

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

December 14, 2005

NVS-213DLR
PE05-050

Handwritten:
12/20/05

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

Dear Mr. Quandt:

In reply to your letter dated October 13, 2005, we are submitting a final response regarding alleged fuel tanks susceptible to puncture from road debris.

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 peer vehicle manufactured to date by Honda, state the following:
 - A. Vehicle Identification number (VIN);
 - B. Model;
 - C. Model Year;
 - D. Date of manufacture;
 - E. Date warranty coverage commenced; and
 - F. 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 2003, or a compatible format, titled "PE05-050 HONDA PRODUCTION DATA."

Response:

The data elements "a" through "f" are filed on the enclosed CD.

Make	Model	Model Year	Sales
Acura	MDX	2003	55,809
		2004	62,523
		2005	60,285
Total			178,617

Make	Model	Model Year	Sales
Honda	Pilot	2003	122,948
		2004	135,909
		2005	142,280
Total			401,137

Source: Units file containing information on all vehicles received from the factories, including vehicles sold to dealers and Honda's company car inventory.
As of: 11/30/2005

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. 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;
 - 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 "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 "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:

The total number of reports for items "a" through "g" are stated in the table below. There are no claims for items "c" through "g" to summarize.

Note: Honda does not have any Pilot or MDX fleets.

Model	Model Year	A. Consumer Reports	B. Field/Dealer Reports	C. Crash, Injury, Fatality Reports	D. Fire	E. Property Damage	F. Arbitration	G. Lawsuits
MDX	2003	1	0	0	0	0	0	0
	2004	0	0	0	0	0	0	0
	2005	0	0	0	0	0	0	0
Pilot	2003	1	0	0	0	0	0	0
	2004	1	0	0	0	0	0	0
	2005	2	0	0	0	0	0	0

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
 As of: 11/17/2005

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 2003, or a compatible format, titled "PE05-050 HONDA REQUEST NUMBER TWO DATA."

Response:

The data elements "a" through "l" are filed on the enclosed CD.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: 11/17/2005

4. Produce copies of all documents related to each item "a" through "e" within the scope of Request Number Two. Organize the documents separately by category (i.e., crash/injury/fatality reports, property damage claims, etc.) and describe the method Honda used for organizing the documents.

Response:

The documents are on the enclosed CD. They are organized by make and model year and then by the last six digits of the VIN.

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 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 2003, or a compatible format, titled "PE05-050 HONDA WARRANTY DATA."

Response:

Model	Model Year	Warranty	Goodwill	Extended Warranty
MDX	2003	0	0	0
	2004	0	0	0
	2005	0	0	0
Pilot	2003	0	1	0
	2004	0	1	0
	2004	0	0	0
Total		0	2	0

Source(s): Warranty claim data.
 As of: 10/31/2005

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 in Microsoft Access 2003, or a compatible format. 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).

Response:

Search Criteria: Using 2003-2005 MDX and Pilot warranty data, claims were pulled based on the fuel tank part number. However, road hazard is not submitted under normal warranty processing, but would be found in other sources (e.g. Techline, Customer Relations, Field Reports, Claims and Lawsuits).

Coding and descriptions:

Labor Operation Code	
310100	FUEL TANK - REPLACE. INCLUDES: DRAIN AND REFILL; TRANSFER SENDING UNIT AND FUEL PUMP
310097	STRAIGHT TIME FUEL
Problem Codes	
060	LEAKING
01701	HAIRLINE FRACTURE

Warranty Coverage:

The 2003-2005 Pilots 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.

The 2003-2005 MDXs are covered by a new vehicle limited warranty for four years or 50,000 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 subject condition in the subject peer 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 service information related to fuel tank puncture.

8. 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 components, from the start of production to date, which relate to, or may relate to, the subject condition in the subject peer vehicles. For each 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 number (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.

Response: See Attachment #Q8

Modification #1 (Pilot/HCM)

- A. August 24, 2004
- B. Beginning with the production of 2005MY Pilot, the fuel tank was lowered and the top front left area was modified. The fuel canister was moved to a new location and therefore a larger fuel tank guard was installed to cover the new canister location.
- C. Changes were made to the fuel tank to make it compliant with EPA requirements, to increase fuel capacity and to reduce slosh noise. A larger fuel tank guard was installed to cover the new fuel canister location and new tank position.
- D. Fuel Tank: P/N 17500-S3V-A12; Fuel Tank Guard: P/N 17576-S3V-A01
- E. Fuel Tank: P/N 17500-S9V-A01; Fuel Tank Guard: P/N 17576-S9V-A00
- F. Model year change, not a modification.
- G. Available as a service part for 2005 models at the time of release.
- H. No

Modification #2 (Pilot/HMA)

- A. September 7, 2004
- B. Beginning with the production of 2005MY Pilot, the fuel tank was lowered and the top front left area was modified. The fuel canister was moved to a new location and therefore a larger fuel tank guard was installed to cover the new canister location.
- C. Changes were made to the fuel tank to make it compliant with EPA requirements, to increase fuel capacity and to reduce slosh noise. A larger fuel tank guard was installed to cover the new fuel canister location and new tank position.
- D. Fuel Tank: P/N 17500-S3V-A12; Fuel Tank Guard: P/N 17576-S3V-A01
- E. Fuel Tank: P/N 17500-S9V-A01; Fuel Tank Guard: P/N 17576-S9V-A00
- F. Model year change, not a modification.
- G. Available as a service part for 2005 models at the time of release.
- H. No

Modification #3 (MDX/HCM)

- A. September 15, 2004
- B. Beginning with the production of 2005MY MDX, the fuel tank was lowered and the top front left area was modified. The fuel canister was moved to a new location and therefore a larger fuel tank guard was installed to cover the new canister location.
- C. Changes were made to the fuel tank to make it compliant with EPA requirements, to increase fuel capacity and to reduce slosh noise. A larger fuel tank guard was installed to cover the new fuel canister location and new tank position.
- D. Fuel Tank: P/N 17500-S3V-A12; Fuel Tank Guard: P/N 17576-S3V-A50
- E. Fuel Tank: P/N 17500-S9V-A01; Fuel Tank Guard: P/N 17576-S9V-A00
- F. Model year change, not a modification.
- G. Available as a service part for 2005 models at the time of release.
- H. No

9. Provide the following information concerning the subject fuel tank assemblies:
- A. Drawings showing the nominal and minimum (full jounce) design ground clearance of the subject fuel tank assembly and the corresponding location(s) on the tank assembly -- state all assumptions (e.g., tire inflation pressure);
 - B. Identify all subject vehicle components that have lower ground clearances for each condition cited in "9.a" than the subject fuel tanks and state the location and ground clearance dimension of each;
 - C. State the minimum design ground clearance for each condition cited in "9.a" for the subject vehicles, the bases for that dimension, the associated component/structure, and the location;
 - D. Provide a bottom view drawing or picture showing the undercarriage of the vehicle in the fully built configuration with the fuel tank and the locations of all components identified in "9.b" and "9.c" clearly marked;
 - E. Copies of all engineering specifications relating to the packaging, shielding, ground clearance, and/or puncture resistance of the subject fuel tanks;
 - F. Copies of all engineering standards, design guides, or similar documents that relate in any way to the packaging, shielding, ground clearance, and/or puncture resistance of fuel tanks in passenger cars or light trucks (including vans and utility vehicles);

Response: *See Attachment #Q9*

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

WRW:nis

Attachments

cc: Otto Matheke

Attachment Q8

Parts Explanation

CONFIDENTIAL

Fuel Tank Guard

Guard for fuel tank damage protection

Fuel Tank

Fuel Tank Protector

To Insulate from exhaust pipe and fuel tank guard

03~04M Pilot MDX



Canister for 03M and 04M is located in here.

Canister for 05M is moved to here to comply with new Emission regulation. Fuel tank guard is made larger to protect both fuel tank and relocated canister.
→ Same performance for damage prevention as 03M and 04M.

Attachment Q9

**ATTACHMENT Q9 IS BEING SUBMITTED UNDER
A REQUEST FOR CONFIDENTIALITY**

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2798
Phone (310) 783-2000

December 14, 2005

Mr. Otto Matheke
Office of the Chief Counsel
NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION
400 Seventh St., S.W.
Washington, DC 20590

Re: **NVS-213DLR/PE05-050**
2003-2006 MY Honda Pilot and Acura MDX fuel tank puncture inquiry

Dear Mr. Matheke:

Enclosed herewith is a Request for Confidentiality for your consideration. This material is related to the above referenced matter.

Please advise me of your decision on this matter at your earliest convenience.

Very truly yours,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

WRW:nis

Enclosure

cc: Jeffrey Quandt

OFFICE OF THE CHIEF COUNSEL
2005 DEC 15 10 11:53 AM
NHTSA

**AFFIDAVIT IN SUPPORT OF REQUEST
OF CONFIDENTIALITY**

I, William R. Willen being duly sworn, depose and say:

- 1) That I am Managing Counsel of the Product Regulatory Office of the American Honda Motor Co., Inc., and that I am authorized by American Honda Motor Co., Inc., and Honda Motor Co., Ltd., to make the following representations to the National Highway Traffic Safety Administration on behalf of American Honda Motor Co., Inc.;
- 2) That information regarding new vehicle release dates and projected sales contained in the attached submission is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4) (as incorporated by reference in and modified by S505(d)(1) of Title 5 of the Motor Vehicle Information and Cost Savings Act). American Honda is informed and believes that the disclosure of this information would result in significant competitive damage to the company;
- 3) That I have personally inquired of the responsible Honda Motor Co., Ltd. and Honda R&D Co., Ltd. (Honda), employees who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Honda;
- 4) That based upon the responses to such inquiries, to the best of my knowledge and belief, the information for which Honda has claimed confidential treatment has not been, and is not intended to be, released by Honda, to any person, organization or government agency or body outside Honda, its subsidiaries, affiliates, or contracted vendors;
- 5) Based on information and belief, none of the information in the attached materials has been released outside of the governmental entities to which they were supplied;
- 5) That I make no representations beyond those contained in this affidavit and in particular I make no representations as to whether this information may have become available outside of Honda and its subsidiaries, because of unauthorized or inadvertent disclosure except as stated in Paragraph 4;
- 6) That the attached information remain confidential until the model has been released; and
- 7) That the information contained in the enumerated paragraphs of this affidavit is true and accurate to the best of my information, knowledge and belief.



William R. Willen

Subscribed and sworn to before me, this 14th day of December, 2005.


NOTARY PUBLIC

