

HYUNDAI AMERICA TECHNICAL CENTER, INC.

A Subsidiary of
Hyundai Motor Company (Korea)

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February 25, 2005

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

RE: NVS-212-pco, PE04-081

Dear Mr. Cooper:

This letter responds to your above referenced request for information, dated January 19, 2005. Although the response to NHTSA's request was due on February 21, 2005, NHTSA verbally agreed on February 15, 2005 to extend the response due date until February 28, 2005.

Prior to responding to the request, Hyundai objects to NHTSA's boilerplate definition of "Document" as vague, incomprehensible, overly broad and unduly burdensome. Hyundai has made a good faith, reasonable attempt to search for materials responsive to each request in the time frame provided.

Please note that 2002 model year Sonatas produced through February 7, 2002 were recalled to replace the side impact satellite sensors to reduce the potential for inadvertent side impact airbag deployment. The NHTSA recall number is 02V-145.

Request 1.

State, by model and model year, the number of subject peer vehicles Hyundai has manufactured for sale or lease in the United States. If there are multiple side air bag system designs or versions for a given subject peer vehicle, please identify under section "e." Separately, for each model subject vehicle manufactured to date by Hyundai, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Airbag system model version (if more than one),
- f. Date of manufacture;
- g. Date warranty coverage commenced; and
- h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease),

HYUNDAI AMERICA TECHNICAL CENTER, INC.

Response to Request 1.

Model	Model Year	Production Quantity
Elantra	2001	104,062
Elantra	2002	116,548
Elantra	2003	127,531
Sonata	2001	46,085
Sonata	2002	78,394
Sonata	2003	76,007
Tiburon	2003	39,984

See Attachment "PRODUCTION DATA.mbd" for additional requested information.

Source: Hyundai Motor America
Information as of January 28, 2005

Request 2.

State the number of each of the following, received by Hyundai, or of which Hyundai is otherwise aware, which relate to, or may relate to, the subject condition in the subject peer 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 (including own vehicle); and
- e. Third-party arbitration proceedings where Hyundai is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Hyundai 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). Identify reports that have a duplicate with either other mfg reports/claims or with ODI.

In addition, for items "b" through "f," provide a summary description of the alleged problem and causal and contributing factors and Hyundai's assessment of the problem, with a summary of the significant underlying facts and evidence along with any photographs and airbag control module diagnostic result/readout/printout (along with explanation/description). For items f and

HYUNDAI AMERICA TECHNICAL CENTER, INC.

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 to Request 2.

a. Consumer complaints, including those from fleet operators;

Model / Model Year	2001	2002	2003
Sonata	5 (includes 2 duplicates)	60 (includes 16 duplicates)	2 (includes 2 duplicates)
Elantra	11 (includes 3 duplicates)	2	3 (includes 1 duplicate)
Tiburon			38 (includes 10 duplicates)

b. Field reports, including dealer field reports;

Model / Model Year	2001	2002	2003
Sonata	3	29 (includes 6 duplicates)	1 (includes 1 duplicate)
Elantra	None	None	1
Tiburon			3

See Attachments A and B for additional requested information.

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;

Model / Model Year	2001	2002	2003
Sonata	None	13 (includes 8 duplicates)	1 (includes 1 duplicate)
Elantra	1 (includes 1 duplicate)	None	1 (includes 1 duplicate)
Tiburon			3 (includes 3 duplicates)

See Attachment A and B for additional requested information.

HYUNDAI AMERICA TECHNICAL CENTER, INC.

d. Property damage claims (including own vehicle); and

Model / Model Year	2001	2002	2003
Sonata	2 (includes 2 duplicates)	9 (includes 8 duplicates)	None
Elantra	3 (includes 3 duplicates)	None	1 (includes 1 duplicate)
Tiburon			10 (includes 10 duplicates)

See Attachment A and B for additional requested information.

e. Third-party arbitration proceedings where Hyundai is or was a party to the arbitration; and

There have been no third-party arbitration proceedings.

f. Lawsuits, both pending and closed, in which Hyundai is or was a defendant or codefendant.

There have been no lawsuits.

Source: Hyundai Motor America

Information as of January 28, 2005 for 2a and 2b and as of February 3, 2005 for 2c, 2d, 2e, and 2f.

Request 3.

State, by model and model year, the number and total count for all of the following categories of claims, collectively, that have been paid by Hyundai to date that relate to, or may relate to, the subject condition in the subject peer 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.

Response to Request 3.

See Attachment "WARRANTY DATA COUNT.xls" for requested information.

Source: Hyundai Motor America

Information as of January 28, 2005

HYUNDAI AMERICA TECHNICAL CENTER, INC.

Request 4.

Describe in detail the search criteria used by Hyundai to identify the claim identified in response to Request No. 3, 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Hyundai on the subject peer vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered) and if it covers inadvertent side-airbag deployments (without an actual side crash, but sensors did sense a shock pulse). Describe any extended warranty coverage option(s) that Hyundai offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty and if it covers inadvertent side-airbag deployments.

Response to Request 4.

Hyundai's warranty system does not have a code to identify airbag deployment. Hyundai's warranty system does not contain any verbal or symbolic method to determine claims that relate to airbag deployment. Claims involving the components related to side airbags may be made for many reasons unrelated to airbag deployment. However, in an effort to provide a meaningful response to Request 3, Hyundai utilized the following process.

Hyundai's service procedures, as described in a Technical Service Bulletin, require that the following components be replaced after a side airbag deployment:

- The seat back assembly, which contains the side airbag
- The airbag wiring harness
- The SRS Control Module
- The satellite sensor for the side where the airbag deployed

Therefore, warranty data provided in response to Request 3 was developed based upon the replacement of these four components on the same repair order or repair date.

All Labor Operation Codes beginning with 88, designating the Front Seat, were scanned for claims that also contained any Labor Operation Codes beginning with 95910, for the SRS Control Module, 95920, for the Satellite Sensor, and 9170 for the Airbag Wiring Harness.

Hyundai also checked if additional possibly relevant warranty claims were filed for any of the vehicles reported in response to Request 2 and has also included those claims.

The Hyundai New Vehicle Limited Warranty period is limited to 60 months from the date of original retail delivery or date of first use, or 60,000 miles, whichever occurs first. The entire occupant restraint system is covered by the Hyundai New Vehicle Limited Warranty, including inadvertent side-airbag deployments, if they occur or occurred.

HYUNDAI AMERICA TECHNICAL CENTER, INC.

Hyundai offered two extended warranty options for the subject peer vehicles. One plan offered coverage for 72 months or 75,000 miles and the second plan offered coverage for 120 months or 100,000 miles from the date of first use. The number of vehicles covered under each extended warranty plan is as follows:

72 months or 75,000 miles plan

Model / Model Year	2001	2002	2003
Sonata	430	743	571
Elantra	921	1,213	1,024
Tiburon			399

120 months or 100,000 miles plan

Model / Model Year	2001	2002	2003
Sonata	5,023	9,234	9,061
Elantra	10,714	12,740	13,970
Tiburon			4,413

Neither Hyundai extended warranty plan covers airbags or inadvertent side-airbag deployments, if they occur or occurred

Source: Hyundai Motor America
Information as of February 23, 2005

Request 5.

Provide a table showing the following information concerning the side-impact airbag systems in the subject peer vehicles by model and model year:

- type of side air bag system (thorax, head, curtain or combination thereof);
- location of each seating position at which a side air bag system is installed;
- the number of side air bags at each of those seating positions; and
- bag location (seat mounted, door mounted, etc.)

Response to Request 5.

- type of side air bag system (thorax, head, curtain or combination thereof);

Combined Head and Thorax type

- location of each seating position at which a side air bag system is installed;

Driver and right front passenger seats

HYUNDAI AMERICA TECHNICAL CENTER, INC.

c. the number of side air bags at each of those seating positions; and

One combined Head and Thorax side air bag each for the driver and right front passenger seats

d. bag location (seat mounted, door mounted, etc.)

Seat mounted

Source: Hyundai Motor Company
Information as of February 4, 2005

Request 6.

For each model, model year of the subject peer vehicles, identify the supplier of the side-impact crash sensing system and electronic restraint module. Please provide a complete street address, contact name, and telephone number for each supplier identified.

Response to Request 6.

Side Impact Sensor Suppliers:

Model	Model Year	Supplier	Street Address	Contact	Telephone Number
Elantra	2001 – 2003	Delphi E & S	Delphi Automotive Systems Singapore Pte Ltd 501 Ang Mo Kio Industrial Park 1 Singapore 569621	Mr. S. Ganesan	(65) 6450 8269
Sonata	2001 – 2003	Siemens Automotive System Corporation	403-2, Saem-Dong, Icheon-City, Kyong-Do, Korea	Mr. Sang-Hack Lee	82-31-630-0697
Tiburon	2003	Hyundai AUTONET Co., Ltd	San 136-1, Ami-Ri, Bubal-Eub, Ichon-Si, Kyoungki-Do, 467-860 Korea	Mr. Man-Young Yang	82-31-639-7848

HYUNDAI AMERICA TECHNICAL CENTER, INC.

Side Air Bag Module Suppliers:

Model	Model Year	Supplier	Street Address	Contact	Telephone Number
Elantra	2001 – 2003	Key Safety Systems, Inc.	7000 Nineteen Mile Road Sterling Heights, MI 48314, U.S.A	Mr. Garry Hayes	586-726-3889
Sonata	2001 – 2003	Key Safety Systems, Inc.	7000 Nineteen Mile Road Sterling Heights, MI 48314, U.S.A	Mr. Garry Hayes	586-726-3889
Tiburon	2003	Delphi Korea Corp.	5-30 Bangye-Ri, Munmak- Eup, Wonju-Si Kangwon-Do, Korea, 220-805	Mr. Myung- Ryun, Jang	(82)-33- 730-2189

Side Air Bag Wiring Suppliers:

Model	Model Year	Supplier	Street Address	Contact	Telephone Number
Elantra	2001 – 2003	Kyungshin Industrial Co., Ltd.	463-5 Deokji-Ri, Eumbong-Myun, Asan-Si, Chungnam, Korea	Mr. Jin-Seo Mo	(82)-41- 539-3764
Sonata	2001 – 2003	Sewon-Ecs Co., Ltd.	483-4, Yeulam-Ri, Paltan- Myun, Hwasung-Si, Kyunggi-Do, Korea	Mr. Ji-Sun Lim	(82)-31- 350-8530
Tiburon	2003	Dong Hae Electrics Co., Ltd.	973-3 Galsan-Dong, Dalseo-Ku, Daegu City, Korea	Mr. Seok-Jae Lee	(82)-53- 589-8905

Source: Hyundai Motor Company
Information as of February 4, 2005

Sincerely,



Alfred Gloddeck
Senior Manager, Corporate Affairs

Attachments: 4

Note: Attachments "PRODUCTION DATA.mbd", Attachment A, and "WARRANTY DATA COUNT.xls" are contained on a CD. Attachment B is paper.