

HONDA

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April 23, 2004

NVS-213phk
PE04-018

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

*Rev'd
ODI
4/27/04*

Dear Mr. Quandt:

In reply to your letter dated March 5, 2004, we are submitting our responses regarding alleged engine fires in model year 2003 Honda CR-V vehicles.

1. State 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. 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, titled "PRODUCTION DATA." See enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response:

The data elements "a" through "g" are filed on the enclosed CD-R in a series of three Excel files.

Model	Model Year	Sales
Honda CR-V	2003	140,059

Source: Units file containing information on all vehicles received from the factories.
As of: 02/29/2004

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. Reports involving a fire, 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;
 - E. Property damage claims; and
 - F. Third-party arbitration proceedings where Honda is or was a party to the arbitration; and
 - G. Lawsuits, both pending and closed, in which Honda 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 field 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 Honda'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.

Response: See Attachment #Q2.

The total number of reports for items "a" through "e" are stated in the table below. Honda has internal records of 32 separate incidents related to the alleged defect.

Model:	Model Year:	A	B	C	D	E	F	G
		Consumer Reports	Field Reports	Crash, Injury, or Fatality	Fire	Property Damage Claims	Third-Party Arbitration	Lawsuits
Honda CR-V	2003	27	25	1	22	1	0	1

Item "c": Honda identified one report of a crash when one CR-V was struck by another vehicle while parked at the side of the road.

Item "d": Honda identified 22 fire reports within items "a" and "b."

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

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

Item "g": Honda identified one property damage lawsuit in its review.

Summary descriptions for items "c" through "g" can be found in Attachment #Q2.

Source(s): Customer Relations, Dealer Tech Line, Field Reports, Legal
 As of: 02/29/2004

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 a fire is alleged;
 - K. Whether property damage is alleged;
 - L. Number of alleged injuries, if any; and
 - M. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, titled "REQUEST NUMBER TWO DATA." See enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response:

The data elements "a" through "m" are filed on the enclosed CD-R.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits
As of: Through 02/29/2004

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., crash complaints, field reports, etc.) and describe the method Honda used for organizing the documents. Provide copies of the complete service histories for each vehicle identified within the scope of Request No. 2.

Response: See Attachment #Q4.

Method of document organization: If a customer complaint or field/dealer report pertains to a fire, it is organized under fire reports. Reports within each category are sorted numerically based on the last six digits of the VIN. Any associated photographs are provided on CD-R in individual folders for each VIN.

Service histories: Honda does not possess complete service histories for vehicles in the market. Service history information is maintained at the dealer level.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits
As of: 02/29/2004

5. State, by model and 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, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response:

The data elements "a" through "k", are filed on the enclosed CD-R.

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

Model	Model Year	Warranty Claims	Goodwill Claims	Extended Warranty Claims
Honda CR-V	2003	164	0	0

Source(s): Warranty claim data for MY2003 CR-V
As of: Through 02/29/2004

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 MY2003 CR-V warranty data, claims were pulled based on oil filter part numbers. The contention text description was reviewed for each claim to identify oil leaks. Additionally, a word search of warranty claim contention text was also conducted to find fire, burning and smoking.

Warranty coverage: The 2003 CR-V is 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 extended warranty coverage related to the alleged defect in the 2003 CR-V.

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.

Attachment Q7 contains one issue of Honda Service News for May 2002 that contains an article on page 3 about new oil filter installation.

Honda is considering publishing an additional communication within the next 120 days, but a draft has not been created.

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 has not identified any actions responsive to this request.

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 has not identified any modifications or changes responsive to this request.

10. Produce an exemplar sample of each version of the subject component used by Honda in the subject vehicles.

Response: See Attachment #Q10A-10B

Each version of the subject component:

15400-PLC-003	Oil filter installed during production (MAHLE Tennex)	Sample not available
15400-PLC-004	Oil filter installed during production (Toyo Roki)	Sample not available
15400-PLM-A01	Service parts oil filter (Filtech)	Attachment #Q10A
15400-PLM-A02	Service parts oil filter (Honeywell)	Attachment #Q10B

11. 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:

The subject oil fires were the result of service errors. Our review of the fire reports indicates each fire was caused by oil leaking from the oil filter. The evidence collected to date indicates the ignition source is the exhaust system. Of the 22 fires, we confirmed that five oil filters had stacked seals (double-gasketing), and nine oil filters had distorted or pinched seals.

The data suggests that some service technicians may not follow the necessary procedures when changing the oil filter. All steps are necessary when installing Honda oil filters.

1. Remove the oil filter with the special oil filter wrench.
2. Inspect the threads and rubber seal on the new filter. Wipe off the seat on the engine block, then apply a light coat of oil to the filter rubber seal. Use only filters with a built-in bypass system.
3. Install the oil filter by hand.
4. After the rubber seal seats, tighten the oil filter 3/4 of a turn clockwise with the special tool.
5. After installation, fill the engine with oil up to the specified level, run the engine for more than 3 minutes, then check for oil leakage.

Failure to follow steps two or four can result in oil filter leakage. We surmise that underhood air turbulence uniquely distributes leaking oil in each model and contributes to oil fires in certain models even though all models can experience filter leaks.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

WRW:ke

Attachments