage Only Crashes	0

Table 8 provides the number of warranty claims received which involved replacement of driver side front seatbelt assemblies that incorporate the A97 buckle. Since there is no way to isolate only those claims that relate to an unintended buckle release or false latch condition, all claims

4844-4056-2688.1

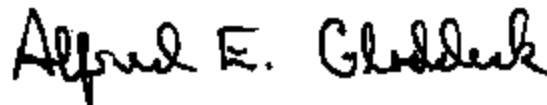
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have been included regardless of cause or condition code. Kia believes that only a very small percentage of these claims, if any, related to the subject condition.

2000 Sephia & Spectra Combined	181
2000 Sportage	352
1999 Sephia	327
1999 Sportage	294

If you or your staff have any questions or comments regarding this response, please contact the undersigned.

Very truly yours,



Alfred E. Gloddeck
Senior Manager – Corporate Affairs