

HONDA

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

Handwritten: 4/19/06

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NVS-213car
PE06-010

April 14, 2006

OFFICE OF THE
DIRECTOR

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 March 9, 2005, we are submitting a final response regarding alleged Tire Pressure Monitoring System (TPMS) failure. The subject peer vehicle definition was for MY2003-2006 Honda Odyssey. We have submitted information for MY2005-2006 Odysseys only because the Touring model from these model years is equipped with TPMS.

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. Make;
 - C. Model;
 - D. Model Year;
 - E. Drive Type;
 - F. Size of tire fitted on the vehicle as original equipment;
 - G. Make of tire fitted on the vehicle as original equipment;
 - H. Line (model) of tire fitted on the vehicle as original equipment;
 - I. Run Flat or Non-Run Flat Tire;
 - J. Indirect or Direct TPMS;
 - K. Date of manufacture;
 - L. Date warranty coverage commenced; and
 - M. 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 "HONDA PEER PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response:

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

| Model | Model Year | Sales |
|---------|------------|--------|
| Odyssey | 2005 | 25,230 |
| | 2006 | 2,031 |

2. State, by model year, 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 "e" 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 "e" 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:

Note: Honda does not have any Odyssey fleets.

| Model | Model Year | A. Consumer Complaints | B. Field Reports | C. Crash, Injury, or Fatality Reports | D. Fire Reports | E. Property Damage Claims | F. Third-Party Arbitration Proceedings | G. Lawsuits |
|---------|------------|------------------------|------------------|---------------------------------------|-----------------|---------------------------|--|-------------|
| Odyssey | 2005 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 2006 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
 As of: 03/31/2006

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. Alleged defect category (i.e., Alleged defect type a, b, or c)
- D. Failure consequence (i.e., low tire pressure, flat tire, tire blowout, tread separation, etc.);
- E. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- F. Vehicle's VIN;
- G. Vehicle's make, model and model year;
- H. Tire's size, make, and line;
- I. Vehicle's mileage at time of incident;
- J. Incident date;
- K. Report or claim date;
- L. Whether a crash is alleged;
- M. Whether a fire is alleged;
- N. Whether property damage is alleged;
- O. Number of alleged injuries, if any; and
- P. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2003, or a compatible format, titled "HONDA PEER REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response:

Honda did not have any claims or reports relating to the alleged defect in the subject vehicles.

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:

Honda did not have any documents relating to the alleged defect in the subject vehicles.

5. State, by 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 peer 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. Failure consequence (i.e., low tire pressure, flat tire, tire blowout, tread separation, etc.)
- H. Labor operation number;
- I. Problem code;
- J. Replacement part number(s) and description(s);
- K. Concern stated by customer; and
- L. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003, or a compatible format, titled "HONDA PEER WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response:

| Model | Model Year | Warranty | Goodwill | Extended Warranty |
|---------|------------|----------|----------|-------------------|
| Odyssey | 2005 | 0 | 0 | 0 |
| | 2006 | 0 | 0 | 0 |

Source(s): Warranty claim data.
 As of: 03/31/2006

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 peer 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 peer vehicles and state by option and model year, the number of vehicles that are covered under each such extended warranty.

Response:

There were no claims that met the search criteria.

There are no labor operations, labor operation descriptions, problem codes, or problem code descriptions to submit.

Warranty Coverage: The 2005-2006 Odysseys 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. For each component part number of the subject peer system, including, but not limited to, the tires, wheels, and the TPMS, 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 Honda is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response: See Attachment Q7

8. Provide, by model year, a description of how each subject peer system functions. This includes, but is not limited to, the following for each subject peer system:
- A. Identify whether the subject peer system is indirect or direct;
 - B. Describe how the subject peer system functions in all normal operating modes;
 - C. State the highest tire pressure at which the TPMS warning light will illuminate in the normal operation mode;
 - D. State how long after the tire pressure reaches the pressure defined in 8.c. it takes for the TPMS light to illuminate;
 - E. What warnings, if any, the operator would have that the subject peer system was malfunctioning;
 - F. Describe the conditions or circumstances, other than components failing, under which the subject peer system may not function properly (i.e. the low pressure warning light may not come on even if the tire pressure is low or the low pressure warning light may come on when the tire pressure is actually normal);
 - G. State why the conditions listed in 8.f. cause the subject peer system to not function properly; and
 - H. Describe any differences in how the subject peer system functions for the subject peer vehicles, respectively, which use run-flat tires and those that use non-run flat tires.

Response: See Attachment Q8

- A. Direct
- B. Refer to Attachment Q8B
- C. Front tire is 183kPa and rear tire is 190kPa.
- D. Every minute a signal is sent.
- E. The warning light on the instrument panel will illuminate.
- F. No other condition or circumstance.
- G. No conditions or circumstances.
- H. There is no difference.

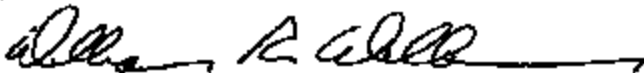
9. State whether Honda ever considered any alternative TPMS for the subject peer vehicles during design/development and, if so, provide the following information regarding those systems:
- A. A list of summarizing all alternative systems;
 - B. Name of the supplier for each system;
 - C. Whether each alternative system is a direct or an indirect TPMS;
 - D. Describe the attributes of each TPMS that were tested and/or evaluated by, or for, Honda; and
 - E. Explain the reasons for the final design decision to select the TPMS that is used in the subject peer vehicles and compare the attributes of that system with those of the other systems that were tested and/or evaluated.

Response:

No alternative TPMS for the subject peer vehicles during design/development was considered.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

WRW:nis

Attachments

Attachment Q7

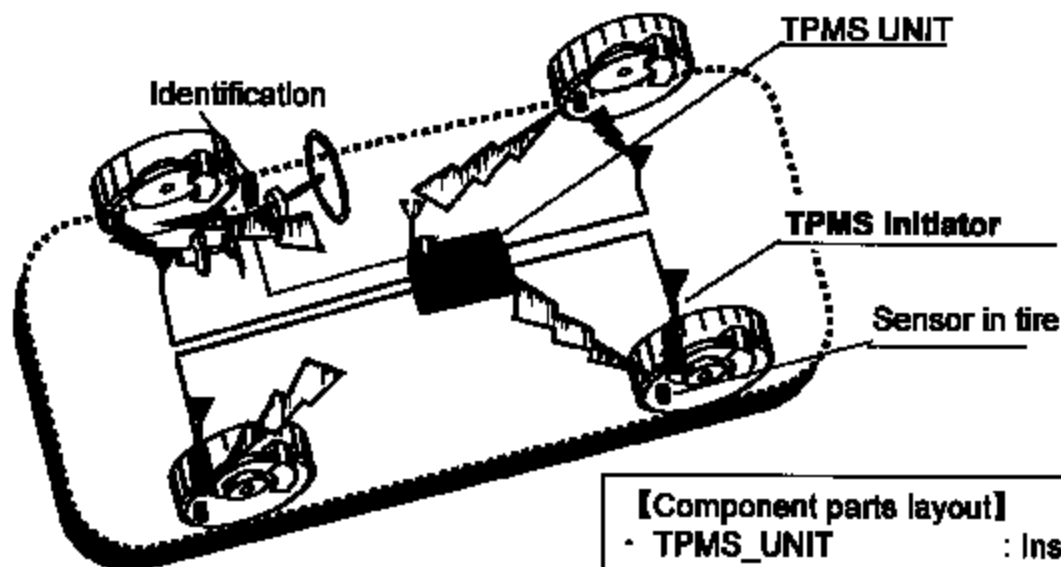
| Model | Model year | Component name | Part Number | Supplier name | Address | Contact Name | Official position | Telephone number |
|---------|------------|---------------------|--|------------------------------|---|------------------|---------------------------|------------------|
| Odyssey | 05M,06M | TPMS Sensor | 05M : 42753-S3V-A041-M1, A050-M1, A060-M1 06M : 42753-S3V-A070-M1 | TRW Automotive | 24175 Research Drive Farmington Hills, MI 48335-2842 | Jeffrey Rochette | Director, Engineering | 248-442-6236 |
| | | TPMS Initiator | 39360-S9V-A011-M1 | | | | | |
| | | Receiver Unit | 39350-SHJ-A020-M1 | | | | | |
| | | Tire/Wheel Assembly | 42751-SHJ-A020-M1 | Michelin North America, Inc. | 3200 West Big Beaver Road, Ste 201 Troy, MI 48064 | Hiroshi Kageyama | Technical Account Manager | 248-848-8132 |
| | | Multi Display | 05M:78100-SHJ-A020 06M:78100-SHJ-A030 | New Sabine Industries, Inc. | 12655 East US Rt 22 & St Rt 3 Sabina, OH 45169 | Masaki Hasegawa | Utsunomiya Office Manager | 028-832-6567 |

Attachment Q8

■ Information flow chart for TPMS

Other than monitoring tire internal pressure in conformity with regulations, switch operation mode (actuation / stop) of sensors placed in tires and synchronized with IG SW.
(Sensor is controlled by two-way communication between sensor and UNIT by initiator.)

【Structure】



【Component parts layout】

- TPMS_UNIT : Inside cabin
- TPMS sensor in tire : Valve area in tire
- TPMS initiator : Inside tire house

【Display examples】

- System W/L (yellow)
- Tire warning lamp (yellow)
- Individual tire location

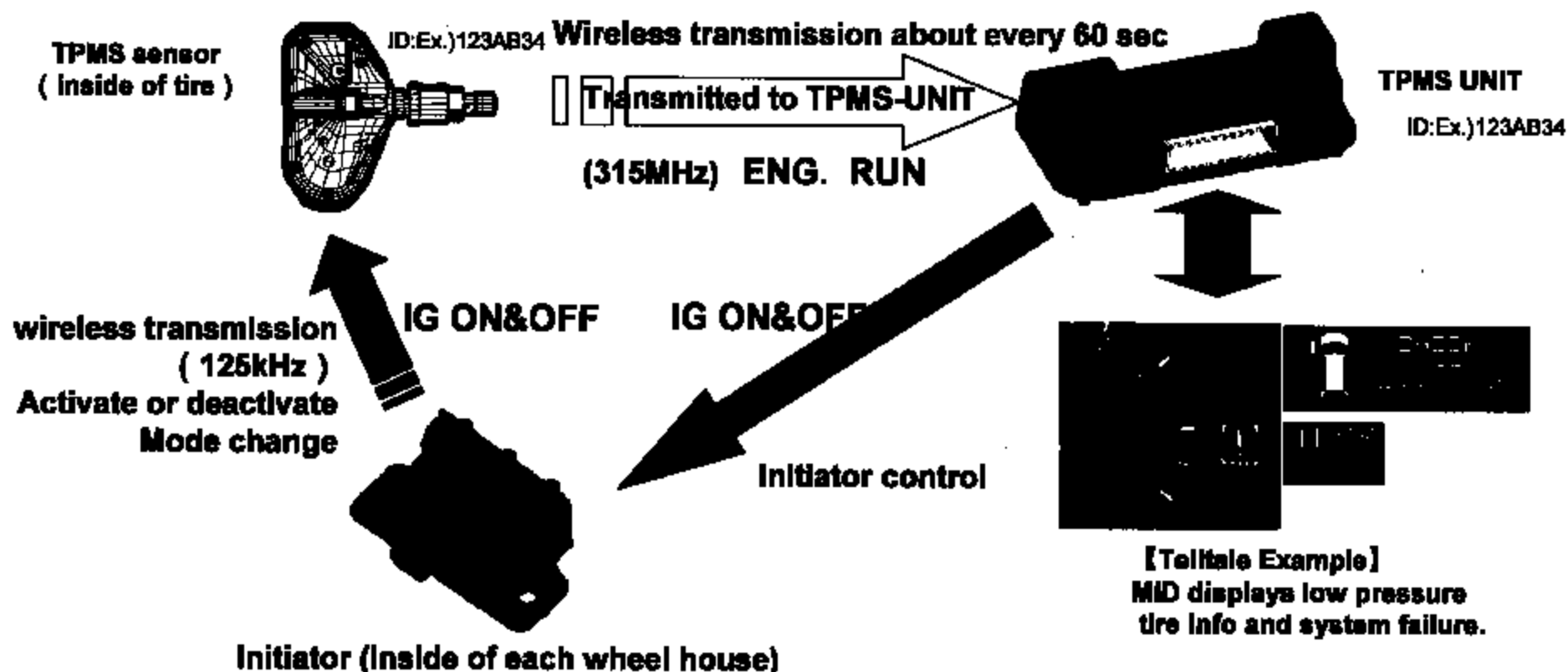


【TPMS with location identification】

TPMS UNIT and Sensor. Tire pressure and temp data can be monitored by these two components.

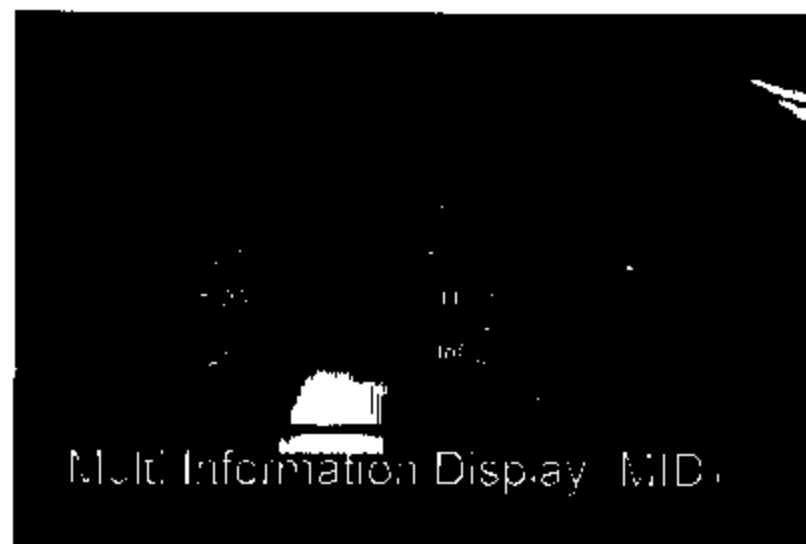
Initiator is added to detect tire sensor, which achieves the following functions:

- ◆Sensor stop during IG - OFF
- ◆Detection and display of low pressure tire location
- ◆Automatic ID learning by new sensor
- ◆Automatic learning and self check of sensor inspection In SS



'05-'06 HONDA ODYSSEY Display

(EXL Touring)



Normal mode :

Pressing Select/Reset Button on Tire Pressure Display Screen will show actual pressure values



Low pressure tire Telltale will illuminate



Low pressure mode : +



Low pressure tire location will indicate in the MID

System failure mode :

TPMS Telltale will appear in the MID

