

# HONDA

American Honda Motor Co., Inc.  
1919 Torrance Boulevard  
Torrance, CA 90501 2/48  
Phone (310) 783 2000

RECEIVED  
NVS-212

2005-11-07 10:23:00

November 7, 2005

OFFICE OF DEFECTS INVESTIGATION  
U.S. DEPARTMENT OF TRANSPORTATION

NVS-212pco  
PE05-043

*John W. 11/21/05*

Mr. Thomas Z. Cooper, Chief  
Vehicle Integrity 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. Cooper:

In reply to your letter dated August 19, 2005, we are submitting a final response regarding alleged SRS light illumination caused by the OPDS system in model year 1999-2003 Honda Accord vehicles equipped with side-impact airbags. This response supplements our correspondence dated October 7, 2005.

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. Make;
  - B. Model;
  - C. Model Year;
  - D. Vehicle trim level (LE, EX etc...);
  - E. Side airbag as standard equipment with trim level, leather seats or others (specify);
  - F. Vehicle Identification number (VIN);
  - G. Date of manufacture;
  - H. Date warranty coverage commenced; and
  - I. 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:

Refer to response dated October 7, 2005.

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 "f" 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:** See Attachment 2

The counts presented in the table below are complaints/reports specifying a trouble code of 15-3. Refer to attachment 2 for "c" through "f" summary descriptions.

Note: Honda does not have any Accord fleets.

Model	Model Year	A Owner Fleet Reports	B Field Dealer Reports	C Crash, Injury, Fatality Reports	D Property Damage	E Third-Party Action	F Lawsuits
Accord	2000	129	1,789	0	0	0	0
	2001	72	1,488	0	0	5	4
	2002	17	453	0	0	6	0
	2003	0	0	0	0	0	0

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
 As of: 09/02/2005

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; 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:**

Refer to the enclosed CD for this data file.

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:

Refer to the enclosed data CD for copies of all documents, which are being submitted in PDF. The files are organized by category, then model year. Complaints and arbitrations are sorted by customer last name. Dealer reports are presented in Excel format and model year, report date, file ID.

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:

The counts presented in the table are claims specifying a trouble code of 15-3. Goodwill claims have not been determined yet.

Model	Model Year	Warranty	Goodwill	Extended Warranty
Accord	2000	8,538	TBD	0
	2001	8,122	TBD	0
	2002	2,648	TBD	0
	2003	24	TBD	0
	Total	15,333	TBD	0

Source(s): Warranty claim data.  
As of: 09/25/2005

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-B

Refer to response dated October 7, 2005 for search criteria.

Coding and descriptions are listed in attachment Q6-B.

**Warranty Coverage:** The 2000-2003 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 extended warranty coverage 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:

Refer to response dated October 7, 2005.

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 for 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:** See Attachment Q8

**Action #1:**

- A. QIS# S84A-000315-01
- B. Start date March 15, 2000
- C. End date March 31, 2000
- D. Investigate SRS light on and DTC 15-3 for possible countermeasure.
- E. Market Quality Department in Marysville, OH
- F. Resulted in countermeasure. Refer to document for detailed explanation.

**Action #2:**

- A. QIS# S84A-010207-01
- B. Start date February 7, 2001
- C. End date April 5, 2002
- D. Investigate SRS light on and DTC 15-3 after countermeasure.
- E. Market Quality Department in Marysville, OH
- F. Resulted in countermeasure. Refer to document for detailed explanation.

**Action #3:**

- A. QIS# MV20010319105151
- B. Start date February 9, 2001
- C. End date April 3, 2001
- D. Investigate SRS light on and DTC 15-3.
- E. Market Quality Block in Sayama, Japan
- F. No countermeasure is taken because the returned OPDS unit was determined to be a non-defective unit. Refer to document for detailed explanation.

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:

**Modification #1:**

- A. Applied to production between May 24, 2000 and June 28, 2000.
- B. Software change.
- C. Resolve inability to detect errors during power supply voltage fluctuation or momentary power loss due to quickly cycling the ignition key.
- D. 81334-887-A71
- E. No change.
- F. Not withdrawn.
- G. Ongoing.
- H. Interchangeable.

**Modification #2:**

- A. Applied to production between December 6, 2001 and April 1, 2002.
- B. Substrate coating changed, sensor connector resistance increased, and software changes.
- C. Seat pad sensor material was susceptible to moisture, which affected proper operation.
- D. 81334-880-A61
- E. No change.
- F. Not withdrawn.
- G. Ongoing.
- H. Interchangeable.

10. Provide one each of the following:

- A. Exemplar sample of each design version of the subject component (SRS & OPDS modules & OPDS sensor) of the subject vehicle;
- B. Field return samples of the subject component exhibiting the subject failure mode; and
- C. 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. Two sets of parts are being submitted. One set is for the 2002 model year, and the other set is for the 2003 model year.
- B. Parts are being gathered and will be submitted as soon as possible.
- C. No kits are available.

11. Provide a summary description of the vehicle's side airbag system and OPDS operation including component summary and compare the MY2000 SRS/OPDS system to the MY 2003 SRS/OPDS system from "electrical interference" effects in the subject vehicle, including:
- A. Functional block/flow diagram;
  - B. Picture/illustration of the components and component location including the SRS module, side airbag sensor and module; and
  - C. Summary table outlining the differences between the versions.

Response: See Attachment Q11

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:

- A. Refer to response for request numbers 8 and 9.
- B. Refer to response for request numbers 8 and 9.
- C. Refer to response for request numbers 8 and 9.
- D. The risk is minimal. If the OPDS has a failure or malfunction, the SRS main ECU overrides the OPDS, and the side-impact airbag will still deploy in a side crash.
- E. The SRS warning light will illuminate.
- F. Refer to response for request numbers 8 and 9.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen  
Managing Counsel  
Product Regulatory Office

WRW:ke

Attachments