



HYUNDAI-KIA MOTORS

January 27, 2006

Mr. Jeffrey L. Quandt
Chief, Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

RE: NVS-213dlr, PE05-059

Dear Mr. Quandt:

This letter responds to your above referenced request for information, dated December 1, 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.

Request 1.

State, by model year and original equipment wheel and tire usage, the number of subject vehicles Hyundai has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Hyundai, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Original equipment wheel;
- f. Original equipment tire;
- 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, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

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Response to Request 1.

Model	Model Year	Production Quantity (6.0Jx15 Steel Wheel with Wheel Cover and 205/65R15 Michelin Energy MXV4 Plus Tires)	Production Quantity (6.0Jx16 Alloy Wheel with 205/60R16 Michelin Energy MXV4 Plus Tires)
Sonata	2002	38,425	39,969
Sonata	2003	34,881	41,126
Sonata	Total 2002-2003	73,306	81,095

Note: Although Request 1 asks for information related to all 2002 and 2003 model year Sonatas produced for sale in the U.S., only the 73,306 vehicles equipped with steel wheels and wheel covers are relevant to this information request's definition of subject component.

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

Source: Hyundai Motor America
Information as of January 11, 2006

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 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; 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).

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In addition, for items "c" 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. 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 to Request 2.

a. Consumer complaints, including those from fleet operators;

Model / Model Year	2002	2003
Sonata	28 (Regarding 27 vehicles) (Includes 1 for a vehicle that is also referenced in a field report)	26 (Regarding 25 vehicles)

b. Field reports, including dealer field reports;

Model / Model Year	2002	2003
Sonata	1 (Also referenced in a consumer complaint)	1

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	2002	2003
Sonata	None	None

d. Property damage claims; and

Model / Model Year	2002	2003
Sonata	None	None



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

Model / Model Year	2002	2003
Sonata	None	None

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

Model / Model Year	2002	2003
Sonata	None	None

Source: Hyundai Motor America

Information as of January 6, 2006 for 2a and 2b and as of January 10, 2006 for 2c, 2d, 2e, and 2f.

Request 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:

- Hyundai's file number or other identifier used;
- The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- Vehicle's VIN;
- Vehicle's make, model and model year;
- Vehicle's mileage at time of incident;
- Incident date;
- Report or claim date;
- Whether a crash is alleged;
- Whether property damage is alleged;
- Number of alleged injuries, if any; and
- Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

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Response to Request 3.

See Attachment "REQUEST NUMBER TWO DATA..mdb" for requested information.

Source: Hyundai Motor America

Information as of January 6, 2006 for 2a and 2b and as of January 10, 2006 for 2c, 2d, 2e, and 2f.

Request 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 Hyundai used for organizing the documents.

Response to Request 4.

See Attachment A for requested consumer complaint information.

See Attachment B for requested field report information.

Source: Hyundai Motor America

Information as of January 6, 2006 for 2a and 2b and as of January 10, 2006 for 2c, 2d, 2e, and 2f.

Request 5.

State, by model year and original equipment wheel and tire usage, a 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 alleged defect in the subject 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.

Separately, for each such claim, state the following information:

- a. Hyundai'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;

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- 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, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response to Request 5.

Model	Model Year	Claim Quantity (6.0Jx15 Steel Wheel with Wheel Cover and 205/65R15 Michelin Energy MXV4 Plus Tires)
Sonata	2002	15 (12 Vehicles)
Sonata	2003	20 (12 Vehicles)

See Attachment "WARRANTY DATA.mdb" for additional requested information.

Source: Hyundai Motor America
Information as of January 13, 2006

Request 6.

Describe in detail the search criteria used by Hyundai 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 Hyundai 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 Hyundai 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 to Request 6.

Hyundai's warranty system does not contain a code to identify tire valve replacement. With the exception of newly introduced TPMS tire valves utilized on models other than the subject

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vehicles, Hyundai's service parts system does not contain a part number for non-TPMS tire valves and Hyundai does not sell non-TPMS tire valves through the Hyundai parts system.

Claims involving wheel covers and steel wheels may be made for many reasons unrelated to tire valve replacement. However, in an effort to provide a meaningful response to Request 5, Hyundai utilized the following process.

Some warranty data provided in response to Request 5 was developed based upon the sublet replacement of a tire, which may include replacement of a tire valve, on the same repair order that listed the steel wheel or wheel cover as a causal part.

All Labor Operation Codes beginning with 52910R, designating the Tire and/or Wheel Assembly, and 52961R, designating the Wheel Cover, were scanned for sublet claims that contained a Tire Replacement Code T1. Such claims that listed a Part Number of 52910-3D000 for the Steel Wheel or 52960-3D500 for the Wheel Cover were scanned and the repair orders of those with Warranty Nature Codes of N89 (Leaks-Other - Air, Fuel, Gas, Vacuum), N59 (Broken, Crack), and N99 (Others) were evaluated to determine if the claims were relevant to the alleged defect.

Also, some warranty claims contain information in the Condition category. Warranty claims containing the word "valve" in the Condition category with the steel wheel or wheel cover as a causal part were also included in response to Request 5, even if there was no sublet for tire or tire valve replacement.

All Labor Operation Codes beginning with 52910R, designating the Tire and/or Wheel Assembly, and 52961R, designating the Wheel Cover, were scanned for the presence of the word valve in the Condition category.

Hyundai also checked if additional possibly relevant warranty claims were filed for any of the vehicles reported in response to Request 2a 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. Tires and Tire Valves are not covered by the Hyundai New Vehicle Limited Warranty.

Hyundai offered two extended warranty options for the subject 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:

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72 months or 75,000 miles plan

Model / Model Year	2002	2003
Sonata	642	500

120 months or 100,000 miles plan

Model / Model Year	2002	2003
Sonata	9,081	8,785

Neither Hyundai extended warranty plan covers tire valve stem replacements.

Source: Hyundai Motor America
Information as of January 18, 2006

Request 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 Hyundai 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 Hyundai is planning to issue within the next 120 days.

Response to Request 7.

There are no such documents.

Source: Hyundai Motor America
Information as of January 23, 2006

Request 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, Hyundai. For each such action, provide the following information:

- a. Action title or identifier;

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- 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 to Request 8.

During vehicle development over the period between August 1996 and September 2001, Hyundai Motor Company conducted various durability tests, such as 30,000 km Cross Country

Durability Tests and 3,000 km Belgian Road Durability Tests. No tire valve damage resulting from wheel cover contact occurred during these tests.

Hyundai Motor Company began to review some non-original equipment tire relationships to wheels and wheel covers in late January 2006 in an effort to gain understanding of what may be variations in the design of non-original equipment tires. No additional information is available at this time.

Source: Hyundai Motor Company
Information as of January 19, 2006

Request 9.

Describe all modifications or changes made by, or on behalf of, Hyundai 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;

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- 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 Hyundai is aware of which may be incorporated into vehicle production within the next 120 days.

Response to Request 9.

There have been no modifications or changes of the subject component.

Source: Hyundai Motor Company
Information as of January 18, 2006

Request 10.

Provide one of each of the following:

- a. Copies of the MY 2003 and 2004 owner's manuals for the subject vehicles.
- b. Engineering design drawings for the wheels and wheel covers used in the subject vehicles.
- c. An overlay drawing of the wheel and wheel cover highlighting the retention features of the wheel cover to the wheel of the subject vehicle.
- d. Drawings showing the lateral design clearance of the tire to the wheel cover at the maximum radial point of the wheel cover. The lateral design clearance drawings should include design clearance at the design maximum and minimum tire deflection and the design tolerances for tires inflated to the recommended inflation pressure and vehicles at the gross axle weight rating (GAWR). Provide additional drawings and clearance information for tires that are 5, 10 and 15 psi below the recommended inflation pressure(s).
- e. One exemplar sample of an assembled wheel, tire and wheel cover assembly.
- f. All specifications and/or standards as related to the incoming part quality of the wheel covers. Including any specifications or standards relating to excess flash or the mold parting lines.
- g. Any kits that have been released, or developed, by Hyundai for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Response to Request 10.

- a. Copies of the MY 2003 and 2004 owner's manuals for the subject vehicles.

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See Attachment C for requested information.

Source: Hyundai Motor America
Information as of January 13, 2006

b. Engineering design drawings for the wheels and wheel covers used in the subject vehicles.

See Attachment D for requested information.

Source: Hyundai Motor Company
Information as of January 19, 2006

c. An overlay drawing of the wheel and wheel cover highlighting the retention features of the wheel cover to the wheel of the subject vehicle.

See Attachment E for requested information.

Source: Hyundai Motor Company
Information as of January 19, 2006

d. Drawings showing the lateral design clearance of the tire to the wheel cover at the maximum radial point of the wheel cover. The lateral design clearance drawings should include design clearance at the design maximum and minimum tire deflection and the design tolerances for tires inflated to the recommended inflation pressure and vehicles at the gross axle weight rating (GAWR). Provide additional drawings and clearance information for tires that are 5, 10 and 15 psi below the recommended inflation pressure(s).

Requested information is not available at this time.

Source: Hyundai Motor Company
Information as of January 19, 2006

e. One exemplar sample of an assembled wheel, tire and wheel cover assembly.

Attachment F, Wheel, Wheel Cover and Tire Assembly, Shipped Separately.

Source: Hyundai Motor America

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Information as of January 13, 2006

f. All specifications and/or standards as related to the incoming part quality of the wheel covers. Including any specifications or standards relating to excess flash or the mold parting lines.

See Attachment G for requested information. Korean language version provided. An English language translation is being made and will be provided as soon as it becomes available.

Source: Hyundai Motor Company
Information as of January 19, 2006

g. Any kits that have been released, or developed, by Hyundai for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

There are no such kits.

Source: Hyundai Motor Company
Information as of January 19, 2006

Request 11.

State the number of each of the following that Hyundai has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (*including the cut-off date for sales, if applicable*):

- a. Subject component; and
- b. Any kits that have been released, or developed, by Hyundai for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Hyundai is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

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Response to Request 11.

- a. See Attachment H for requested part sales information.

Source: Hyundai Motor America
Information as of January 10, 2006

- b. No kits have been released.

Source: Hyundai Motor Company
Information as of January 19, 2006

Steel Wheel Supplier:

Model	Model Year	Supplier	Street Address	Contact	Telephone Number
Sonata	2002 – 2005	Hyundai MOBIS	Headquarters: 679-4 YeoSam 1-Dong, KangNam-Gu, Seoul, Korea	CEO: K. H. Han	02-218-5114
			Plant: Ulsan, Namku, Macam-dong, 393, Korea	Director W. S. Lee	052-279-7114

Wheel Cover Suppliers:

Model	Model Year	Supplier	Street Address	Contact	Telephone Number
Sonata	2002 – 2003 (Until November 30, 2002)	WooJin GyemSok	Choongnam, Asan, Youmchi-Eup, Seokjung-Ri, 31-1, Korea	CEO: K. W. Lee	041-543-3355
Sonata	2003 – 2005 (Beginning December 1, 2002 Until September 2, 2005)	JinYoung SanYeob	Choongnam, Asan, Sunjang-myoun, Kasan-Ri, 400-1, Korea	CEO: S. Y. Kim	041-539-2116

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Sonata	2002 – 2005 (Service Parts Since September 3, 2005)	Eco Plastic Inc.	Headquarters: 48 HwangSung-Dong, KyungJu-Si, KyungSangBuk-Do, Korea	CEO: Vice- Chairman I. K. Shin	054-770- 3211
			Plant: Choongnam, Asan, Doonpomyoun, Sinhang-Ri, 104-26, Korea	General Manager S. K. Lee	041-532- 9382

Request 12.

Furnish Hyundai's assessment of the alleged defect in the subject vehicle, including:

- The causal or contributory factor(s);
- The failure mechanism(s);
- The failure mode(s);
- The risk to motor vehicle safety that it poses;
- 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
- The reports included with this inquiry.

Response to Request 12.

Only 64 individual VINs have been identified as being affected by this issue in either a customer complaint, a field report, a warranty claim, or a VOQ out of 73,306 vehicles equipped with steel wheels and wheel covers. This is only 0.087% of the vehicles equipped with steel wheels and wheel covers. All reports and claims appear to be related to non-original equipment tires.

- The causal or contributory factor(s);

The alleged defect has been reported to occur after the installation of aftermarket, non-original equipment tires. As a rule, tire valves are changed when tires are replaced. Hyundai has no knowledge of the origins or design or specifications of the tire valves installed on these 64 vehicles at the time of the alleged tire valve damage.

- The failure mechanism(s);

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The alleged defect has been reported to occur after the installation of aftermarket, non-original equipment tires. As a rule, tire valves are changed when tires are replaced. Hyundai has no knowledge of the origins or design or specifications of the tire valves installed on these 64 vehicles at the time of the alleged tire valve damage. Hyundai has not been able to identify a "failure mechanism" related to the alleged defect.

c. The failure mode(s);

The alleged defect has been reported to occur after the installation of aftermarket, non-original equipment tires. As a rule, tire valves are changed when tires are replaced. Hyundai has no knowledge of the origins or design or specifications of the tire valves installed on these 64 vehicles at the time of the alleged tire valve damage. Hyundai has not been able to identify a "failure mode" related to the alleged defect.

d. The risk to motor vehicle safety that it poses;

The valve stem damage has occurred on vehicles with aftermarket tires, which as a rule also would involve replaced valve stems. Since these aftermarket changes are beyond the control of Hyundai, Hyundai does not have a detailed understanding of the failure mechanism or failure mode. Nevertheless, Hyundai does have several observations concerning the risk to motor vehicle safety.

The principal concern with the valve stem failure is safety to motorists. Although the subject vehicle population is quite large, and has had several years of driving exposure, there has not been a single incidence of a crash that is causally related to the valve stem damage. That is, not a single crash involving either a moving vehicle or one that may have been parked on the roadside after a valve stem incident. While the loss of tire air pressure will result in some handling changes to the vehicle, automotive testing and experience has demonstrated that a vehicle can be safely maneuvered and safely parked out of harm's way should a valve stem failure occur. The total lack of any crashes related to this issue indicates that there is no risk to motor vehicle safety.

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

Hyundai has not been able to identify if there would be a warning related to the alleged defect.

f. The reports included with this inquiry.



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The reports included with this inquiry are similar to the customer complaints received by Hyundai Motor America in that they reflect tire valve leakage after the tires, and most likely the tire valves, were replaced at mileages generally exceeding 30,000 miles. The alleged defect has not been identified as occurring when original equipment tires are installed.

Source: Hyundai Motor Company
Information as of January 19, 2006

Hyundai has noted similarities between this investigation and a previous NHTSA investigation of tire valve failures. EA02-018 was a NHTSA investigation of tire valve ejection and leakage on various Ford Motor Company vehicles. The investigation was closed despite numerous reports from the field for several reasons, including the fact that only three minor crashes were reported and there were no injuries. Tests conducted by Ford and NHTSA indicated that vehicles could be maneuvered safely to the shoulder of the road in the event of a valve stem failure. Also, field data did not indicate any multiple vehicle roadside incidents.

Hyundai believes that PE05-059 should also be closed based upon similar reasoning to that used by NHTSA in the past. That is, the fact that there have been no accidents or injuries and that the tire valve damage has been reported on a very small number of vehicles after they have had the tires, and most likely tire valves, changed from the original equipment components. Also a vehicle can be safely maneuvered and safely parked out of harm's way should a valve stem failure occur.

Sincerely,

Robert Babcock
Manager, Certification and Compliance Issues

Attachments:

Two CDs, each containing:
NVS-213dlr, PE05-059 PRODUCTION DATA.mdb;
NVS-213dlr, PE05-059 REQUEST NUMBER TWO DATA.mdb;
NVS-213dlr, PE05-059 WARRANTY DATA.mdb;
NVS-213dlr, PE05-059 Attachment A Consumer Complaints.doc;

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NVS-213dlr, PE05-059 Attachment B Field Reports.pdf;
NVS-213dlr, PE05-059 Attachment D Engineering Drawings Steel Wheel and Wheel
Cover.xls;
NVS-213dlr, PE05-059 Attachment E Overlay Drawing.ppt;
NVS-213dlr, PE05-059 Attachment G Inspection Standard (WHEEL COVER).pdf; and
NVS-213dlr, PE05-059 Attachment H Parts Sales – Steel Wheel and Wheel Cover.xls

One Attachment C containing:
One 2003 model year Sonata Owner's Manual and one 2004 model year Sonata Owner's
Manual

Note: Attachment F, Wheel, Wheel Cover and Tire Assembly, Shipped Separately

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