

# HONDA

American Honda Motor Co., Inc.  
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Torrance, CA 90501-2748  
Phone (310) 788-2000

September 17, 2004

NVS-212pco  
PE04-053

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

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Dear Mr. Quandt:

In reply to your letter dated August 3, 2004, we are submitting a partial response regarding alleged driver front airbag tearing in model year 2004 Honda Accord vehicles.

1. State, by model and 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. 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."

Response:

The data elements "a" through "g" are filed on the enclosed CD-R. (Note: If a record does not have a date stored for "warranty start date" or WSD, this indicates the car was in dealer inventory.)

*to be provided in Honda's final submission 4/20/04 pco*

Make	Model	Model Year	Body	Sales
Honda	Accord L4	2004	4D	199,732
			2D	25,998
	Accord V6		4D	93,396
			2D	22,826
Total				341,952

Source: Units file containing information on all vehicles received from the factories.  
As of: 07/31/2004

2. State the number of each of the following, received by Honda, or of which Honda 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. 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 subparts "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:

Honda did not identify any reports related to the alleged defect in the subject vehicles.

Model	Model Year	A Owner/ Fleet Reports	B Field/ Dealer Reports	C Crash, Injury, Fatality Reports	D Property Damage Claims	E Third-Party Arbitration	F Lawsuits
Honda Accord	2004	0	0	0	0	0	0

Source(s): Customer Relations, Dealer Tech Line, Field Reports, Legal  
As of: 08/04/2004

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your responses 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; and
- L. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, titled "REQUEST NUMBER TWO DATA."

Response:

No reports were identified for Request No. 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 complaints, field reports, etc.) and describe the method Honda used for organizing the documents.

Response:

No reports were identified for Request No. 2.

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."

Response:

Honda did not identify any warranty claims related to the alleged defect in the subject vehicles.

Source(s): Warranty data for model year 2004 Accord  
As of: 08/03/2004

8. 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:

Search criteria: Using MY2004 Accord warranty data, claims were pulled based on driver airbag part number. A word search of the contention text description was then conducted to find: tear, torn, burst, rip, cut, slice. The resulting claims were read individually, but no claims relevant to the alleged defect were identified.

Warranty coverage: The 2004 Accord 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 2004 Accord.

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:

Honda has not issued any documents related to the alleged defect in the subject vehicles. Honda has no current plan to issue any communications within the next 120 days, but we are still studying the issue.

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 studying the issue and will address this response in our final submission.

9. Describe all modifications or changes made by, or on behalf of, Honda in the design, material composition, manufacturing, 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 two of each of the following:

- A. Exemplar samples of each design version of the subject component (with the initiator removed);
- B. Exemplar samples of a folded subject airbag;
- C. Field return samples of the subject component exhibiting the subject failure mode; and
- D. Any kits that have been released, or developed, by Honda for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Response:

- A. One sample is enclosed.
  - B. The sample for A also applies to this request. An additional airbag was sent to Chris Wiacek, ODI, on July 19, 2004.
  - C. None returned.
  - D. None were created.
11. Provide a summary description of the vehicle's advanced airbag system including a component summary and compare the current system to the previous system of the driver airbag module used in the subject vehicle, including:
- A. Functional block/flow diagram;
  - B. Picture/illustration of the components and component location including airbag module, crash sensors, occupant sensors and the electronic module; and
  - C. Summary table outlining the differences between the two versions including comparison of the steering wheel, module cover, module housing, horn assembly, airbag size/volume, fabric material, fabric construction, fabric coating, fold pattern and initiator(s) designs.

Response:

Honda is still studying the issue and will address this response in our final submission.

12. Provide high speed video (at least 4,000 fps) of a driver airbag deployment showing clearly the deployment/inflation sequence with timing or frame counter, including:

- A. Parameters of test (full frontal, vehicle speed, belted, seat position, scale, type of crash test dummy, etc.);
- B. Driver-side view of the driver airbag deployment;
- C. Overhead view of the driver airbag deployment; and
- D. Rear view (looking at the front airbag) of the driver deployment.

Response:

Honda is still studying the issue and will address this response in our final submission.

13. 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:

Honda is still studying the issue and will address this response in our final submission.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen  
Managing Counsel  
Product Regulatory Office

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Attachments